

Bradford on Avon

Housing Needs Assessment (HNA)

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Quality information

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List of acronyms used in the text:

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

1. Executive Summary

1. Bradford on Avon is a Neighbourhood Area located in the local authority area of Wiltshire. The Neighbourhood Area boundary covers the areas administered by Bradford on Avon Town Council.
2. The Office for National Statistics mid-2020 population estimate for Bradford on Avon is 10,048 individuals, suggesting an increase of 646 individuals since the 2011 Census.
3. There has been significant/etc development in the NA since 2011, with Wiltshire Council providing completions data from 2011 to 2021 showing the development of 443 additional dwellings – 10% growth on the number at the time of the 2011 Census. The total quantity of dwellings in the NA is therefore estimated to be 4,888.
4. This Executive Summary details the conclusions of each chapter of the report, addressing the research questions formulated at the outset of the research.

Conclusions- Tenure and Affordability

5. Bradford on Avon's current tenure mix reveals a high rate of home ownership compared wider averages, at 74%, and a corresponding lack of Affordable Housing and private rented options (despite a 66% increase in the latter category between 2001 and 2011).
6. Home values in the parish have increased markedly over the last decade with the value of an average home (mean) now 38% higher than it was in 2012. An entry-level home currently costs £285,000 with a median home costing 37% more at £390,000. The stock is currently dominated by terraced properties (31.5%) followed by detached (28.6% including bungalows) and semi-detached (23.6%) properties.

Tenure options

7. AECOM has estimated the annual income required to afford various tenures of housing in the NA – each of which is explained in detail in Appendix A. These thresholds are compared to local incomes to determine which options are the most appropriate for local people going forward. The average household income in Bradford on Avon is £47,200, and the lower quartile income in 2020 was £13,788 (per person).
8. It was found that a household on average income would be unable to afford any of the market housing options; even an entry-level home in the area would require a 55% uplift to average earnings (or a very large deposit) to be affordable. The situation is even worse for dual lower earner households who would be unable to access home ownership through the mainstream market.
9. Private renting is also unaffordable to average income households with entry level rents requiring a 7% uplift in earnings to be affordable. Double lower quartile earners would require an uplift of over 80% to their incomes before they can afford entry-level market rents.
10. Affordable and social rental property is affordable to dual earning lower quartile households but unaffordable to single lower earning households. The latter must

therefore either remain in affordable / social rents or in the private rented sector while relying on housing benefit or other support.

11. All three income groups in Bradford on Avon cannot afford to buy or rent privately as they are typically earning less than £50,520 per year (at which point entry-level rents become affordable). Therefore, affordable rents (including social rents) and a range of affordable home ownership products such as First Homes and shared ownership are likely to be very beneficial to residents of the NA.
12. The income required to afford First Homes was estimated above and the implications of 30%, 40% and 50% discount levels tested. The maximum 50% discount would be required to make First Home comfortably affordable to average income households, although would not be sufficient for double lower earning households. On this basis a 50% discount would extend affordable ownership options to the widest number of households (average earners) and may be a suitable option for the Parish subject to other considerations, such as the financial impact of higher discounts on the development overall, which creates the risk that fewer affordable rented homes might be provided. This is a matter for discussion with Wiltshire Council if relevant. Shared ownership tenures were also assessed and found to be more affordable than nominally (30%) discounted First Homes.
13. Given the lack of affordability in the NA's housing market, all affordable home ownership products appear valuable to the local population, with shared ownership at a lower than 25% equity share potentially allowing lower earning households to get a foot on the housing ladder. While rent to buy offers poorer long-term prospects but may be helpful to those with little or no savings for a deposit, and First Homes at a 50% discount provides the best long-term support to those with higher incomes.
14. Affordable rented housing appears affordable to average and dual lower quartile earning households. Single lower quartile income households cannot afford affordable or social rents in the NA. Many such individuals will, if unable to secure a social rented dwelling and additional subsidy, need to live in a room in a shared house using housing benefit.
15. The evidence in this chapter suggests that the small affordable rented sector performs a vital function in Bradford on Avon as the only option for a large segment of those in the greatest need. Being cheaper for the occupant, social rent performs this function best.

Quantity of Affordable Housing needed

16. The Swindon and Wiltshire SHMA (2017) identified a need for 14,600 affordable homes for rent and affordable homeownership between 2016 and 2036 for Wiltshire. The SHMA also identifies that 73% of new affordable homes should be for rent and 27% should be for intermediate tenures (such as shared ownership or shared equity). The overall housing need was subsequently updated in the Swindon and Wiltshire Local Housing Needs assessment 2019 (LHNA) which assessed the total housing need to be 45,700 for Wiltshire, equating to a 5.67% uplift on the previous SHMA estimate (43,247). Applying the same uplift to the total AH need and pro rating the figure to Bradford on Avon based on its share of Wiltshire's population (2%) produces a requirement for 217

affordable dwellings over the period 2016-2036 or 15.5 affordable dwellings per annum (dpa).

17. Applying the SHMA tenure split to Bradford on Avon produces a potential need for 158 dwellings for affordable rent and 59 units for affordable ownership tenures over the 14 years of the Neighbourhood Plan period. These figures give a reasonable guide to the potential scale of need for Affordable Housing in Bradford on Avon over the NP period.

Policy considerations

18. Wiltshire's adopted policy on this subject (WCS policy C43) requires 30% (in 30% zones) to 40% (in 40% zones, including the NA) of all new housing development of more than 5 dwellings to be affordable. The WCS allocates 595 homes in Bradford on Avon, if all sites met the 5 dwellings threshold up to 238 affordable units might be expected in the NA. This would meet the potential demand estimated above. However, the Council's housing data indicates that only around 81 AH units were delivered over the last 10 years out of a total of 443 dwellings equating to a AH delivery rate of just over 18%. The Wiltshire Local Plan 'Looking to the future Emerging Spatial Strategy' document (2019) indicates that out of the 350 proposed housing allocations in the emerging Local Plan (2016-2036) only 80 remain to be delivered in the NA (the residual requirement as of 1st April 2019). Recent housing data from Wiltshire Council shows that a further 84 dwellings were completed between in 2019/2020 and 2020/2021. This means that the housing growth allocated to Bradford on Avon in the emerging Local Plan has substantially been met.
19. As a result, affordable rented housing should have a higher weighting in the tenure mix to ensure that the most acute needs are met as a priority. But given the historic delivery rates it is reasonable to assume that supply will be limited and affordable rented accommodation should be prioritised.
20. On the balance of factors listed in the Policy Guidance section of this chapter, the 73% rented 27% ownership guideline mix in the SHMA may offer an appropriate benchmark. Affordable Housing should take the form of 73% rented tenures such as social and affordable rent (preferably the former), with the remaining 27% as affordable routes to home ownership, fulfilling the requirements of the new First Homes product and allowing for some shared ownership or other tenures to widen choice.
21. The rationale for following the SHMA mix (73/27) is that it aligns with the priorities suggested by the data for Bradford on Avon, namely that there is a greater current deficit. Furthermore, and the provision of AH for rent would meet the most urgent needs which should be met as a priority.

Conclusions- Type and Size

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

The existing housing stock

23. Bradford on Avon has a housing stock dominated by terraced properties which make up almost a third of stock, followed by semi-detached homes (around a quarter of stock). There are substantially fewer detached homes compared to Wiltshire as whole (both being above the national average). Flats make up 16% of stock, a bigger proportion than for Wiltshire but less than the average for England.
24. In terms of dwelling size, Bradford on Avon has a relatively balanced housing stock with 3 bedroom dwellings being the most common size (around 47% in 2021) which is a little higher than the corresponding levels in the wider geographies (around 43%). Two bedroom homes are the next most common size (around 24%) followed by 4 bedroom dwellings (around 17%). Small (1 bedroom) properties make up 10% of stock, a higher proportion than for Wiltshire (7.4%) but below the national average (12.6%). It appears that recent development may be helping to address some of the affordability issues in Bradford on Avon by providing smaller dwellings.

Demographics

25. The age structure of the population is a key indicator of the future need for housing. Bradford on Avon had a generally older population profile than Wiltshire and England in 2011. The older age brackets have also grown the fastest between the 2011 census and the latest ONS estimates for 2020. Currently around 58% of the population are aged over 45 and 30% are aged over 65. There is a clear trend toward ageing, and current estimates also suggest that young adults are leaving the NA, which may reflect a lack of suitable options for newly forming households.
26. Applying the ONS household projections for Wiltshire to the Bradford on Avon population suggests that by 2036 the 65 and over cohort could increase by 72% from 2011 levels to become by far the dominant group at 50% of the projected total, while the youngest age groups remain stable or decline. It is clear that ageing will be a major driver of housing need in Bradford on Avon going forward, whether older households intend to occupy the same dwellings they currently live in, or perhaps move within the community to a home better suited to the size of their household or their evolving needs.
27. Bradford on Avon has more single person households than the rest of Wiltshire and national average. It also has more households (single and family) aged 65 and over. Of those younger than 65 the balance between families with and without children favours

those with children. In summary, there are comparatively more people living alone in Bradford on Avon and there are more older households.

28. Bradford on Avon has a high rate of under-occupancy, with 79% of households living in a home with at least one bedroom more than they would be expected to need (at the time of the last Census). The percentage of people living in homes with fewer bedrooms than they might be expected to need is relatively small at 3.4%.
29. The previous identified high property values in the area, so it would appear that the largest homes are not necessarily occupied by those with the largest families but by those with the financial capacity to do so, irrespective of their household size, or by older people who have not chosen or be able to move to smaller properties. This latter point is confirmed when considering the data for different household types. Around 96% of couples aged over 65 have more bedrooms than they would be expected to need.

The future dwelling mix

30. The results a modelling exercise, which looks at the sizes of dwelling occupied by households at different life stages and projects the growth and decline of those household age groups over the plan period, suggests that new development should be focused on smaller (2 bedroom) and mid-sized homes (3 bedroom). The model also suggests that there will continue to be moderate demand for larger (4 bedroom plus) homes but demand for the smallest homes (1 bedroom) is likely to be very limited.
31. Therefore, new construction should help to boost the supply of 2-3 bedroom homes if the type of development is considered appropriate in terms of character and density. The provision of too many of the smallest (1 bedroom) should be avoided as demand will likely be very limited in the context of current supply. Similarly, the provision of too many larger (5 bedroom plus) homes should avoided.
32. Small and mid-sized homes would improve affordability as well as the parish's offering for younger households who have few options for their next step on the property ladder. It may also enable older households currently under-occupying larger homes to downsize and in so doing potentially create churn in the market, although it is acknowledged that many of the larger historic properties may be too expensive to be taken up by younger local families.
33. To best meet the needs of the large cohort of older households expected to be present by the end of the Plan period, it should be considered whether the existing options are well tailored to older people's requirements in terms of space, flexibility, quality, location and accessibility. Variety should be sought within the mid-sized homes that come forward in future to attract both newly forming households on lower budgets and older households with substantial equity from their existing larger homes. Facilitating downsizing among older households may release those larger homes for use by families who need more bedrooms.
34. In terms of dwelling type, this study cannot be prescriptive about what types are 'needed', but there is a balance to be struck between, on the one hand, improving choice

in the market and affordability by encouraging flats and terraces, and, on the other hand, preserving the features that residents appreciate about Bradford on Avon at present.

Conclusions- Specialist housing for older people

35. The current specialist housing stock for older persons in Bradford on Avon consists of a total of 296 units of specialist accommodation at present, just over half of which are available for social rent for those in financial need, with the remainder being offered for leasehold market purchase or market rent. Very few, if any, offer significant onsite care.
36. It is projected that there will be an increase of 1,071 individuals in the 75+ age group between 2011 and 2036 in Bradford on Avon, increasing the proportion of people in this age group from 12.1% to 20.4% by the end of NP period.
37. The potential need for specialist housing with some form of additional age restriction or care for older people can be estimated by bringing together data on population projections, rates of disability, and what tenure of housing the current 55-75 cohort occupy in the NA. This can be sense-checked using a toolkit based on national research and assumptions.
38. These two methods of estimating the future need in Bradford on Avon produce a range of 269 to 344 specialist accommodation units that might be required during the Plan period. These estimates are based on the projected growth of the older population, thereby assuming that today's older households are already well accommodated. If this is found not to be the case, there would be justification for aspiring to exceed the range identified here. The rate of provision in Bradford on Avon currently is near to the level suggested by HLIN.
39. It is important to take into consideration the breakdown of levels of care and tenure within the need for specialist housing for older persons. When considering the AECOM calculations outlined in Table 6-8, the majority of the need, at 71.8%, is identified for specialist market housing. Slightly more need is identified for sheltered housing at 58.1% compared to 41.9% extra-care. Extra-care may need to form a higher share given the present lack of this form of accommodation. The greatest sub-category of need was identified for market sheltered housing at 43.9% of the total need. However, this need is for individuals with less severe limitations and market housing is considered the most appropriate for adaptations, so at least some of this need could be met through adaptations or through ensuring that all new housing is accessible and adaptable for people with lower support needs.
40. Given that there is unlikely to be a large volume of additional specialist supply during the Plan period, another avenue open to the Neighbourhood Planning groups is to discuss the standards of accessibility and adaptability in new development to be met in the Local Plan with the LPA. The local level evidence supplied in this report could be used to influence district level policies. Groups may also be able to encourage the adaptation of existing properties through grant schemes and other means (though it is acknowledged that Neighbourhood Plans may have limited influence over changes to the existing stock).

41. The adopted WCS policy 'CP46: Meeting the needs of Wiltshire's vulnerable and older people' provides explicit encouragement for development to accommodate specific groups such as older people. However, the policy does not set specific targets for the proportion of new housing that might be required to national standards for accessibility and adaptability (Category M2 (2)), or wheelchair users (Category M4 (3)). The evidence gathered here would appear to justify applying such a target in the Neighbourhood Plan if this avenue has the support of the LPA.
42. It is relatively common for Local and Neighbourhood Plans to require that all or a majority of new housing meets Category M4(2) standards in response to the demographic shifts being observed nationwide, and the localised evidence gathered here would further justify this. The proportion of new housing that might accommodate those using wheelchairs might be set with reference to the proportion of affordable housing applicants falling into this category and/or evidence from a household survey.
43. While it is important to maximise the accessibility of all new housing, it is particularly important for specialist housing for older people to be provided in sustainable, accessible locations, for a number of reasons, as follows:
 - so that residents, who often lack cars of their own, are able to access local services and facilities, such as shops and doctor's surgeries, on foot;
 - so that any staff working there have the choice to access their workplace by more sustainable transport modes; and
 - so that family members and other visitors have the choice to access relatives and friends living in specialist accommodation by more sustainable transport modes.
44. Alongside the need for specialist housing to be provided in accessible locations, another important requirement is for cost effectiveness and economies of scale. This can be achieved by serving the specialist elderly housing needs arising from a number of different locations and/or Neighbourhood Areas from a single, centralised point (i.e. what is sometimes referred to as a 'hub-and-spoke' model).
45. It is considered that Bradford on Avon is, in broad terms, a suitable location for specialist accommodation on the basis of the accessibility criteria and the considerations of cost-effectiveness above. As such, there is potential for such accommodation to be provided within the Neighbourhood Area (while noting there is no specific requirement or obligation to do so if there is potential to meet need arising from Bradford on Avon in other suitable locations near to but outside the Plan area boundaries). Where it is considered for any reason desirable to meet some of the specialist need outside the Neighbourhood Area boundaries, there will be a degree of overlap between the number of specialist dwellings to be provided and the overall dwellings target for the Neighbourhood Area itself.
46. Wherever specialist housing is to be accommodated, partnership working with specialist developers is recommended, so as to introduce a greater degree of choice into the housing options for older people who wish to move in later life.

Conclusions- Second homes

47. According to the 2011 Census data Bradford on Avon had 4,286 households and 4,445 dwellings in 2011, implying that 3.58% of dwellings had no usual residents. This is similar to the corresponding rate for Wiltshire of 3.86%, both being just below the average for England (4%).
48. When looking at holiday lets eligible for business rates specifically, it is estimated that in 2020/2021, there were 110 premises in Bradford on Avon (MSOA E020006683) categorised as 'other'. Of these, based on county level calculations, 9.2% would be expected to be classed as holiday homes (self-catering), totalling 10 properties. Between 2011 and 2021, the number of properties assumed to be categorised as holiday lets in Bradford on Avon grew from 8 to 10 properties, a 25%.
49. The Steering Group identified that within the parish in recent years, the intensity of holiday lets has increased, with more second homes becoming furnished holiday lets because of grant and tax advantages for small businesses released by government. Therefore, the increase between 2011 and 2021 are likely not to be solely an increase in second homes, but also include the transfer of personal second homes into commercial holiday lets. The data cannot reflect on any trends in the number of second homes that are not let out or not enough to meet the business rates threshold. There is the potential that the Covid-19 pandemic has also had an impact, limiting the number of days it was possible to let out second homes through 2020 and 2021 due to national lockdowns and restrictions. This may therefore have meant that some second homes that were originally let out enough to be eligible to pay business rates were not in these years.
50. Overall levels of second home ownership in the NA were estimated based on difference between the number of households and the number of dwellings in the NA in 2020/2021. This was based on the 2011 Census data and the housing completions data provided by Wiltshire Council and the Mid-2020 population estimates. The results of this exercise imply that there were 303 dwellings (or 'household spaces') with no usual resident household in 2020/2021. Therefore, 6.2% of dwellings had no usual residents and could be assumed to be second homes. This is a significant increase on the proportion of second homes in 2011, which accounted for 3.6% of all dwellings.
51. These moderately higher than average levels of second home ownership in the NA are likely to have had an adverse effect on affordability for local people. A substantial difference between the potential returns on holiday lets and income from the long term private rented sector in the NA may present a clear incentive for property owners to rent their properties as holiday lets as opposed to letting them long terms in the private rented sector. This would have a detrimental impact on affordability as demand may outweigh the available supply.
52. Although the potential income difference is clear to see, there are other factors to be taken into consideration. These include the fact that holiday lets may not be occupied for the whole year, as well as running and maintenance costs (which would be associated with both holiday lets and private rentals), and the greater amount of work

potentially required with holiday lets in terms of weekly cleaning and booking administration.

53. AECOM suggest the rates of potential second homes in the NA may reach the standard of justification to discuss a Principal Residence Policy or similar to limit the increase of second homes within new development. If such a policy is developed, as new data becomes available (e.g. Census 2021 or additional data sources quantifying levels of second home ownership), the group may wish to refine the policy to adapt to any changes in the scale of the market.

2. Context

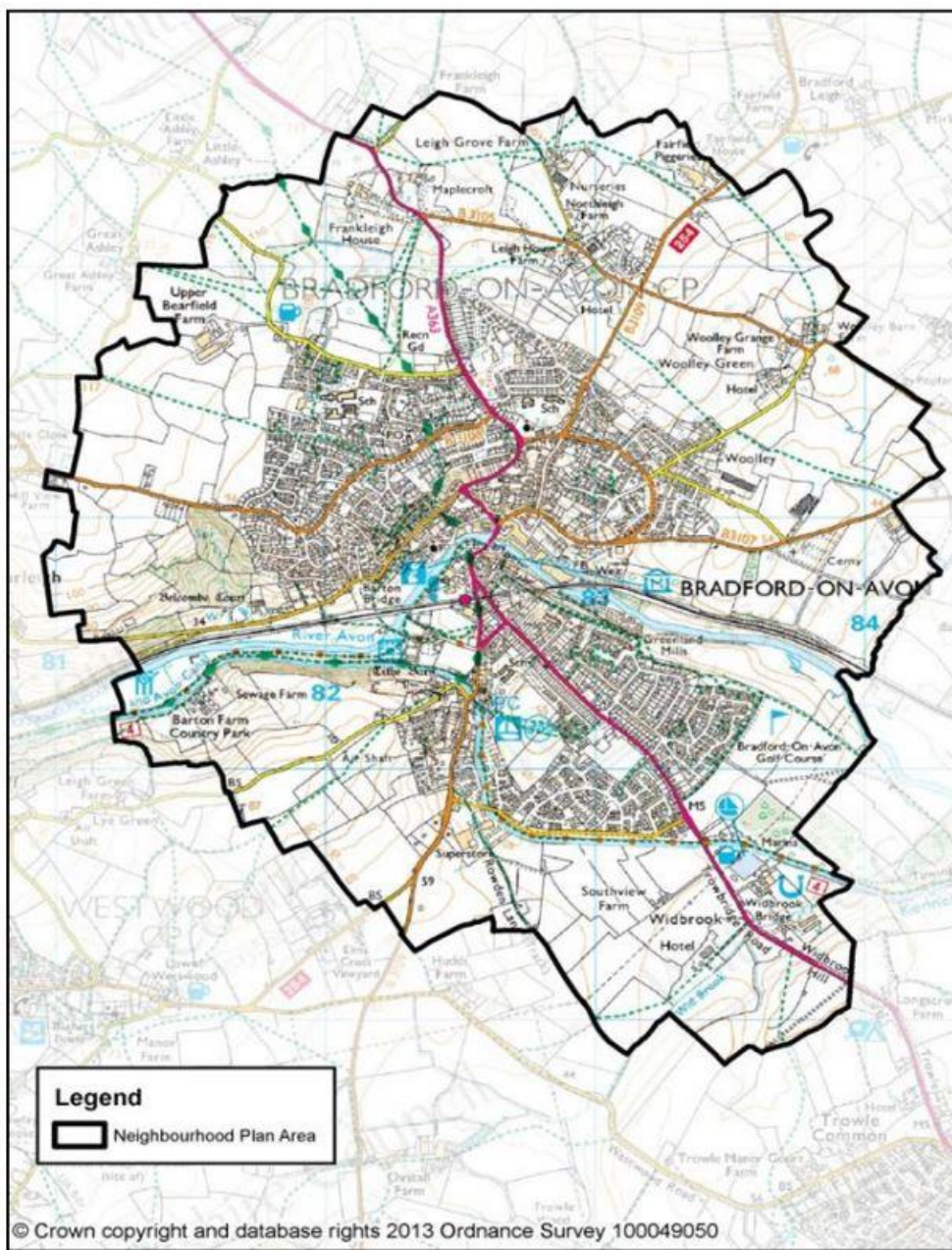
Local context

54. Bradford on Avon is a Neighbourhood Area located in Wiltshire, south west England. The Neighbourhood Area (NA) boundary corresponds to the civil parish of Bradford on Avon and was designated in October 2013.
55. The current Neighbourhood Plan (NP) which covers the period 2013 to 2026, was adopted ('made') in October 2017. The NP is currently undergoing a review which will cover the period 2022 to 2036, therefore comprising a planning period of 14 years. The evidence supplied in this report will look forward to the Plan end date of 2036, but where possible will also provide annualised figures which can be extrapolated to a different term if the Plan period changes.
56. Bradford on Avon is located in the north-west of Wiltshire, at the southern edge of the Cotswolds, around 8 miles from Bath. The River Avon and the Kennet and Avon Canal, run through the town. It is within an hour's drive of Bristol Airport. The main road link, running through its centre, is the A363 which arrives from Trowbridge in the south and then heads north towards Bath. The B3107 runs eastwards from the town centre through Holt to Melksham and beyond. Another route to Bath is provided by the B3108, running west from the top of the northern hillside through Winsley. The B3109 from Frome and the south-west joins the A363 to pass through the town then heads north-east towards Corsham and Chippenham. The railway station is on the Bristol to Salisbury line, which runs east-west across the parish, providing rail links to Bristol and London.
57. For Census purposes, the Neighbourhood Area is made up, like the rest of England, of statistical units called Medium Super Output Areas, Lower Super Output Areas and Output Areas (OAs). While data for the parish is captured in the 2011 Census, for older data the Plan area equates to Medium Super Output Area (MSOA) E02006682, which has been used throughout as a statistical proxy for the NA boundary and which can be interrogated for data from both the 2001 and the 2011 Censuses.
58. The statistics show that in the 2011 Census the NA had a total of 9,402 residents, formed into 4,286 households and occupying 4,445 dwellings. The Office for National Statistics (ONS) produces mid-year population estimates for parishes and wards throughout the country. The mid-2020 population estimate for Bradford on Avon is 10,048 – indicating population growth of around 646 individuals since 2011 equivalent to a 7% increase. It is worth noting that this figure is an estimate only, based on data which is mostly available at local authority level such as administrative registers of births and deaths, data on moves between local authorities, small-area population estimates and official population projections, and not based on a survey count.
59. Wiltshire Council have supplied data on the number of new homes built in the parish since 2010. The total from April 2011 to April 2021 is 443 additional dwellings which brings the potential number of dwellings currently in the parish to 4,888 (10% growth on the 2011 figure). As a sense-check, the latest Valuation Office Agency (VOA) council tax

data shows there are 4,960 dwellings in the NP area; representing an increase of 515 units since 2011 (12% growth). This is a little higher than the estimated population increase in the same period (7%). Two factors help to explain this: one is that the parish population estimate is a projection that does not take into account building rates within the parish specifically; the second is that it is perfectly possible for the number of dwellings to grow faster than the number of residents because of the ageing of the population – with fewer people living in the existing homes for reasons of mortality, adult children moving out and fewer births.

60. A map Plan area appears below in Figure 2-1.

Figure 2-1: Map of the Bradford on Avon Neighbourhood Area¹



Source: [Wiltshire Council](http://www.wiltshire.gov.uk)

¹ Available at www.wiltshire.gov.uk

The Housing Market Area Context

61. Whilst this HNA focuses on the Bradford on Avon neighbourhood area it is important to keep in mind that neighbourhoods are not self contained housing market areas. Housing market areas are usually wider than local authority areas and often stretch across a number of districts or boroughs. This is because housing market areas are inherently linked to the labour market, employment patterns and travel to work areas. In the case of Bradford on Avon, the parish sits within a housing market area which covers Wiltshire Unitary Authority (UA) and Swindon UA². This means that when households who live in these authorities move home, the vast majority move within this geography. The relevant Strategic Housing Market Assessment (SHMA) concluded that Swindon and Wiltshire form a “best fit” to four housing market areas: Swindon, Chippenham, Trowbridge and Salisbury. Bradford on Avon falls within the Trowbridge Housing Market Area (HMA) which in addition to the NA encompasses Trowbridge, Westbury and Warminster. This HMA lies within the A350 and West/ Central Wiltshire Town Functional Economic Market Area (FEMA). The southern part of the HMA also lies with the Salisbury/Amesbury/A303 FEMA³.
62. At the neighbourhood scale it is not possible to be definitive about housing need and demand because neighbourhoods, including Bradford on Avon, are closely linked to other areas. Changes in need or demand in settlements nearby is likely to impact on the neighbourhood. For example, there is a degree of out commuting for work, leisure and shopping to the large urban centres of Bath, Bristol, Swindon and Southampton. In some instances, residents of some of these larger centres tend to commute into the NA and the rest of Wiltshire for work, due to the cheaper housing in these larger settlements⁴.
63. In summary, Bradford on Avon functions within a wider strategic area. As well as fostering good working relationships with the local planning authority Wiltshire Council, it is therefore useful to think about the role of the neighbourhood within the wider area. This HNA can provide evidence to understand this role and the specific features of the neighbourhood within this wider context. Neighbourhood Plans can have a significant impact in shaping their neighbourhoods, enhancing the positive role the neighbourhood play within the wider housing market, or developing policies to change entrenched patterns and improve housing outcomes in the neighbourhood and wider area.

Planning policy context

64. Neighbourhood Plans are required to be in general conformity with adopted strategic local policies.⁵ In the case of Bradford on Avon, the relevant adopted Local Plan for Wiltshire consists of:
 - Wiltshire Core Strategy (WCS), incorporating the saved policies from the District Local Plans. The WCS which was adopted in January 2015 provides the planning

² [Swindon & Wiltshire Strategic Housing Market Assessment \(SHMA\) 2017](#)

³ [Swindon & Wiltshire Joint Spatial Framework Issues Paper \(Nov. 2017\)](#)

⁴ [Wiltshire Core Strategy \(2015\)](#)

⁵ A description of the Basic Conditions of Neighbourhood Planning is available at <https://www.gov.uk/guidance/neighbourhood-planning--#basic-conditions-for-neighbourhood-plan-to-referendum>

policy framework for the whole of Wiltshire, excluding Swindon, up to 2026. The WCS replaced the South Wiltshire Core Strategy and a number of policies from the former district council’s local plans.

65. The WCS and saved policies from the District Local plans, are currently being reviewed through the Wiltshire Local Plan Review (WLPR). This will set out the vision for the future of Wiltshire up to 2036 and will address housing, economic, social and environmental priorities. Wiltshire Council held a consultation on key components of the WLPR in 2021 which covered the scale and distribution of growth across Wiltshire. It also sought views on the role of the Local Plan in helping the County adapt to and mitigate for climate change. The council is currently undertaking further work to review key parts of the evidence base including testing the level of housing need and distribution of growth. The WLPR is expected to be published for pre submission consultation by the second quarter of 2023.

Policies in the adopted local plan

66. Table 2-1 below summarises adopted Local Plan policies that are relevant to housing need and delivery in Bradford on Avon.

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

Policy	Provisions
Core Policy 1: Settlement Strategy	Sets out the settlement hierarchy, designating the principal settlements (Chippenham, Trowbridge and Salisbury) and their strategic role as employment and service centres providing significant levels of jobs and homes and infrastructure. The policy identifies Market Towns ⁶ , which include Bradford on Avon, as having the potential for significant development in jobs and homes to help sustain and enhance their services and facilities and promote better levels of self containment. The remaining growth is allocated to Local Service Centres – smaller towns and larger villages outside the Market Towns – followed by Local Service Centres and Large and Small Villages.
Core Policy 2: Delivery Strategy	Sets out a growth target of <i>at least</i> 42,000 homes across Wiltshire between 2006 and 2026. It provides an indicative requirements for each Principal Settlement, Market Town and Community Area. The policy promotes ‘ <i>a flexible approach</i> ’ allowing “ <i>local communities preparing neighbourhood plans, to respond positively to opportunities without being inhibited by an overly prescriptive, rigid approach</i> ”. The policy allocates a strategic site: Kingston Farm and Moulton Estate in Bradford on Avon for a mixed use development comprising 2-3ha of employment land and a 150 dwellings. Bradford on Avon is allocated an indicative housing requirement of 595 homes.

⁶ These comprise: Amesbury, Bradford on Avon, Calne, Corsham, Devizes, Malmesbury, Marlborough, Melksham, Tidworth and Ludgershall, Warminster, Westbury and Royal Wootton Bassett.

Policy	Provisions
Core Policy 7: Spatial Strategy: Bradford on Avon community Area	<p>The Policy provides more detailed allocation, identifying the main settlements in each Community Area. The Bradford on Avon Community Area comprises:</p> <p>Market Towns: Bradford on Avon, Large Villages: Holt, Westwood and Winsley Small Villages: Limpley Stoke, Monkton Farleigh, Staverton and Wingfield.</p> <p>The policy states that 595 new dwellings should occur at the Bradford on Avon Community Area. This includes 150 dwellings at strategic Kingston Farm site, east of Bradford on Avon. 40% of the 150 units will be AH.</p> <p>The policy states that of the 595 homes allocated in Bradford on Avon, 385 were completed between 2006-14, a further 43 were on specific permitted sites, leaving a residual requirement for 17 units plus the 150 units on the Kingston Farm strategic site (total 167 residual requirement).</p>
Core Policy 43: Providing affordable homes	<p>Sets out Affordable Housing (AH) provision requirement anticipating that around 13,000 affordable homes would be delivered within the plan period. The policy set two AH zones to deliver 30% or 40% AH out of total new development. Bradford on Avon is within the 40% zone. On sites of 5 or more dwellings at least 40% would be AH. Only in exceptional circumstances, where it can be proven that on-site delivery is not possible, will a commuted sum be considered. The tenure is to be negotiated on a site-by-site basis to reflect the nature of development and local needs.</p>
Core Policy 45: Meeting Wiltshire's housing needs	<p>States that housing size and type will be expected to reflect demonstrable community needs. Any variation from the needs identified in the SHMA will need to be justified through new evidence. With regards to AH, evidence would include the council's housing register and local needs surveys.</p>
Core Policy 46: Meeting the needs of Wiltshire's vulnerable and older people	<p>Supports the provision of new housing to meet the specific needs of vulnerable and older people. This includes specialist accommodation such as nursing accommodation, residential homes and extra-care facilities. Such accommodation should be provided in sustainable locations, where there is an identified need, within settlements identified in Core Policy 1 (normally in the Principal Settlements and Market Towns) where there is good access to services and facilities. In exceptional circumstances provision outside but adjacent to Principal Settlements and Market Town would be considered.</p>

Source: [Wiltshire Core Strategy](#)

The emerging local plan

67. Wiltshire Council held consultation on the Wiltshire Local Plan Review between January 2021 and March 2021. The consultation was not on a draft Local Plan but on key components to inform one, including proposals for the scale and distribution of housing and employment growth across Wiltshire. A report to Cabinet on 29 June 2021 provided an initial summary of the main issues that were raised through the consultation and the next steps. Adoption of the Local Plan is anticipated in 2023. The WLPR consultation identified additional residential development sites within Bradford on Avon for further assessment and potential allocation in the Local Plan. Bradford on Avon Town Council understands that the emerging Local Plan will include a requirement of 350 new homes

for the NA. This is also the figure provided in the Wiltshire Local Plan 'Looking to the future' Emerging Spatial Strategy document (2019)⁷.

Quantity of housing to provide

68. The NPPF 2021 (paragraphs 66 and 67) requires Local Authorities to provide neighbourhood groups upon request with a definitive or an indicative number of houses to plan for over the Neighbourhood Plan period.
69. Wiltshire Council has fulfilled that requirement by providing Bradford on Avon with an indicative figure of 595 dwellings to be accommodated within the Community Area over the adopted Core Strategy period (2006-2026). The WLPR consultation includes an indicative figure of 350 new dwellings (2016-2036)⁸.
70. The Wiltshire Local Plan 'Looking to the future Emerging Spatial Strategy' document (2019) indicates that out of the 350 proposed housing allocations in the emerging Local Plan (2016-2036) only 80 remain to be delivered in the NA (the residual requirement as of 1st April 2019). Recent housing data from Wiltshire Council shows that a further 84 dwellings were completed between in 2019/2020 and 2020/2021. This means that the housing growth allocated to Bradford on Avon in the emerging Local Plan has already been fulfilled.

⁷ [Wiltshire Local Plan 'Looking to the future' Emerging Spatial Strategy](#)

⁸ *Ibid*

3. Approach

Research Questions

71. The following research questions were formulated at the outset of the research through discussion with Bradford on Avon Town Council. They serve to direct the research and provide the structure for the HNA.
72. Key challenges raised by the community include the problem of housing affordability and availability, particularly for younger people and a lot of previous council housing is now in private ownership. Mobility is also seen as an issue for people on low incomes. There is considered to be a lack housing suitable for older residents with few care homes and specialist schemes, some of which are outside of the parish. There is also an issue with second home ownership and housing used for commercial and other uses (namely holiday lets).

Tenure and Affordability

73. The neighbourhood planning group would like to understand the needs of the community for housing of varying tenures, as well as the relative affordability of those tenures that should be provided to meet local need now and into the future.
74. This evidence will allow Bradford on Avon to establish the right conditions for new development to come forward that is affordable, both in the broader sense of market housing attainable for first-time buyers, and as Affordable Housing for those who may be currently priced out of the market.

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

Type and Size

75. The neighbourhood planning group is seeking to determine what size and type of housing would be best suited to the local community.
76. The aim of this research question is to provide neighbourhood planners with evidence on the types and sizes needed by the local community. This will help to shape future development so that it better reflects what residents need.
77. While this study is not able to advise on space standards or home configurations, it may reveal imbalances between the available stock and demographic trends.
78. Note, however, that the evidence gathered here takes the current population as its starting point and projects forward trends that exist today. It therefore risks embedding features of the housing stock and occupation patterns that the community may actually wish to change. In that sense, the findings in this report might be viewed as the baseline scenario on top of which the community's objectives and primary evidence should be layered to create a more complete picture and vision for the future.

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

Specialist Housing for Older People

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

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

Second Homes

80. This chapter will review the evidence relating to the presence and growth of second home ownership in Bradford on Avon and draw out any relevant connections to the affordability conclusions made in the preceding chapters and other considerations.

RQ 4: What is the scale and potential impact of the second home sector on the Bradford on Avon housing market, and how might this be addressed through policy?

Relevant Data

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

- Other Office of National Statistics (ONS) datasets providing more up-to-date demographic information;
- ONS population and household projections for future years;
- Valuation Office Agency (VOA) data on the current stock of housing;
- Land Registry data on prices paid for housing within the local market;
- Rental prices from Home.co.uk;
- Local Authority housing waiting list data; and
- Swindon and Wiltshire Strategic Housing Market Assessment 2017 (SHMA)
- Swindon Borough council & Wiltshire Council Local Housing Needs Assessment 2019 (LHNA)

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

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

RQ1: What Affordable Housing (eg social housing, affordable rented, shared ownership, discounted market sale, intermediate rented) and other market tenures should be planned for in the housing mix over the Neighbourhood Plan period?

Introduction

83. This section approaches the question of affordability from two perspectives. First, it examines what tenure options are currently available in the parish and which of them might be most appropriate going forward, based on the relationship between how much they cost and local incomes. Second, it estimates the quantity of Affordable Housing that might be required during the Neighbourhood Plan period. The scale of need for these homes can justify planning policies to guide new development.
84. Tenure refers to the way a household occupies their home. Broadly speaking, there are two categories of tenure: market housing (such as homes available to purchase outright or rent from a private landlord) and Affordable Housing (including subsidised products like social rent and shared ownership). We refer to Affordable Housing, with capital letters, to denote the specific tenures that are classified as affordable in the current NPPF. A relatively less expensive home for market sale may be affordable but it is not a form of Affordable Housing.
85. The definition of Affordable Housing set out in the NPPF 2021 makes clear the Government's commitment to home ownership by broadening the definition to include a range of low-cost housing opportunities for those aspiring to own a home. The NPPF defines Affordable Housing as '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'⁹. The full document further outlines the tenures included in this definition. Those outlined in Table 4-1 would fall under this NPPF definition of Affordable Housing.

⁹ Available here -

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

Table 4-1: Breakdown of Affordable Housing tenures

Tenure	Rent/Ownership	Brief Description
Social Rent	Rent	<p>This tenure is owned by local authorities (what used to be called Council housing) and private registered providers (also known as housing associations).</p> <p>Guideline target rents are determined through the national rent regime and are typically the lowest-cost form of housing available.</p> <p>Households must be eligible on the basis of incomes and other circumstances, and there are usually waiting lists.</p>
Affordable Rent	Rent	<p>This is similar to Social Rent (above). Affordable Rent is not subject to the national rent regime but must have a rent of no more than 80% of the local market.</p> <p>Households must be eligible on the basis of incomes and other circumstances, and there are usually waiting lists.</p>
Rent to Buy	Combination	<p>Rent to Buy is a relatively uncommon tenure. Subsidy allows the occupant to save a portion of their rent to be used to build up a deposit to eventually purchase the home.</p>
Shared Ownership	Ownership	<p>An affordable home ownership product where a purchaser buys part (generally between 25% and 75%, but can be as little at 10%) of the value of the property. The remaining (un-owned part) is rented from a housing association or local authority.</p> <p>This Generally applies to new build properties, but re-sales occasionally become available.</p>
First Homes	Ownership	<p>First Homes are an affordable home ownership product introduced in 2021. Discounts on the market price can be set at 30%, 40%, or 50%.</p> <p>New developments will be required to provide 25% of the Affordable Housing as First Homes. This product is discussed in more detail in the commentary following this table.</p>

86. As part of the effort to expand home ownership, the Government introduced the First Homes product in 2021.¹⁰ Because the First Homes product is new and expected to be an important part of the strategy for improving access to home ownership, it is worth summarising its key features and implications:
- First Homes should be available to buy with a minimum discount of 30% below their full market value (i.e. the value of an equivalent new home);
 - The discount level can be set higher than 30% – at 40% or 50% – where this can be suitably evidenced. The setting and justifying of discount levels can happen at neighbourhood as well as local authority scale;
 - After the discount is applied the initial sale price must not exceed £250,000 (or £420,000 in Greater London), and lower caps can be set locally;
 - Purchasers must be first-time buyers with an income less than £80,000 (or £90,000 in Greater London), and First Homes can be prioritised for local people and/or key workers;
 - They will be subject to legal restrictions ensuring the discount is retained for future occupants, and renting out or sub-letting will not normally be permitted;
 - In addition to setting the discount level, local authorities and neighbourhood planning groups can apply additional criteria, such as a lower income cap, local connection test or prioritisation for key workers through adopted plans, emerging policy or Supplementary Planning Documents.
 - 25% of all homes delivered through section 106 developer contributions on sites enabled through the planning process should be sold as First Homes. In simpler terms, 25% of all subsidised Affordable Housing on mainstream housing developments should be First Homes. This is likely to mean that First Homes will take the place of shared ownership housing in many circumstances, and in some cases may also displace social or affordable rented homes.

Current tenure profile

87. The current tenure profile is a key feature of the Neighbourhood Area (NA). Patterns of home ownership, private renting and affordable/social renting reflect demographic characteristics including age (with older households more likely to own their own homes), and patterns of income and wealth which influence whether households can afford to rent or buy and whether they need subsidy to access housing.
88. Table 4-2 presents data on tenure in Bradford on Avon compared with Wiltshire and England from the 2011 Census, which is the most recent available source of this information.
89. The data shows a significantly higher proportion of owner occupiers (73.8%) in the NP area compared to the rest of the county (67.5%) and England (63.3%). The social rented

¹⁰ The shape that the new First Homes product will take is set out in a Ministerial Statement issued in May 2021, available here: <https://questions-statements.parliament.uk/written-statements/detail/2021-05-24/hlws48>. The relevant update to PPG is available here: <https://www.gov.uk/guidance/first-homes#contents>.

sector (13.8%) is slightly smaller than the rest of the county (14.7%) and the national average (17.7%). The parish also has lower proportion of private rents compared to the wider county (15.4%) and England (16.78%). The relatively low proportions of social and private rents potentially limit the ability of lower income households to reside in the parish.

90. Wiltshire Council’s housing completions data¹¹ for Bradford on Avon, shows 443 net new dwellings have been completed since the 2011 census, and 92 of these were delivered as Affordable Housing (18.3% of total). Therefore, housing delivery since the 2011 census has provided a mix of 81.8% Market housing to 18.3% Affordable housing in Bradford on Avon.
91. There is no current data on the proportion of housing that is rented because the choice to let out a property does not require planning permission or other changes that would be recorded centrally. The 2021 Census will provide the most robust and up-to-date picture of this when the results are released in the coming months. However, it is interesting to observe the change recorded between the 2001 and 2011 Census: in Bradford on Avon the private rented sector expanded by 66% in that period, a rate of growth that is well below that at county level (116%) and the national average (82%). The intercensal data also shows a small increase in social rents (7%) which compares to an increase of 13% in the wider county and a decline of 1% for England. Shared ownership grew by 117% in the NA in the same period albeit from a very small starting base.

Table 4-2: Tenure (households), various geographies, 2011

Tenure	Bradford on Avon	Wiltshire	England
Owned	73.8%	67.5%	63.3%
Shared ownership	0.3%	0.8%	0.8%
Social rented	13.8%	14.7%	17.7%
Private rented	11.0%	15.4%	16.8%

Sources: Census 2011, AECOM Calculations

Affordability

House prices

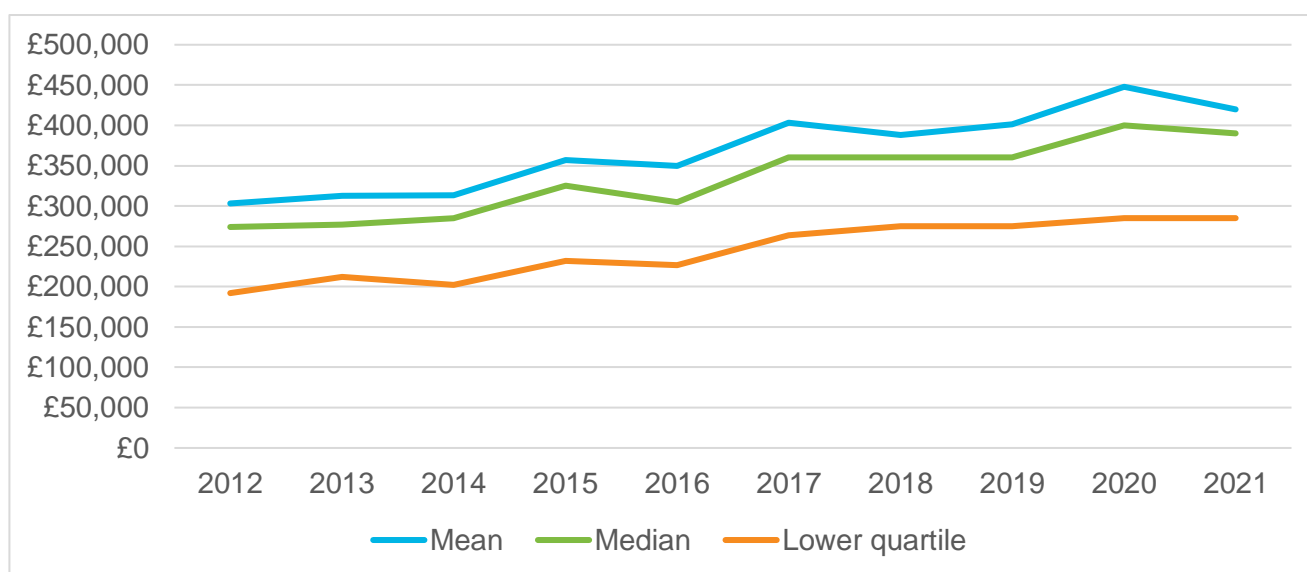
92. House prices provide an indication of the level of demand for homes within an area. The relationship between house prices and incomes determines whether housing is affordable to local households and, to a large extent, what tenure, type and size of home they occupy. Changes in affordability over time can indicate pressures in the housing market. As such, it is useful for the evidence base for plans to examine trends in prices and consider what this reveals about the local housing market.
93. Figure 4-1 looks at selected measures of house prices in Bradford on Avon. It shows that prices have generally risen over the long term despite some year-on-year fluctuations. The mean, median and lower quartile have followed a similar trend line,

¹¹ Supplied via Email from Aidan Clarke of Wiltshire Council

ending 38%, 42% and 48% higher in 2021 than 2012. There is a £105,000 (or 37%) price differential between the lower quartile property price (currently £285,000) and the median price (£390,000).

94. The mean value (£419,715) is derived by adding all the price paid data and then dividing by the total number of properties whereas, the median (£390,000), is the middle value when the data is ordered from smallest to largest. Because the mean captures the average of all the house prices, both high and low, the few outlying data points on the high end cause the mean to increase, making it higher than the median. The mean and median values for the Bradford on Avon are 11.5% and 24.4% higher than the corresponding values for Wiltshire indicating generally higher property prices in the parish than in the wider county.

Figure 4-1: House prices by quartile in Bradford on Avon, 2012-2021



Source: Land Registry PPD

95. Table 4-3 breaks down house prices by type, presenting the median within each type. It shows that semi-detached properties have seen the greatest price growth (57.3%) followed by detached (48.7%) and terraced (45.8%) properties whilst flats grew by 33.1%. Overall, property prices have grown by a substantial 42.3% (all types) over the decade.

Table 4-3: Median house prices by type in Bradford on Avon, 2012-2021

Type	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	Growth
Detached	£380,000	£358,975	£390,000	£435,000	£425,000	£499,950	£465,000	£525,000	£514,000	£565,000	48.7%
Semi-detached	£241,500	£241,000	£250,000	£305,000	£315,000	£340,000	£332,500	£350,000	£330,000	£380,000	57.3%
Terraced	£240,000	£290,000	£310,000	£297,475	£299,975	£317,000	£360,000	£329,088	£385,000	£350,000	45.8%
Flats	£161,500	£170,000	£175,000	£191,000	£197,950	£198,975	£220,000	£270,000	£235,000	£215,000	33.1%
All Types	£274,000	£277,000	£285,000	£325,000	£305,000	£360,500	£360,000	£360,000	£400,000	£390,000	42.3%

Source: Land Registry PPD

Income

96. Household incomes determine the ability of households to exercise choice in the housing market, and consequently the level of need for affordable housing products. Two sources of data are used to examine household incomes in the NA.
97. The first source is ONS's estimates of incomes in small areas. This is locally specific but limited to the overall average income (i.e. it does not provide the average income of lower earners). The average total household income locally was £47,200 in 2018. A map of the area to which this data applies is provided in Appendix A.
98. The second source is ONS's annual estimates of UK employee earnings. This provides lower quartile average earnings (i.e. the income of the lowest 25% of earners). However, it is only available at the Local Authority level. It also relates to individual earnings. While this is an accurate representation of household incomes where there is only one earner, it does not represent household income where there are two or more people earning. Wiltshire's gross individual lower quartile annual earnings were £13,788 in 2020. To estimate the income of households with two lower quartile earners, this figure is doubled to £27,576.
99. It is immediately clear from this data that there is a large gap between the spending power of average earning households and those earning the lowest 25% of incomes, particularly where the household in question has one earner only.

Affordability Thresholds

100. To gain a clearer understanding of local affordability, it is useful to understand what levels of income are required to afford different tenures. This is done using 'affordability thresholds': the estimated amount of annual income required to cover the cost of rent or a mortgage given local housing prices.
101. AECOM has determined thresholds for the income required in Bradford on Avon to buy a home in the open market (average and entry-level prices), and the income required to afford private rent and the range of Affordable Housing tenures as set out in the NPPF. These calculations are detailed and discussed in more detail in Appendix A.
102. The key assumptions made in assessing the affordability of different tenures are explained alongside the calculations, but it is worth noting here that we have assumed that the maximum percentage of household income that should be spent on rent is 30% and that mortgage financing will be offered at a maximum of 3.5 times household income. These are standard assumptions across housing needs assessments at neighbourhood and local authority scale although different approaches are sometimes taken and a case can be made for alternatives.
103. The mortgage multiplier is particularly variable, with multipliers up to 4.5 or even above 5 times income increasingly available, although the actual average in practice tends to be lower, particularly where applicants are dual earning. The Financial Conduct Authority uses 3.5 or more as its standard assumption for single applicants and 2.75 or more for dual applicants. The percentage of income to be spent on rent also varies considerably for individuals, and it is increasingly common for households to dedicate a

larger proportion of their earnings to rent. When considering affordability it is considered good practice to be conservative, and the 30% benchmark is used as ONS’s current standard assumption.

104. While larger mortgages and higher rents may be feasible for individuals, this creates vulnerability to changing economic circumstances and may not be a possibility for many people with the most acute housing needs. Different assumptions would, however, alter the picture of affordability that emerges here. This is another reason interpret the findings with a degree of flexibility.

105. Table 4-4 summarises the estimated cost of each tenure, the annual income required to support these costs within the NA, and whether local incomes are sufficient. The income required column assumes the household already has access to a deposit (which we have assumed to be 10% of the value to be purchased) but does not reflect the possibility that households may already hold equity from an existing property. Although these factors may be crucial to whether housing will be affordable, they are highly dependent on individual circumstances that cannot be anticipated here.

106. The same information is presented as a graph in Figure 4-2 on a subsequent page, with selected measures from the table presented for clarity.

Table 4-4: Affordability thresholds in Bradford on Avon (income required, £)

Tenure	Mortgage value (90% of price)	Annual rent	Income required	Affordable on average incomes? £47,200	Affordable on LQ earnings (single earner)? £13,788	Affordable on LQ earnings (2 earners)? £27,576
Market Housing						
Median House Price	£351,000	-	£100,286	No	No	No
Estimated NA New Build Entry-Level House Price	£277,611	-	£79,318	No	No	No
LQ/Entry-level House Price	£256,500	-	£73,286	No	No	No
LA New Build Median House Price	£287,352	-	£82,101	No	No	No
Average Market Rent	-	£20,748	£69,160	No	No	No
Entry-level Market Rent	-	£15,156	£50,520	No	No	No
Affordable Home Ownership						
First Homes (-30%)	£194,328	-	£55,522	No	No	No
First Homes (-40%)	£166,567	-	£47,591	Marginal	No	No
First Homes (-50%)	£138,806	-	£39,659	Yes	No	No
Shared Ownership (50%)	£138,806	£3,856	£52,511	No	No	No
Shared Ownership (25%)	£69,403	£5,784	£39,108	Yes	No	No
Shared Ownership (10%)	£27,761	£6,940	£31,066	Yes	No	No
Affordable Rented Housing						
Affordable Rent	-	£6,682	£22,251	Yes	No	Yes
Social Rent	-	£5,263	£17,526	Yes	No	Yes

Source: AECOM Calculations

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

Market housing for purchase and rent

108. Thinking about housing for purchase on the open market, it appears that local households on average incomes are unable to access even entry-level homes unless they have the advantage of a very large deposit. Market housing, even with the benefit of a higher than average income, is likely to remain out of reach to most. The median house price would require an annual income that is more than double the current average. Entry level homes would require a 55% uplift to the average annual income to become affordable.

109. Similarly, private renting is generally unaffordable to all income groups in the NA with average market rents requiring a 46% uplift on the NA's average income before they become affordable to average income earners. Affordability is improved if households are able or willing to dedicate a larger proportion of their incomes to rental costs, although this has repercussions for other quality of life aspects and cannot be assumed to suit all individuals' circumstances.

Affordable home ownership

110. All three income groups in Bradford on Avon cannot afford to buy or rent privately as they are typically earning less than £50,520 per year (at which point entry-level rents become affordable). Therefore, affordable rents (including social rents) and a range of affordable home ownership products such as First Homes and shared ownership are likely to be very beneficial to residents of the NA.

111. First Homes are to be offered at a discount of at least 30% on equivalent market prices (i.e. new build, entry-level properties). Local authorities and neighbourhood plan qualifying bodies will have discretion to increase the discount on First Homes to 40% or 50% where there is evidence to suggest this is appropriate.

112. This report has estimated the income required to afford First Homes and tested the implications of 30%, 40% and 50% discount levels. It appears that a 30% discount would not be sufficient make First Homes affordable to average income households whilst a 40% discount would be marginally affordable to average earners. A 50% discount would be required to make First Home affordable to average income households. However, the maximum 50% discount would not be sufficient to extend First Homes to double earning LQ households. On this basis a 50% discount would extend affordable ownership options to the widest number of households (average earners) and may be

a suitable option for the Parish subject other considerations, such as the financial impact of higher discounts on the development overall, which creates the risk that fewer affordable rented homes might be provided. This is a matter for discussion with Wiltshire Council if relevant.

113. Table 4-5 shows the discount required for First Homes to be affordable to the four income groups. The cost of a typical First Home is calculated using an estimate for new build entry-level housing in the NA, as outlined in the Appendix. It is also worth considering the discounts required for some additional price benchmarks. The table above uses the calculated NA new build entry-level house price as the best estimate for the cost of a newly built entry-level home in the area, because this reflects the local market and accounts for the price premium usually associated with newly built housing. However, it is worth thinking about First Homes in relation to the cost of new build prices in the wider area, as well as median and entry-level existing prices locally to get a more complete picture. The discount levels required for these alternative benchmarks are given below.

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

House price benchmark	Mean household income	Single LQ earner	Dual LQ earning household
NA Median House Price	52.9%	86.3%	72.5%
NA Estimated New Build Entry-Level House Price	40.5%	82.6%	65.2%
NA Entry-Level House Price	35.6%	81.2%	62.4%
LA Median New Build House Price	42.5%	83.2%	66.4%

Source: Land Registry PPD; ONS MSOA total household income

114. Shared ownership appears to be more affordable than 30% discounted First Homes (but is broadly accessible to the same group). For example, a 50% equity shared home is more affordable than a 30% discounted First Home. However, 40% and 50% discounted First Homes would be more affordable than a 50% shared ownership home. Government has recently announced that the minimum equity share for shared ownership will fall to 10% of the property value.¹² If this is delivered in the NA, it will make shared ownership easier to access for more people. However, while the income threshold for a 10% equity shared ownership home is lower, this product may not necessarily be more attractive than the alternatives (such as shared ownership at higher equity shares and First Homes) for those who can afford them.

115. The transition from 10% to 100% ownership would be long, and during this period the rent on the 90% unsold value would not be subsidised, meaning that monthly costs for occupants will remain relatively high and the build-up of equity will be relatively slow.

¹² The previous minimum equity share was 25%. This change took effect from 28 June 2021 and transitional arrangements are in place for planning policy documents that are prepared during the implementation timeframe. Changes are also introduced to make the process of staircasing to full ownership more gradual with lower minimum increments of 1%. The ministerial statement confirming and detailing the changes is available here: <https://questions-statements.parliament.uk/written-statements/detail/2021-05-24/hlws48>.

This product would therefore only be a realistic route to full ownership for households prepared to take a long-term view.

116. The income required to access Rent to Buy, a product designed to allow residents to transition from renting to ownership by allowing a discount on the market rent to be used to save a deposit, is assumed to be the same as that required to afford market rents. On that basis, First Homes and shared ownership are more affordable options.

117. These three products need to be considered in relation to what they offer occupants in the long term beyond simply being affordable to access or not.

- First Homes allow for a greater ownership stake in the property, enabling occupiers to benefit from price appreciation over time. Monthly outgoings are also limited to mortgage costs alone, which tend to be cheaper than renting.
- Shared ownership at high equity shares performs a similar function to First Homes, but there are additional costs associated with the rented portion.
- Shared ownership at low equity shares can usually be accessed by lower earning households (than First Homes) and requires a smaller deposit. However, this is a potentially less attractive route to eventual ownership because monthly outgoings remain high. The occupant has to pay a significant monthly rent as well as service charges and other costs, so it can be harder for them to save funds to buy out a greater share in the property over time.
- Rent to Buy requires no deposit, thereby benefitting those with sufficient incomes but low savings. It is more attractive than renting but results in a much slower accumulation of the funds that can provide an eventual route to ownership than the other tenures discussed above.

118. In conclusion, all of these products would provide value to different segments of the local population, with shared ownership at 25% and lower equity share potentially allowing lower earning households to get a foot on the housing ladder, while Rent to Buy is helpful to those with little or no savings for a deposit, and First Homes (especially at 50% discount) may provide a better long-term investment to those who can afford to access it.

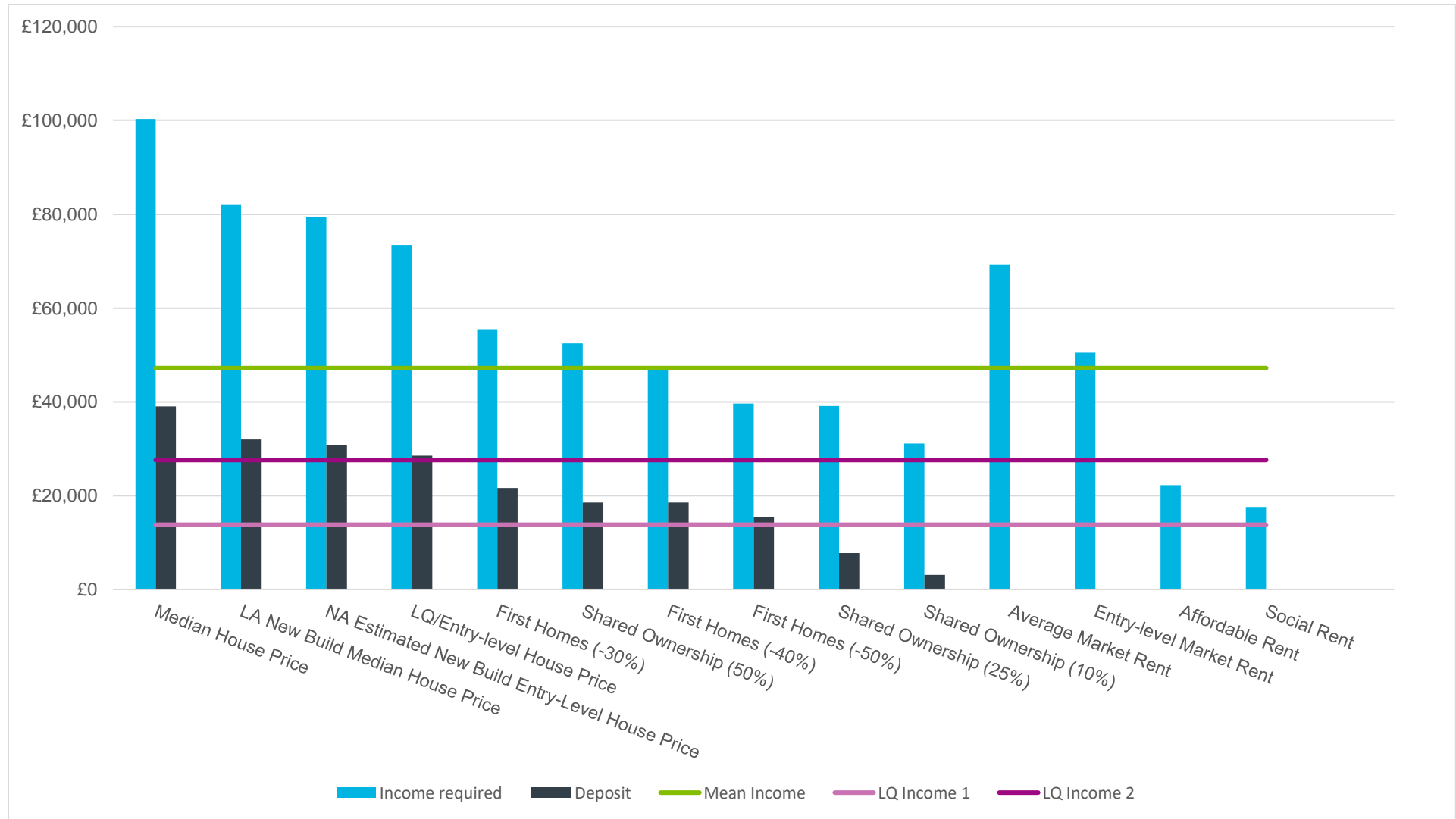
Affordable rented housing

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

120. The evidence in this chapter suggests that the affordable rented sector performs a vital function in Bradford on Avon as the only option for a large segment of those in the greatest need. Social rents are cheaper and would therefore leave households on lower earnings better off and better able to afford their other living costs, such as food and fuel etc. Where households are supported by housing benefit the difference in the cost

of affordable and social rents may be irrelevant as the level of housing benefit flexes according to the rent. This mean that households supported by housing benefit may be no better off in social rented accommodation because they receive a lower rate of housing benefit to cover their rent.

Figure 4-2: Affordability thresholds in Bradford on Avon, income required (additional cost of deposit in black)



Source: AECOM Calculations

Affordable housing- quantity needed

121. The starting point for understanding the need for affordable housing in Bradford on Avon is the relevant Strategic Housing Market Assessment (SHMA) and the Local Housing Need Assessment (LHNA). A SHMA was undertaken by Wiltshire Council and Swindon Borough Council in 2017. This was followed by a LHNA¹³ in 2019 which provided updated total housing need figures. The SHMA estimates the need for affordable housing in Wiltshire based on analysis of the Councils' waiting lists and analysis of other data sets in line with Planning Practice Guidance at the time. It identified the need for 14,600 additional affordable homes for the period 2016-2036 for Wiltshire as a whole. The need is split between 73% social/affordable rents and 27% intermediate tenures.
122. The Swindon Borough Council & Wiltshire Council Local Housing Needs Assessment 2019 (LHNA) updated the SHMA 2017 housing need projections based on the updated NPPF and Planning Guidance. It also took into account the findings of the 2017 Economic Development Needs Assessment (EDNA) for Swindon and Wiltshire (prepared by Hardisty Jones Associates). The LHNA revised Wiltshire's overall housing need to around 45,700 homes over the period 2016-2036, representing a 5.67% uplift on the total housing need estimated in the SHMA 2017 (43,247 units). The LHNA does not provide an updated figure for the Affordable Housing need. However, it is reasonable to assume a that similar uplift to the total AH need would be required to cater for the additional growth. Applying a 5.67% uplift to the total AH need for Wiltshire produces a figure of 15,428.
123. Prorating this figure to Bradford on Avon based on its share of the population (2%) produces 309 affordable dwellings (2% of 15,428) for the period 2016-2036 or 15.5 Affordable Homes per annum. Therefore, over the NP period a total of 217 AH units would be required (15.5x14) in Bradford on Avon. Applying the SHMA tenure split to this figure produces a need for 158 AH for rent and 59 AH for intermediate ownership tenures.
124. Note for comparison that Wiltshire Council's AH waiting list data shows there are currently 68 households on the waiting list with a further 15 on the council's Open Market Register (includes households not considered to be currently in need, but who may want to move into a rented property or may be considered suitable for intermediate tenures).
125. There is no policy or legal obligation on the part either of the Local Authority or Neighbourhood Plan to meet affordable housing needs in full, though there are tools available to the Steering Group that can help ensure that it is met to a greater extent if resources permit (e.g. the ability to allocate sites for affordable housing).
126. It is also important to remember that even after the Neighbourhood Plan is adopted, the assessment of need for Affordable Housing, the allocation of affordable rented housing to those in need, and the management of the housing

¹³ [ORS report: Swindon Borough Council & Wiltshire Council Local Housing Needs Assessment 2019](#)

waiting list all remain the responsibility of the Local Authority rather than the neighbourhood planning group.

Additional SHMA findings

127. The SHMA (2017) notes that 29% of all new forming households (in Swindon and Wiltshire) each are unable to afford their housing costs, which represents 1,717 households each year. There are a further 2,804 households moving into the area each year who are unable to afford housing. This produces a figure of 4,521 new households each year who are unable to afford their housing costs.
128. The SHMA estimates that around 18.9% of residents (Swindon and Wiltshire) commute to jobs outside these two LPA areas. Conversely, around 13.8% of jobs in the Swindon and Wiltshire are filled by people travelling in from other authorities. However, the degree of in/ out commuting differs across the 4 HMAs with a higher number of commuters travelling from Chippenham and Trowbridge (which includes the NA) HMAs and a net gain in commuters travelling to Salisbury and Swindon HMAs.
129. The SHMA noted that house prices in Wiltshire were consistently higher than the rest of England, adding that real house prices in the county were consistently less affordable than England overall.

Affordable Housing policy guidance

130. Wiltshire's adopted policy on this subject, Core Policy 43, sets out affordable housing provision of around 13,000 affordable homes. The policy sets two AH zones to deliver 30% or 40% AH of total new development. In Bradford on Avon which is within the 40% zone, sites of 5 or more dwellings would be required to provide at least 40% AH. Only in exceptional circumstances, where it can be proven that on-site delivery is not possible, will a commuted sum be considered. The tenure is to be negotiated on a site-by-site basis to reflect the nature of development and local needs. Given that Affordable Housing made up just over 18% of new housing in Bradford on Avon over the last decade according to Wiltshire Council's completions figures, it is understood that this target is not usually met on sites in the NA.
131. The overall proportion of housing that must be affordable is not an area of policy that a Neighbourhood Plan can usually influence, but it is worth emphasizing that the HNA finds there to be robust evidence of need for Affordable Housing in the NA, and every effort should be made to maximise delivery where viable.
132. How the Affordable Housing that comes forward through mainstream development sites is broken down into specific tenures – such as the balance between rented tenures and routes to home ownership – is not specified in the adopted Core Strategy; Core policy 43 states that 'tenure will be negotiated on a site-by-site basis to reflect the nature of the development and local needs as set out in Core Policy 45'. Core Policy 45 states that both market and affordable housing must address local housing need 'incorporating a range of different types, tenures and sizes of homes' adding that any variation to the needs

identified in the SHMA must be justified through sound evidence. For AH, such evidence could include the council's housing register and local needs surveys.

133. The SHMA, which estimated AH need in Wiltshire based on analysis of the Councils' waiting lists and other data sets in line with Planning Practice Guidance at the time proposed a split of 73% social/affordable rents to 27% intermediate tenures.
134. The HNA can supply more localized evidence, and this section summarises the factors that might be taken into account before proposing a suggested Affordable Housing tenure mix that might be suitable for Bradford on Avon specifically.
135. The following evidence and considerations may be used as a starting point in the development of policy concerning the Affordable Housing mix:

A. **Evidence of need for Affordable Housing:** Applying the SHMA and LHNA estimates to Bradford on Avon suggests that parish might require up to 169.4 units as affordable/ social rents and 62.6 units as intermediate ownership tenures over the NP period (2022-2036). Both forms of Affordable Housing appear to be valuable in meeting the needs of people on various incomes and are currently provided at lower rates than across the wider county and country. However, these figures are not directly equivalent: the former expresses the identified need of a group with acute needs and no alternative options; the latter expresses potential demand from a group who are generally adequately housed in rented accommodation and may not be able to afford the deposit to transition to ownership.

If the quantity of new housing overall were unlimited, this may be an appropriate affordable tenure mix. However, this is not likely and also not strictly necessary.

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

The adopted WCS allocates 595 new homes within Bradford on Avon. If the Local Plan target of 40% was achieved on every site, up to around 238 affordable homes might be expected in the NA. Given the relatively low threshold (development of 5 or more units) above which the Affordable Housing policy applies, the potential delivery of Affordable Housing is likely to be sufficient to satisfy the total potential demand for Affordable Housing identified here. Having said that, Wiltshire Council's housing completions data shows that only 18% of dwellings completed over the last 10 years were AH.

The Wiltshire Local Plan 'Looking to the future Emerging Spatial Strategy' document (2019) indicates that out of the 350 proposed housing allocations in the emerging Local Plan (2016-2036) only 80 remain to be delivered in the NA (the residual requirement as of 1st April 2019). Recent

housing data from Wiltshire Council shows that a further 84 dwellings were completed between in 2019/2020 and 2020/2021. This means that the housing growth allocated to Bradford on Avon in the emerging Local Plan has already been fulfilled. Looking at completions data since 2016; the start of the emerging Local Plan period, shows that out of the total 238 new dwellings completed, 64 units were AH, equating to just under 27%. Whilst the AH delivery rate has improved since 2016 it is still well below the 40% target identified in the adopted WCS.

As a result, affordable rented housing should have a higher weighting in the tenure mix to ensure that the most acute needs are met as a priority. But given the historic delivery rates it is reasonable to assume that supply will be limited and affordable rented accommodation should be prioritised. The 73% rented 27% ownership guideline mix in the SHMA may offer an appropriate benchmark.

- C. **Government policy (eg NPPF) requirements:** current NPPF policy requires at least 10% of all homes to be delivered for affordable home ownership. For 10% of all housing to be affordable ownership in Bradford on Avon, where 40% of all housing should be affordable, 25% of Affordable Housing should be for affordable ownership. This does comply with the guideline tenure split sought in the WCS (i.e. the SHMA proposed mix of 27% Affordable ownership to 73% affordable rents).

There can be exceptions to this requirement if it would prevent the delivery of other forms of Affordable Housing. Based on the findings of this HNA there is no evidence that meeting the 10% threshold in Bradford on Avon would prejudice the provision of much needed affordable rented homes.

- D. **Local Plan policy:** As noted above, the adopted WCS seeks the tenure split proposed in the SHMA of 73% affordable rents to 27% intermediate ownership tenures.
- E. **First Homes policy:** the Government recently concluded a consultation on the introduction of First Homes (to provide at least 30% discount on new build home prices). The proposals have now been enacted through a ministerial statement. A minimum of 25% of all Affordable Housing secured through developer contributions are now required to be First Homes.

This new minimum requirement may have the effect of displacing other products in any established tenure mix, and will reduce the amount of social or affordable rent if this was proposed to be more than 75% of Affordable Housing. This is not the case in Bradford on Avon.

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

AECOM is aware that some Local Planning Authorities are considering 'top slicing' their affordable housing quota to provide 25% First Homes and then allocating the remaining proportion according to their existing policy tenure split. If this was done in Wiltshire, the remaining 75% of the affordable housing provision would then be apportioned 73% to affordable rent and 23% to affordable home ownership. If this approach is taken, all other things being equal, it would reduce the provision of rented forms of affordable housing since it would effectively protect the provision of other forms of affordable home ownership alongside First Homes. Some LPAs are considering this approach because of the existing business models of registered providers which have relied on shared ownership to cross subsidise affordable rented housing and uncertainty over whether First Homes could replace this model.

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

- F. **Viability:** HNAs cannot take into consideration the factors which affect viability in the neighbourhood area or at the site-specific level. Viability issues are recognised in the Local Plan and it is acknowledged that this may affect the provision of affordable housing, the mix of tenures provided and the discounts that can be sought on First Homes properties.
- G. **Funding:** the availability of funding to support the delivery of different forms of Affordable Housing may also influence what it is appropriate to provide at a particular point in time or on any one site. The neighbourhood planning group may wish to keep this in mind so that it can take up any opportunities to secure funding if they become available.
- H. **Existing tenure mix in Bradford on Avon:** The parish has lower proportion of social rented accommodation compared to the rest of Wiltshire and the national average. Wiltshire Council's AH waiting list data shows there currently 68 households on the waiting list with a further 15 on the council's Open Market Register (includes households not considered to be currently in need, but who may want to move into a rented property or may be considered suitable for intermediate tenures). This suggests that some provision of Affordable Housing would offer a wider choice of homes for local residents and, importantly, may allow those on lower incomes including newly forming households and younger families to remain in, or move into the area.
- I. **Views of registered providers:** it is not within the scope of this HNA to investigate whether it would be viable for housing associations (registered providers) to deliver and manage affordable rented homes in the parish. The funding arrangements available to housing associations will determine rent levels.
- J. **Wider policy objectives:** the neighbourhood planning group may wish to take account of broader policy objectives for Bradford on Avon and/or the

wider county. These could include, but are not restricted to, policies to attract younger households, families or working age people to the NA. These wider considerations may influence the mix of Affordable Housing provided.

136. On the basis of the considerations above, Table 4-6 proposes an indicative Affordable Housing tenure mix that might be sought through Neighbourhood Plan policy.
137. What is proposed in the table follows the SHMA proposed mix with 73% of new Affordable Housing units to be offered as rented tenures and the remaining 27% brought forward as affordable home ownership products. The rationale for following the SHMA mix is that it aligns with priorities suggested by the data for Bradford on Avon, namely that there is a greater current deficit and projected need for affordable rented housing in the parish, as well as the fact that AH delivery is expected to be limited and the most urgent needs should be met as a priority.
138. The affordability thresholds calculations above suggest that among the range of affordable home ownership products, First Homes appears the most affordable and helpful option locally, assuming it can be offered at the appropriate discount level. National policy that First Homes should represent 25% of the affordable mix is suitable here. In the interests of diversity and maximizing choice, a further 2% is allocated to shared ownership rather than more First Homes. Rent to Buy does not feature in the recommended mix as it was considered the least affordable tenure locally.
139. This mix should be viewed as a starting point, based primarily on secondary evidence, which should be reconsidered in light of considerations F to K above, and in particular the views and objectives of the community.
140. Where the neighbourhood planning group wish to develop policy that deviates from that outlined in the Local Plan – either by differing from the headline split between renting and ownership or by specifying a greater level of detail around sub-tenures, it is important that they liaise with Wilshire Council to gather more detailed income and viability information, and to ensure that departures from the local policy context have their support.
141. Another option when developing Neighbourhood Plan policies on tenure splits is to add caveats to the policy in question, to the effect that the precise mix of affordable housing will be considered on the basis of site-by-site circumstances in addition to this evidence.

Table 4-6: Indicative tenure split (Affordable Housing)

Tenure	Indicative mix	Considerations and uncertainties
Routes to home ownership, of which	27%	
First Homes	25%	Product untested so uncertainties around viability, developer, lenders and buyer appetite etc.
Shared ownership	2%	Recently confirmed changes to the model to allow purchases of 10% share - impact on viability unknown. RPs business plans currently reliant on shared ownership model. Impact of displacement by First Homes unknown.
Rent to Buy	0%	Emerging product with popularity and effectiveness as yet unknown. Impact of displacement by First Homes unknown.
Affordable Housing for rent, of which	73%	
Social rent	To be set by Registered Providers	Uncertain how much funding available to support this tenure in local area. Uncertain whether RPs willing to own/manage stock in this area.
Affordable rent	To be set by Registered Providers	Uncertain whether RPs willing to own/manage stock in this area.

Source: AECOM calculations

Conclusions- Tenure and Affordability

142. Bradford on Avon's current tenure mix reveals a high rate of home ownership compared wider averages, at 74%, and a corresponding lack of Affordable Housing and private rented options (despite a 66% increase in the latter category between 2001 and 2011).
143. Home values in the parish have increased markedly over the last decade with the value of an average home (mean) now 38% higher than it was in 2012. An entry-level home currently costs £285,000 with a median home costing 37% more at £390,000. The stock is currently dominated by terraced properties (31.5%) followed by detached (28.6% including bungalows) and semi-detached (23.6%) properties.

Tenure options

144. AECOM has estimated the annual income required to afford various tenures of housing in the NA – each of which is explained in detail in Appendix A. These

thresholds are compared to local incomes to determine which options are the most appropriate for local people going forward. The average household income in Bradford on Avon is £47,200, and the lower quartile income in 2020 was £13,788 (per person).

145. It was found that a household on average income would be unable to afford any of the market housing options; even an entry-level home in the area would require a 55% uplift to average earnings (or a very large deposit) to be affordable. The situation is even worse for dual lower earner households who would be unable to access home ownership through the mainstream market.
146. Private renting is also unaffordable to average income households with entry level rents requiring a 7% uplift in earnings to be affordable. Double lower quartile earners would require an uplift of over 80% to their incomes before they can afford entry-level market rents.
147. Affordable and social rental property is affordable to dual earning lower quartile households but unaffordable to single lower earning households. The latter must therefore either remain in affordable / social rents or in the private rented sector while relying on housing benefit or other support.
148. All three income groups in Bradford on Avon cannot afford to buy or rent privately as they are typically earning less than £50,520 per year (at which point entry-level rents become affordable). Therefore, affordable rents (including social rents) and a range of affordable home ownership products such as First Homes and shared ownership are likely to be very beneficial to residents of the NA.
149. The income required to afford First Homes was estimated above and the implications of 30%, 40% and 50% discount levels tested. The maximum 50% discount would be required to make First Home comfortably affordable to average income households, although would not be sufficient for double lower earning households. On this basis a 50% discount would extend affordable ownership options to the widest number of households (average earners) and may be a suitable option for the Parish subject to other considerations, such as the financial impact of higher discounts on the development overall, which creates the risk that fewer affordable rented homes might be provided. This is a matter for discussion with Wiltshire Council if relevant. Shared ownership tenures were also assessed and found to be more affordable than nominally (30%) discounted First Homes.
150. Given the lack of affordability in the NA's housing market, all affordable home ownership products appear valuable to the local population, with shared ownership at a lower than 25% equity share potentially allowing lower earning households to get a foot on the housing ladder. While rent to buy offers poorer long-term prospects but may be helpful to those with little or no savings for a deposit, and First Homes at a 50% discount provides the best long-term support to those with higher incomes.
151. Affordable rented housing appears affordable to average and dual lower quartile earning households. Single lower quartile income households cannot afford affordable or social rents in the NA. Many such individuals will, if unable to

secure a social rented dwelling and additional subsidy, need to live in a room in a shared house using housing benefit.

152. The evidence in this chapter suggests that the small affordable rented sector performs a vital function in Bradford on Avon as the only option for a large segment of those in the greatest need. Being cheaper for the occupant, social rent performs this function best.

Quantity of Affordable Housing needed

153. The Swindon and Wiltshire SHMA (2017) identified a need for 14,600 affordable homes for rent and affordable homeownership between 2016 and 2036 for Wiltshire. The SHMA also identifies that 73% of new affordable homes should be for rent and 27% should be for intermediate tenures (such as shared ownership or shared equity). The overall housing need was subsequently updated in the Swindon and Wiltshire Local Housing Needs assessment 2019 (LHNA) which assessed the total housing need to be 45,700 for Wiltshire, equating to a 5.67% uplift on the previous SHMA estimate (43,247). Applying the same uplift to the total AH need and pro rating the figure to Bradford on Avon based on its share of Wiltshire's population (2%) produces a requirement for 217 affordable dwellings over the period 2016-2036 or 15.5 affordable dwellings per annum (dpa).
154. Applying the SHMA tenure split to Bradford on Avon produces a potential need for 158 dwellings for affordable rent and 59 units for affordable ownership tenures over the 14 years of the Neighbourhood Plan period. These figures give a reasonable guide to the potential scale of need for Affordable Housing in Bradford on Avon over the NP period.

Policy considerations

155. Wiltshire's adopted policy on this subject (WCS policy C43) requires 30% (in 30% zones) to 40% (in 40% zones, including the NA) of all new housing development of more than 5 dwellings to be affordable. The WCS allocates 595 homes in Bradford on Avon, if all sites met the 5 dwellings threshold up to 238 affordable units might be expected in the NA. This would meet the potential demand estimated above. However, the Council's housing data indicates that only around 81 AH units were delivered over the last 10 years out of a total of 443 dwellings equating to a AH delivery rate of just over 18%. The Wiltshire Local Plan 'Looking to the future Emerging Spatial Strategy' document (2019) indicates that out of the 350 proposed housing allocations in the emerging Local Plan (2016-2036) only 80 remain to be delivered in the NA (the residual requirement as of 1st April 2019). Recent housing data from Wiltshire Council shows that a further 84 dwellings were completed between in 2019/2020 and 2020/2021. This means that the housing growth allocated to Bradford on Avon in the emerging Local Plan has substantially been met.
156. As a result, affordable rented housing should have a higher weighting in the tenure mix to ensure that the most acute needs are met as a priority. But given

the historic delivery rates it is reasonable to assume that supply will be limited and affordable rented accommodation should be prioritised.

157. On the balance of factors listed in the Policy Guidance section of this chapter, the 73% rented 27% ownership guideline mix in the SHMA may offer an appropriate benchmark. Affordable Housing should take the form of 73% rented tenures such as social and affordable rent (preferably the former), with the remaining 27% as affordable routes to home ownership, fulfilling the requirements of the new First Homes product and allowing for some shared ownership or other tenures to widen choice.
158. The rationale for following the SHMA mix (73/27) is that it aligns with the priorities suggested by the data for Bradford on Avon, namely that there is a greater current deficit. Furthermore, and the provision of AH for rent would meet the most urgent needs which should be met as a priority.
159. Wiltshire Council's housing completions data for 2011-2021 shows a net total of 124 AH units delivered. A separate data source breaking down delivery into sub-tenures suggests that 124 affordable homes were delivered as affordable rents and 23 as intermediate tenures – equating to an 81.5% 18.5% affordable rents to affordable ownership split. These figures are gross completions, so do not align with the total above, which is net of demolitions.
160. Table 4-7 summarises Bradford on Avon's position with regards to the expected delivery of Affordable Housing, and how this might ideally be apportioned among sub-categories of tenure to meet local needs over the Plan period. This exercise simply applies the housing requirement figure for the area to the Local Plan policy expectation, and shows the quantities of affordable housing for rent and sale that would be delivered if the tenure mix proposed in this HNA were to be rigidly enforced. In this sense it is hypothetical, and the outcomes in practice may differ, either as a result of measures taken in the neighbourhood plan (e.g. if the group plan for more housing (and therefore more affordable housing) than the local plan, or if the group decide to influence the tenure mix in other ways), or as a result of site-specific constraints.

Table 4-7: Estimated delivery of Affordable Housing in Bradford on Avon

	Step in Estimate	Expected delivery
A	Total target	595
B	Affordable housing quota (%) in LPA's Local Plan	40%
C	Potential total Affordable Housing in NA (A x B)	238
D	Rented % (e.g. social/ affordable rented)	73%
E	Rented number (C x D)	174
F	Affordable home ownership % (e.g. First Homes, Rent to Buy)	27%
G	Affordable home ownership number (C x F)	64

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

161. Given that the proportion of AH delivery over the past decade is less than half the WCS's target rate (40%) it is unlikely that the quantity of demand identified in estimates of the need for affordable housing would be met. Therefore, the policy requirement should be met wherever possible, and for further avenues for delivering greater quantities of Affordable Housing (such as exception sites) to be explored. An extremely high standard of justification which goes beyond the scope of this HNA would be required if NP proposes to exceed the Local Plan policy requirement in the neighbourhood plan, in particular around the issue of what level of Affordable Housing delivery can be financially viable in the NA. Raising the percentage of Affordable Housing required could have the effect of discouraging new building from coming forward altogether. Should the group wish to consider such an option, it is advisable to discuss this with the LPA in the first instance.
162. Affordable housing is typically provided and made financially viable by its inclusion as a proportion of larger market developments, as guided by Local Plan policy. However, if the community wishes to boost the supply of affordable housing, there are other, more proactive routes available for its provision. For example, using community development orders, identifying exception sites or developing community land trusts are all ways of boosting the supply of affordable housing.

5. RQ 2: Type and Size

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

Introduction

164. The evidence in this chapter is intended to give a snapshot of the existing dwelling stock in Bradford on Avon in terms of type and size, as well as some of the population characteristics that tend to influence housing needs. From this, it is possible to develop an understanding of what sort of housing would be appropriate going forward.
165. It is worth emphasising that this evidence assumes that existing demographic and occupation patterns will persist into the future. It can therefore be thought of as the baseline or default scenario, into which the community may wish to intervene – for example to attract a different or more balanced demographic. The recommendations in this chapter, particularly the final suggested size mix, are a starting point that may be adjusted in light of other community objectives and primary evidence.

Existing types and sizes

Background and definitions

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

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

170. As noted in the Context section of this report, there is no perfect data source for the current mix of dwellings in the NA. For some aspects, such as the size mix of homes, adding together Census figures and completions data for the intervening period is highly accurate. For others, such as the type mix of homes, this method is not available and Valuation Office Agency (VOA) must be used. The most appropriate combination of approaches is used in this section.

Dwelling type

171. Census 2011 housing type data is presented below, but this unfortunately cannot be used to fully understand the changes between 2011 and 2020 because Census data counts bungalows within each of the other categories rather than independently (hence the apparent decline in the number of semi-detached properties), and because the Census data relates to a slightly larger proxy area. Note also that VOA data is rounded to the nearest 10 in each dwelling category.

Table 5-1: Accommodation type, Bradford on Avon, 2011 and 2021

Dwelling type	2011 (Census)	2021 (VOA)
Bungalow	-	11.1%
Flat	12.7%	16.1%
Terrace	30.6%	31.5%
Semi-detached	29.5%	23.6%
Detached	27.0%	17.5%
Unknown/other	0.2%	0.2%
Total	100%	100%

Source: ONS 2011, VOA 2021, AECOM Calculations

172. The 2011 census data (Table 5-1) shows terraced and semi-detached properties formed the most common types in the NA with each category constituting around 30% of stock. Detached homes are next most prevalent type at 27%. Flats constituted 13% of stock in 2011 but grew to make up 16% of stock in 2021. The 2021 VOA data shows terraced dwellings are still the most common type of dwelling in Bradford on Avon, followed by semis and detached properties. The apparent decline in semis and detached properties is partly due to the additional bungalow category in the 2021 data which did not constitute a separate category in the 2011 census. The increase in Flats and terraced properties since 2011 indicates a more balanced housing stock in the NA, particularly as flats and terraces are likely to be more affordable than other types of dwellings.

173. Compared to Wiltshire and England, Bradford on Avon area has a higher proportion of terraced properties (Table 5-2). The proportion of detached homes in the NA (18%) is higher than the national average (16%) but substantially smaller than the corresponding figure for Wiltshire as a whole (26%). Flats make up a bigger proportion of stock in the NA (16%) than in the wider county (12%). However, both the NA and Wiltshire have a smaller proportion of flats than the national average (24%).

Table 5-2: Accommodation type, various geographies, 2021

Dwelling type	Bradford on Avon	Wiltshire	England
Bungalow	11.1%	11.7%	9.2%
Flat	16.1%	12.2%	23.7%
Terrace	31.5%	23.4%	26.1%
Semi-detached	23.6%	24.8%	23.7%
Detached	17.5%	26.1%	15.8%
Unknown/other	0.2%	1.8%	1.4%

Source: VOA 2021, AECOM Calculations

Dwelling size

174. In terms of dwelling size, Table 5-3 shows the breakdown of dwellings sizes by number of bedrooms. The table shows the 2011 census data and extrapolates the current situation by adding completions since 2011 (from LPA data) for the period 2011-2021. The last column compares provides the 2021 VOA data for comparison.

175. The census data shows the NA's stock was dominated by 3 bedroom homes (45%) with smaller properties (2 bedroom) forming the next most popular category (21%) followed by larger (4 bedroom) properties (19%). Small (studios/ 1 bedroom) properties make up just under 10% of the stock whilst large (5 bedroom plus) dwellings make up 5% of stock. Whilst the VOA data does not exactly match the extrapolated census plus LPA completions data, both sets show a similar picture, where medium or 3 bedroom properties dominate followed by smaller (2 bedroom) dwellings and larger 4 bedroom units with small homes (1 bedroom) making up around 10% of stock.

176. Therefore, new homes built since the census have continued to favour the existing size distribution with a relatively balanced mix favouring medium-sized properties (as is the case nationwide). However, comparing the proportion of smaller than 3 bedroom dwellings (30.6% in 2011 and 33.5% in 2021) to larger than 3 bedroom (24.2% in 2011 and 19.7% in 2021) shows a trend favouring smaller dwellings in the NA. It appears that recent development may be helping to address some of the affordability issues in Bradford on Avon by providing smaller dwellings which tend to be more affordable.

Table 5-3: Dwelling size (bedrooms), Bradford on Avon, 2011 and 2021

Number of bedrooms	2011 (Census)	Housing delivery 2011-2021 (LPA data)	Current mix (2011 Census + LPA completions data)	2021 (VOA)
Studio	0.1%	-	-	-
1	9.4%	66	10%	9.8%
2	21.1%	173	23%	23.7%
3	45.2%	115	43%	46.6%
4	19.1%	81	19%	16.5%
5+	5.1%	22	5%	3.2%
Unknown	-	-	-	0.2%
Total	100%	446	100%	100%

Source: ONS 2011, VOA 2021, AECOM Calculations

177. Again, it is useful to look at the percentage breakdown of dwelling sizes in comparison with Wiltshire and country (Table 5-4). The NA's housing stock has a higher proportion of medium (3 bedroom) properties (46.6%) than the national average (43.3%). Larger properties (4 bedrooms and over) make up a lower percentage of stock (19.7%) in the NA compared to Wiltshire (23.2%), though both have a higher proportion of larger homes compared to the national average (15.5%). The NA's proportion of smaller (1-2 bedroom) properties is similar to the rest of Wiltshire (around 33%) but lower than the national average (41%). Whilst 1 bedroom properties make up a higher proportion of stock in the NA (9.8%) than in the rest of Wiltshire (7.4%) the proportion is below the national average (12.6%).

Table 5-4: Dwelling size (bedrooms), various geographies, 2021

Number of bedrooms	Bradford on Avon	Wiltshire	England
1	9.8%	7.4%	12.6%
2	23.7%	25.6%	28.4%
3	46.6%	43.6%	43.0%
4	16.5%	18.4%	12.1%
5+	3.2%	4.8%	3.3%

Source: VOA 2021, AECOM Calculations

178. The lower proportion of smaller properties (compared to the national average) is a challenge in terms of affordability, particularly for newly forming households. There may also be a relative lack of smaller homes to which older households may wish to downsize, causing them to remain in larger homes than they want for longer. This will be explored further in relation to over and under occupancy below.

Age and household composition

179. Having established the current stock profile of Bradford on Avon and identified recent changes to it, the evidence gathered below examines the composition and age structure of households living in the NA. Many of these indicators have a bearing on what housing might be needed in future years.

Age structure

180. Table 5-5 shows the most recent estimated age structure of the NA population, alongside 2011 Census figures. The two sets of data from 2011 and 2020 both show the 45-64 age group forming the largest portion of the population (28-30%) however, the second most prevalent group in 2020 is the 65-84 cohort making up almost a quarter of the population (up from around a fifth in 2011), representing a growth of 28% since 2011. The data also shows a substantial decline (-21%) in the 16-24 age group. The highest rate of growth is observed in the oldest age group (85 plus) which grew by 38%.

181. Note that ONS advises exercising caution with population estimates by single year of age (from which this 2020 data has been derived), as patterns of variance and bias make it relatively less accurate compared to Census data.

182. It is also worth noting that only the age structure of the population (individuals) can be brought up to date in this way. The life stage of households, which forms the basis of the subsequent analysis of future dwelling size needs, is not estimated each year. The 2011 Census therefore remains the most accurate basis to use in those areas, and the brief comparison here demonstrates that the change from 2011-2020 has not been so significant as to invalidate the 2011 household data used in modelling later in this chapter.

Table 5-5: Age structure of Bradford on Avon population, 2011 and 2020

Age group	2011 (Census)		2020 (ONS)		% Change
0-15	1,593	17%	1,727	17.2%	8.4%
16-24	752	8%	595	5.9%	-20.9%
25-44	1,940	21%	1,907	19.0%	-1.7%
45-64	2,802	30%	2,810	28.0%	0.3%
65-84	1,945	21%	2,498	24.9%	28.4%
85 and over	370	4%	511	5.1%	38.1%
Total	7,809	100%	10,048	100%	28.7%

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

183. Table 5-6 shows the most recent 2021 Census data for Wiltshire (data not available at NA level) and compares it to the 2011 population. The data shows the two oldest cohorts; 65-85 and 85 plus, growing the most (31% and 27% respectively). The next highest rate of growth is observed for the 45-64 grew by 10%. Conversely, the younger age groups have either declined (e.g. by -4% for the 15-24 cohort) or remained relatively flat. Comparing 2021 data for Wiltshire with the 2020 ONS estimates data for Bradford on Avon shows a similar trend of the oldest age groups growing and the younger age groups either declining or flatlining.

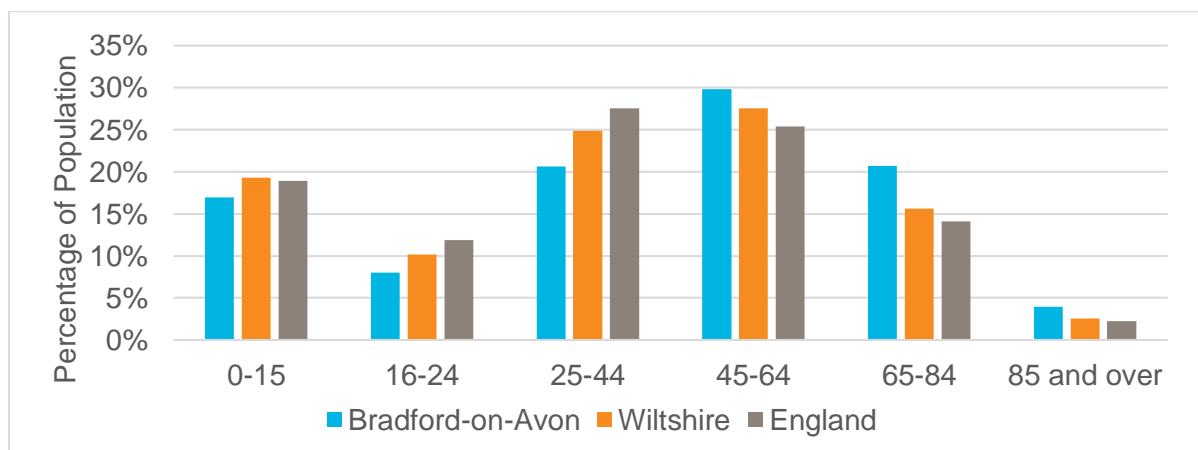
Table 5-6: Age structure of Wiltshire’s population, 2011 and 2021

Age group	2011 Census		Age group	2021 Census		% Change
	Wiltshire			Wiltshire		
0-14	84,848	18.0%	0-14	85,400	17%	1%
15-24	53,917	11.4%	15-24	51,500	10%	-4%
25-44	117,068	24.9%	25-44	119,800	23%	2%
45-64	129,660	27.5%	45-64	142,100	28%	10%
65-84	73,526	15.6%	65-84	96,400	19%	31%
85 and over	11,962	2.5%	85 and over	15,200	3%	27%
Total	470,981	100.0%	Total	510,400	100%	8%

Source: ONS 2021

184. For context, it is useful to look at the parish population structure alongside that of the county and England. Figure 5-1 (using 2011 Census data) shows that the parish was characterised by a relatively older population with a higher proportion of the three oldest age groups (45-64, 65-84 and 85 plus) and a correspondingly lower representation of the three youngest cohorts (0-15, 16-24 and 25-44). If the estimates of how the population has changed since then (discussed above) are accurate, the parish is likely to have diverged still further from the more balanced demographic picture observed at district and national level.

Figure 5-1: Age structure in Bradford on Avon, 2011



Source: ONS 2011, AECOM Calculations

Household composition

185. Household composition (i.e. the combination and relationships of adults and children in a dwelling) is an important factor in the size (and to an extent, the type) of housing needed over the Neighbourhood Plan period. Table 5-7 shows that Bradford on Avon has a larger proportion of single person households than Wiltshire and the national average. Single person households aged 65 and over are also more prevalent in the NA compared to Wiltshire and England. Similarly, there is a greater proportion of older (65 plus) family households in the parish than in the wider geographies. Of those younger than 65 the balance between families with and without children favours those with children. In summary, there are comparatively more people living alone in Bradford on Avon and there are more older households (singles and families).
186. The proportion of 'other' households – i.e. those with multiple household groups such as multigenerational families, housing in multiple occupation (HMOs) and other house share situations sits at a relatively low 3.7%, representing a 4.2% decline in such forms of living since the 2001 census. Other intercensal trends include an increase in the under 65 one person households (observed across the 3 geographies) and a 10% rise in the 65 plus family households in the NA, higher than the corresponding rates of change observed at county (6.3%) and national levels (-2%).
187. Note that non-dependent children refer to households in which adult children are living at home, or which students still call their primary residence despite living for most of the year near to university. A marked increase in this category can be taken to indicate the relative unaffordability of entry-level homes, where young people are financially unable to move out and form their own households. While the data is quite old at this point, it is interesting to observe that this category grew by around 3% between 2001 and 2011 in the parish, a lower rate than the average for Wiltshire (11.8 %) and England (10.6 %).

Table 5-7: Household composition, various geographies, 2011

Household composition		Bradford on Avon	Wiltshire	England
One person household	Total	32.4%	26.7%	30.2%
	Aged 65 and over	17.9%	12.7%	12.4%
	Other	14.5%	14.0%	17.9%
One family only	Total	63.9%	68.1%	61.8%
	All aged 65 and over	12.9%	10.1%	8.1%
	With no children	18.9%	21.3%	17.6%
	With dependent children	23.7%	28.0%	26.5%
	With non-dependent children ¹⁴	8.3%	8.7%	9.6%
Other household types	Total	3.7%	5.2%	8.0%

Source: ONS 2011, AECOM Calculations

Occupancy ratings

188. The tendency of households to over- or under-occupy their homes is another relevant consideration to the future size needs of the NA. A person is considered to under-occupy their home when there are more bedrooms in their home than a family of their size and composition would normally be expected to need. This is expressed as an occupancy rating of +1 or +2, indicating that there is one surplus bedroom or at least two surplus bedrooms (respectively). Over-occupancy works in the same way, with a rating of -1 indicating at least one bedroom too few.
189. Table 5-7 shows that in Bradford on Avon a combined 79% of households live in a home with at least one bedroom more than they would be expected to need and 47% have two or more extra bedrooms. Only 3.4% of households have too few. Over occupancy is particularly prevalent among the 65 plus households (family and single person) and family households under 65 without children.
190. The previous chapter established the high property values in the area, so it would appear that the largest homes are not necessarily occupied by those with the largest families but by those with the financial capacity to do so, irrespective of their household size, or by older people who have not chosen or be able to move to smaller properties. This latter point is confirmed when considering the data for different household types. Around 96% of couples aged over 65 have more bedrooms than they would be expected to need.

¹⁴ Refers to households containing children who are older than 18 e.g students or young working people living at home.

Table 5-8: Occupancy rating by age in Bradford on Avon, 2011

Household type	+2 rating	+1 rating	0 rating	-1 rating
Family 65+	75.5%	20.4%	3.8%	0.4%
Single person 65+	50.1%	30.9%	19.0%	0.0%
Family under 65 - no children	74.2%	19.8%	6.1%	0.0%
Family under 65 - dependent children	23.8%	44.1%	28.6%	3.4%
Family under 65 - adult children	23.3%	51.4%	23.3%	2.0%
Single person under 65	43.7%	28.9%	27.3%	0.0%
All households	47%	32%	19%	1%

Source: ONS 2011, AECOM Calculations

Dwelling mix determined by life-stage modelling

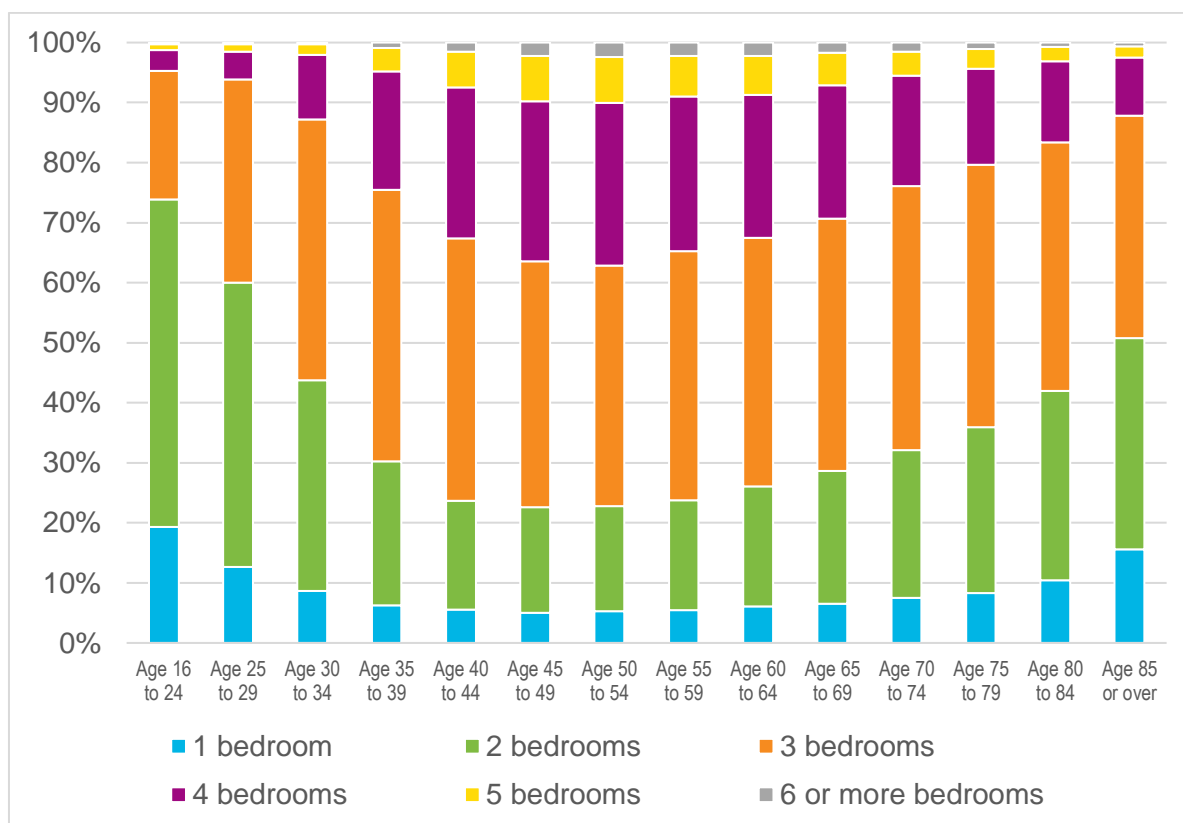
Suggested future dwelling size mix

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

- The starting point is the age distribution of Bradford on Avon households in 2011.
 - The life stage of a household is determined by the age of the household reference person (HRP), a more modern term for the head of household.
 - As noted above, household life stages are not estimated annually, so the older Census data must be used.
- This life stage data is then projected forward to the end of the Plan period by applying the growth rates for each household age group as suggested by the latest household projections. This allows for an estimate of how the parish population might evolve in future.
 - ONS household projections are produced every two years but are only available at Local Authority level. The growth rates are therefore applied to the 2011 starting household age profile of the NA.
- Next, we turn to a Census dataset that shows the occupation patterns or preferences of each household life stage (e.g. what proportion of households aged under 24 tend to live in 1 bedroom homes as opposed to 2, 3 or 4 bedroom homes). This data is mapped to the distribution of the projected NA population for each life stage and each dwelling size category to form a picture of what mix of homes might be appropriate in future.
 - This occupation data is again only available at Local Authority scale, so it does risk embedding any unusual characteristics present in the area.

- The model also assumes that today's occupation patterns persist into the future, which is not a given, particularly with the change in preferences for home working space and other features arising from the Covid-19 pandemic. However, there is no better indication of what those patterns might look like. It is considered more appropriate to adjust the end mix that results from this model to reflect such trends than to build further speculative assumptions into the model.
 - Finally, this 'ideal' future mix of dwelling sizes can be compared to the current stock of housing in the NA. From this we can identify how future development might best fill the gaps.
 - The 2011 dwelling size mix is used for consistency, so any imbalances in new development since then may justify adjustments to the final results.
192. It is important to keep in mind that housing need is not an exact science and this exercise provides an estimate based on demographic trends and occupancy patterns alone. It does not take into account income and wealth, other than in an indirect way through the tendency of households to occupy more or less space than they 'need'. It also does not anticipate changes in how people may wish to occupy their homes in response to social and technological change.
193. The approach therefore embeds existing patterns of occupancy which may or may not be desirable. As such, it is appropriate for the result of this model to be taken as a baseline scenario – what would occur if current trends persisted. It may well be the intention of the community to intervene to produce a different outcome more in line with their interpretation of emerging trends and their place- and community-shaping objectives. Layering these factors on top of the indicative picture provided by this model is considered entirely appropriate for the purpose of drafting neighbourhood plan policy.
194. Before presenting the results of this exercise, it may be interesting to review two of the inputs described above.
195. The first, given as Figure 5-1, sets out the relationship between household life stage and dwelling size for Wiltshire in 2011. This shows how the youngest households occupy the smallest dwellings, before rapidly taking up larger homes as their families expand, and then more gradually downsizing to smaller homes again as they age.

Figure 5-1: Age of household reference person by dwelling size in Wiltshire, 2011



Source: ONS 2011, AECOM Calculations

196. The second dataset of note is the result of applying Local Authority level household projections to the age profile of Bradford on Avon households in 2011 and the updated estimates of household numbers described in the bullets above. Table 5-9 makes clear that population growth can be expected to be driven by the oldest households, with a projected growth rate of 72% for the oldest households while other age groups remain relatively stable. The number of households aged 65 and over is expected to increase by 1,149 to become by far the largest demographic group at 50% of the total.

Table 5-9: Projected distribution of households by age of HRP, Bradford on Avon

Year	Age of HRP and under 24	Age of HRP 24 to 34	Age of HRP 35 to 54	Age of HRP 55 to 64	Age of HRP 65 and over
2011	54	305	1,468	866	1,593
2036	46	326	1,410	972	2,742
% change 2011-2036	-14%	7%	-4%	12%	72%

Source: AECOM Calculations

197. The final result of this exercise is presented in Table 5-10. The model suggests that any new residential development would best address the changing needs of the local population by focusing on smaller (2 bedroom) and mid-sized homes (3 bedroom). There will remain a need for larger 4 and 5 bedroom homes but to a lesser extent than mid sized homes, and few further 1 bedroom properties are needed.

Table 5-10: Suggested dwelling size mix to 2036, Bradford on Avon

Number of bedrooms	Current mix (2011)	Target mix (2036)	Balance of new housing to reach target mix
1 bedroom	9.4%	7.8%	2.0%
2 bedrooms	21.1%	24.8%	37.7%
3 bedrooms	45.2%	41.6%	28.6%
4 bedrooms	19.1%	19.7%	21.5%
5 or more bedrooms	5.1%	6.2%	10.2%

Source: AECOM Calculations

198. Providing smaller and mid-sized homes would both improve Bradford on Avon's offering for younger households who have few options for their next step on the property ladder and enable older households currently under-occupying larger homes to downsize and in so doing potentially create churn in the market (although it is acknowledged that many of the larger historic properties may be too expensive to be taken up by younger local families).

199. However, it is never advisable to restrict future housing delivery too strictly to selected size categories as is suggested here for 1 bedroom properties. For example, Wiltshire Council's affordable housing waiting list data for Bradford on Avon suggests that the 1 and 2 bedroom properties are most in demand.

200. Furthermore the preceding chapter found that affordability is a serious and worsening challenge in the NA. While the provision of Affordable Housing (subsidised tenure products) is one way to combat this, another is to ensure that homes come forward which are of an appropriate size, type and density for local residents' budgets. Continuing to provide smaller homes with fewer bedrooms would help to address this situation.

201. The result of this model is therefore a relatively blunt measure of what could be beneficial given population change and existing imbalances in housing options. It is a starting point for thinking about how best to address the more nuanced needs of the future population. Those wishing to move within or relocate to the area will have a range of circumstances and preferences, and they should be offered a range of choices. As such, it is recommended that priority is given to 2-3 bedroom homes but that this is done to a degree that aligns with the wider objectives of the community and does not limit choice or threaten viability. The evidence in this section represents a starting point for further thought and consultation.

The SHMA findings

202. Table 5-11 reproduces the SHMA (2017) identified need by size and type. The proposed mix, which is for the whole of Wiltshire plus Swindon, shows medium/ 3 bedroom properties forecast to be most in demand over the period 2016-2036, followed 2 bedroom and 4 bedroom dwellings. A small demand (3.7%) is forecast for larger (5 bedroom plus) homes.

Table 5-11: SHMA assessed housing need for Swindon & Wiltshire by number of bedrooms.¹⁵

Type	Bedrooms	Total (2016-2036)	%
Flat	1 bedroom	3,850	5.3%
	2+ bedrooms	3,700	5.1%
House	1-2 bedrooms	12,770	17.5%
	3 bedrooms	38,550	52.8%
	4 bedrooms	11,460	15.7%
	5+ bedrooms	2,670	3.7%
	Total	73,000	

¹⁵ Source: ORS Swindon & Wiltshire Strategic Housing Market Assessment: Figure 77

Conclusions- Type and Size

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

The existing housing stock

204. Bradford on Avon has a housing stock dominated by terraced properties which make up almost a third of stock, followed by semi-detached homes (around a quarter of stock). There are substantially fewer detached homes compared to Wiltshire as whole (both being above the national average). Flats make up 16% of stock, a bigger proportion than for Wiltshire but less than the average for England.

205. In terms of dwelling size, Bradford on Avon has a relatively balanced housing stock with 3 bedroom dwellings being the most common size (around 47% in 2021) which is a little higher than the corresponding levels in the wider geographies (around 43%). Two bedroom homes are the next most common size (around 24%) followed by 4 bedroom dwellings (around 17%). Small (1 bedroom) properties make up 10% of stock, a higher proportion than for Wiltshire (7.4%) but below the national average (12.6%). It appears that recent development may be helping to address some of the affordability issues in Bradford on Avon by providing smaller dwellings.

Demographics

206. The age structure of the population is a key indicator of the future need for housing. Bradford on Avon had a generally older population profile than Wiltshire and England in 2011. The older age brackets have also grown the fastest between the 2011 census and the latest ONS estimates for 2020. Currently around 58% of the population are aged over 45 and 30% are aged over 65. There is a clear trend toward ageing, and current estimates also suggest that young adults are leaving the NA, which may reflect a lack of suitable options for newly forming households.

207. Applying the ONS household projections for Wiltshire to the Bradford on Avon population suggests that by 2036 the 65 and over cohort could increase by 72% from 2011 levels to become by far the dominant group at 50% of the projected total, while the youngest age groups remain stable or decline. It is clear that ageing will be a major driver of housing need in Bradford on Avon going forward, whether older households intend to occupy the same dwellings they currently live in, or perhaps move within the community to a home better suited to the size of their household or their evolving needs.

208. Bradford on Avon has more single person households than the rest of Wiltshire and national average. It also has more households (single and family) aged 65 and over. Of those younger than 65 the balance between families with and without children favours those with children. In summary, there are comparatively more people living alone in Bradford on Avon and there are more older households.
209. Bradford on Avon has a high rate of under-occupancy, with 79% of households living in a home with at least one bedroom more than they would be expected to need (at the time of the last Census). The percentage of people living in homes with fewer bedrooms than they might be expected to need is relatively small at 3.4%.
210. The previous identified high property values in the area, so it would appear that the largest homes are not necessarily occupied by those with the largest families but by those with the financial capacity to do so, irrespective of their household size, or by older people who have not chosen or be able to move to smaller properties. This latter point is confirmed when considering the data for different household types. Around 96% of couples aged over 65 have more bedrooms than they would be expected to need.

The future dwelling mix

211. The results a modelling exercise, which looks at the sizes of dwelling occupied by households at different life stages and projects the growth and decline of those household age groups over the plan period, suggests that new development should be focused on smaller (2 bedroom) and mid-sized homes (3 bedroom). The model also suggests that there will continue to be moderate demand for larger (4 bedroom plus) homes but demand for the smallest homes (1 bedroom) is likely to be very limited.
212. Therefore, new construction should help to boost the supply of 2-3 bedroom homes if the type of development is considered appropriate in terms of character and density. The provision of too many of the smallest (1 bedroom) should be avoided as demand will likely be very limited in the context of current supply. Similarly, the provision of too many larger (5 bedroom plus) homes should be avoided.
213. Small and mid-sized homes would improve affordability as well as the parish's offering for younger households who have few options for their next step on the property ladder. It may also enable older households currently under-occupying larger homes to downsize and in so doing potentially create churn in the market, although it is acknowledged that many of the larger historic properties may be too expensive to be taken up by younger local families.
214. To best meet the needs of the large cohort of older households expected to be present by the end of the Plan period, it should be considered whether the existing options are well tailored to older people's requirements in terms of space, flexibility, quality, location and accessibility. Variety should be sought within the mid-sized homes that come forward in future to attract both newly

forming households on lower budgets and older households with substantial equity from their existing larger homes. Facilitating downsizing among older households may release those larger homes for use by families who need more bedrooms.

215. In terms of dwelling type, this study cannot be prescriptive about what types are 'needed', but there is a balance to be struck between, on the one hand, improving choice in the market and affordability by encouraging flats and terraces, and, on the other hand, preserving the features that residents appreciate about Bradford on Avon at present.

6. RQ 3: Specialist housing for older people

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

Introduction

216. This chapter considers in detail the specialist housing needs of older and disabled people in Bradford on Avon. The level of care associated with specialist housing products can vary widely, and is broadly categorised, in descending order from highest to lowest care level, as follows

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

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

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

219. The specialist housing needs of older people (75+) are assessed below using two methods. The first is a tenure-led projection, based on rates of mobility limitation among this age group and the tenure of housing they currently occupy. The second, included for the purposes of comparison, is based on the Housing Learning and Improvement Network (HLIN) Strategic Housing for Older People (SHOP) tool,¹⁶ which is based on best practice nationally and sets a recommended level of provision per 1,000 head of population.

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

¹⁶ Available at <https://www.housinglin.org.uk/Topics/browse/HousingExtraCare/ExtraCareStrategy/SHOP/SHOPv2/>

as opposed to the projected new households which form the baseline for estimating housing need overall.¹⁷

221. This study covers the need for housing, i.e. buildings that the planning system classifies as Use Class C3 (private dwellings).¹⁸ Residences that fall into Use Class C2 (institutions including prisons, boarding schools and some care homes for the elderly) are not within the scope of this research. Unfortunately, however, the dividing line between care homes for older people that fall into use class C2 and those where accommodation is counted as C3 is blurred. As such, the findings of this chapter may justify the provision of extra-care C3 housing and/or C2 care home units, but it is not possible to state definitively how much of each would be required.

Current supply of specialist housing for older people

222. When determining a final target for the need for specialist dwellings, it is necessary first to take account of current supply. Information on the current stock is collated manually using the search function on the Elderly Accommodation Counsel's Website: <http://www.housingcare.org>.

223. Table 6-1 counts a total of 296 units of specialist accommodation in the Bradford on Avon at present, just over half of which are available for social rent for those in financial need, with the remainder being offered for leasehold market purchase or market rent. The vast majority if not all are offered as sheltered or age restricted housing rather than offering substantial additional onsite care.

224. ONS 2020 population estimates suggest that there are currently around 1,483 individuals aged 75 or over in Bradford on Avon. This suggests that current provision is in the region of 200 units per 1,000 of the 75+ population (a common measure of specialist housing supply).

¹⁷ See Paragraph: 017 Reference ID: 2a-017-20190220, at <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>)

¹⁸ For a full description of Planning Use Classes, please refer to https://www.planningportal.co.uk/info/200130/common_projects/9/change_of_use

Table 6-1: Existing specialist housing for the elderly in Bradford on Avon

	Name	Description	Units	Tenure	Type
1	Abbey Mill	Range of 1, 2 and 3 bedroom flats including mobility and wheelchair standard properties	53	Leasehold and Rent (market)	Age exclusive housing
2	Abbey House	Studio flats includes mobility and wheelchair standard properties	10	Rent (social landlord)	Retirement home
3	Aldhelm Court	and 2 bedroom flats and studios	31	Rent (social landlord)	Retirement housing
4	Cedar Court	1 bedroom flats	26	Rent (social landlord)	Retirement housing
5	Fitzmaurice Place	Flats, houses	42	Leasehold	Retirement housing
6	Lansdowne Place	11 houses and 3 flats. 2 and 3 bedrooms	14	Leasehold	Age exclusive housing
7	Loddon Way	25 bungalows (2 and 3 bedrooms)	25	Rent (social landlord)	Age exclusive housing
8	Lyddieth Court	flats and bungalows, studios and 1 bedroom	24	Rent (social landlord)	Retirement housing
9	St. Catherine's Almhouses	1 bedroom houses	3	Rent (social landlord)	Age exclusive housing
10	St. Margaret's Court	1,2 and 3 bedroom flats	31	Rent (social landlord)	Retirement housing
11	The Ropewalk	Flats and houses, 2 bedroom	37	Leasehold	Retirement housing
12	Abbey Mill	Studio flats includes mobility and wheelchair standard properties	53	Leasehold and Rent (market)	Age exclusive housing

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

Tenure-led projections

225. Turning to determining future need for specialist housing, the first step is to review data on the tenure of households aged 55-75 across Wiltshire, as this is the most recent and smallest geography for which tenure by age bracket data is available.

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

227. According to Table 6-2, the vast majority of 55-75 year olds in Wiltshire in 2011 owned their own homes (80% of households). The remaining 19.8% rented their home, mostly through social renting (11.7%) followed by private rents (6.6%). - It may be surmised that the existing stock of specialist older persons housing in the Bradford on Avon does not cater enough for the owner occupied sector based on Table 6-2. However, this is before taking into consideration mobility limitations specific to the NA and the fact that home adaptations may be more

suitable for households that own their own home than those living in the social rented or private rented sector.

Table 6-2: Tenure of households aged 55-75 in Bradford on Avon, 2011

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

Source: Census 2011

228. The next step is to project how the overall number of older people in Bradford on Avon is likely to change in future, by extrapolating from the ONS Sub-National Population Projections for Wiltshire at the end of the Plan period. The figure must be extrapolated from the Local Authority level data because such projections are not available at neighbourhood level. The results (Table 6-3) show that Bradford on Avon has a bigger proportion of people aged 75 and over than Wiltshire, both in 2011 and in 2036. In this period the proportion of Bradford on Avon residents aged 75 plus is projected to grow from 12.1% of the population in 2011 to over 20.4% in 2036.

Table 6-3: Modelled projection of elderly population in Bradford on Avon by end of Plan period

Age group	2011		2036	
	Bradford on Avon	Wiltshire	Bradford on Avon	Wiltshire
All ages	9,402	470,981	10,801	541,068
75+	1,136	40,418	2,207	78,539
%	12.1%	8.6%	20.4%	14.5%

Source: ONS SNPP 2020, AECOM Calculations

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

230. The people whose needs are the focus of the subsequent analysis are therefore the additional 1,071 individuals expected to join the 75+ age group by the end of the Plan period. This figure should also be converted into households with reference to the average number of people per household with a life stage of 75+ in Wiltshire in 2011 (the smallest and most recent dataset to capture households). In 2011 there were 40,418 individuals aged 75+ and 28,655 households headed by a person in that age group. The average household size is therefore 1.41, and the projected growth of 1,071 people in Bradford on Avon can be estimated to be formed into around 759 households.

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

Table 6-4: Projected tenure of households aged 75+ in Bradford on Avon to the end of the Plan period

Owned	Owned outright	Owned (mortgage) or shared ownership	All rented	Social rented	Private rented	Living rent free
609	426	183	150	89	50	10

Source: Census 2011, ONS SNPP 2020, AECOM Calculations

232. Next, rates of disability by tenure are considered. The tendency for people in rented housing to have higher disability levels is well established. It arises partly because people with more limiting disabilities tend to have lower incomes. It also reflects the fact that as people develop support and care needs they may find that the only suitable and affordable option to them is available in the social rented sector. Table 6-5 presents this data for Bradford on Avon from the 2011 Census. Note that the closest proxy for the 75+ age group in the Census is the 65+ age group. The NA aligns with the assumptions above with the largest proportion of households with their day-to-day activities limited a lot living in the social rented sector, at 35.4% of households.

Table 6-5: Tenure and mobility limitations of those aged 65+ in Bradford on Avon, 2011

Tenure	Day-to-day activities limited a lot		Day-to-day activities limited a little		Day-to-day activities not limited	
All categories	425	18.4%	603	26.1%	1,284	55.5%
Owned Total	307	15.8%	480	24.7%	1,154	59.5%
Owned outright	283	15.9%	436	24.5%	1,063	59.7%
Owned (mortgage) or shared ownership	24	15.1%	44	27.7%	91	57.2%
Rented Total	118	31.8%	123	33.2%	130	35.0%
Social rented	99	35.4%	99	35.4%	82	29.3%
Private rented or living rent free	19	20.9%	24	26.4%	48	52.7%

Source: DC3408EW Health status

233. It is now possible to multiply the projected number of 75+ households occupying each tenure by the rates of mobility limitation for that tenure to arrive at the final tenure-led estimate for specialist housing needs. The number of households falling into potential need for specialist accommodation over the Plan period is 144. (Note that totals may not sum due to rounding.)

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

Table 6-6: AECOM estimate of specialist housing need in Bradford on Avon by the end of the Plan period

Type	Affordable	Market	Total (rounded)
Housing with care (e.g. extra care)	Multiply the number of people across all rented tenures (not just social rent as those aged 65+ who need to rent are overwhelmingly likely to need Affordable Housing) by the percent of occupiers in that tenure who have day to day activity limitations limited a lot	Multiply the number of people across all owner-occupied housing by the percent of occupiers in that tenure who have day to day activity limitations limited a lot	144
	48	96	
Adaptations, sheltered, or retirement living	Multiply the number of people across all rented housing by the percent of occupiers in that tenure who have day to day activity limitations limited a little	Multiply the number of people across all owned housing by the percent of occupiers in that tenure who have day to day activity limitations limited a little	200
	50	151	
Total	97	247	344

Source: Census 2011, AECOM Calculations (Totals may not sum due to founding)

Housing LIN-recommended provision

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

236. It is worth highlighting that the HLIN model suggests that the level of unmet demand for specialist housing for older people of all kinds is approximately 251 units per 1,000 of the population aged 75+. As noted at the start of this chapter, the current rate in Bradford on Avon is roughly 200 units per 1,000 older people, which is below target but not substantially so.

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

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

Source: Housing LIN SHOP Toolkit

237. As Table 6-3 shows, Bradford on Avon is forecast to see an increase of 1,071 individuals aged 75+ by the end of the Plan period. According to the HLIN tool, this translates into need as follows:

- Conventional sheltered housing to rent = $60 \times 1.071 = 64$
- Leasehold sheltered housing = $120 \times 1.071 = 129$
- Enhanced sheltered housing (divided 50:50 between that for rent and that for sale) = $20 \times 1.1071 = 21$
- Extra care housing for rent = $15 \times 1.071 = 16$
- Extra care housing for sale = $30 \times 1.071 = 32$
- Housing based provision for dementia = $6 \times 1.071 = 6$

238. This produces an overall total of 269 (numbers rounded up throughout) specialist dwellings which might be required by the end of the plan period.

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

Table 6-8: HLIN estimate of specialist housing need in Bradford on Avon by the end of the Plan period

Type	Affordable	Market	Total
Housing with care (e.g. extra care)	Includes: enhanced sheltered housing for rent + extra care housing for rent + housing based provision for dementia	Includes: enhanced sheltered housing for sale + extra care housing for sale	76
	33.21	42.86	
Sheltered housing	Conventional sheltered housing for rent	Leasehold sheltered housing	193
	64.29	128.57	
Total (rounded)	98	171	269

Source: Housing LIN, AECOM calculations

SHMA findings

240. The SHMA identified a need for 8,520 older person housing of various types and tenures over the period 2016-2036. This need is divided as follows (Table 6-9)

Table 6-9: SHMA Modelled Demand for Older Person Housing for Wiltshire (2016-2036)

Type	Tenure	Total
Extra Care	Owned	1,340
	Rented	670
Sheltered	Owned	450
	Rented	450
Dementia		270
Leasehold Schemes for the Elderly (LSE)		5,340
	Total	8,520

241. The SHMA also estimates that there will a net increase in the number of households needing wheelchair access of 4,880 dwellings for Swindon and Wiltshire combined by 2036. Of these 3,670 (75% of total) would be required for households aged 75 and over. This will be split into 69% market housing and 31% affordable housing.

Conclusions- Specialist Housing for Older People

242. The current specialist housing stock for older persons in Bradford on Avon consists of a total of 296 units of specialist accommodation at present, just over half of which are available for social rent for those in financial need, with the remainder being offered for leasehold market purchase or market rent. Very few, if any, offer significant onsite care.
243. It is projected that there will be an increase of 1,071 individuals in the 75+ age group between 2011 and 2036 in Bradford on Avon, increasing the proportion of people in this age group from 12.1% to 20.4% by the end of NP period.
244. The potential need for specialist housing with some form of additional age restriction or care for older people can be estimated by bringing together data on population projections, rates of disability, and what tenure of housing the current 55-75 cohort occupy in the NA. This can be sense-checked using a toolkit based on national research and assumptions.
245. These two methods of estimating the future need in Bradford on Avon produce a range of 269 to 344 specialist accommodation units that might be required during the Plan period. These estimates are based on the projected growth of the older population, thereby assuming that today's older households are already well accommodated. If this is found not to be the case, there would be justification for aspiring to exceed the range identified here. The rate of provision in Bradford on Avon currently is near to the level suggested by HLIN.
246. It is important to take into consideration the breakdown of levels of care and tenure within the need for specialist housing for older persons. When considering the AECOM calculations outlined in Table 6-8, the majority of the need, at 71.8%, is identified for specialist market housing. Slightly more need is identified for sheltered housing at 58.1% compared to 41.9% extra-care. Extra-care may need to form a higher share given the present lack of this form of accommodation. The greatest sub-category of need was identified for market sheltered housing at 43.9% of the total need. However, this need is for individuals with less severe limitations and market housing is considered the most appropriate for adaptations, so at least some of this need could be met through adaptations or through ensuring that all new housing is accessible and adaptable for people with lower support needs.
247. Given that there is unlikely to be a large volume of additional specialist supply during the Plan period, another avenue open to the Neighbourhood Planning groups is to discuss the standards of accessibility and adaptability in new development to be met in the Local Plan with the LPA. The local level evidence supplied in this report could be used to influence district level policies. Groups may also be able to encourage the adaptation of existing properties through grant schemes and other means (though it is acknowledged that Neighbourhood Plans may have limited influence over changes to the existing stock).

248. The adopted WCS policy 'CP46: Meeting the needs of Wiltshire's vulnerable and older people' provides explicit encouragement for development to accommodate specific groups such as older people. However, the policy does not set specific targets for the proportion of new housing that might be required to national standards for accessibility and adaptability (Category M2 (2)), or wheelchair users (Category M4 (3)). The evidence gathered here would appear to justify applying such a target in the Neighbourhood Plan if this avenue has the support of the LPA.
249. It is relatively common for Local and Neighbourhood Plans to require that all or a majority of new housing meets Category M4(2) standards in response to the demographic shifts being observed nationwide, and the localised evidence gathered here would further justify this. The proportion of new housing that might accommodate those using wheelchairs might be set with reference to the proportion of affordable housing applicants falling into this category and/or evidence from a household survey.
250. While it is important to maximise the accessibility of all new housing, it is particularly important for specialist housing for older people to be provided in sustainable, accessible locations, for a number of reasons, as follows:
- so that residents, who often lack cars of their own, are able to access local services and facilities, such as shops and doctor's surgeries, on foot;
 - so that any staff working there have the choice to access their workplace by more sustainable transport modes; and
 - so that family members and other visitors have the choice to access relatives and friends living in specialist accommodation by more sustainable transport modes.
251. Alongside the need for specialist housing to be provided in accessible locations, another important requirement is for cost effectiveness and economies of scale. This can be achieved by serving the specialist elderly housing needs arising from a number of different locations and/or Neighbourhood Areas from a single, centralised point (i.e. what is sometimes referred to as a 'hub-and-spoke' model).
252. It is considered that Bradford on Avon is, in broad terms, a suitable location for specialist accommodation on the basis of the accessibility criteria and the considerations of cost-effectiveness above. As such, there is potential for such accommodation to be provided within the Neighbourhood Area (while noting there is no specific requirement or obligation to do so if there is potential to meet need arising from Bradford on Avon in other suitable locations near to but outside the Plan area boundaries). Where it is considered for any reason desirable to meet some of the specialist need outside the Neighbourhood Area boundaries, there will be a degree of overlap between the number of specialist dwellings to be provided and the overall dwellings target for the Neighbourhood Area itself.

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

7. RQ 4: Second Homes

RQ 4: What is the scale and potential impact of the second home sector on the Bradford on Avon housing market, and how might this be addressed through policy?

Introduction

254. Neighbourhood Plan policies controlling second home ownership are typically evidenced by demonstrating a high or rapidly increasing rate of second home ownership within a context of acute affordability challenges and/or serious constraints in the availability of overall housing.
255. The existence of second or holiday homes is not necessarily a problem in and of itself. It becomes a problem when it creates intense competition for local home buyers (or renters), inflates prices, or reduces the resident population to the extent that local services, employment, and community vitality are impacted.
256. Bradford on Avon clearly exhibits these wider challenges, with fairly extreme affordability issues, as demonstrated in Chapter 4. There are also heritage constraints such as designated heritage assets and the Conservation Area in addition to environmental constraints such as the Cotswolds AONB, designated biodiversity sites such as the Cotswolds SSSI, Bath and Bradford on Avon SAC and the Western Wiltshire Green Belt.
257. This section of the HNA gathers the limited available data on the rate of second home ownership in Bradford on Avon that may be used to support policy decisions in this area.

Second and Holiday Homes Data

258. Before looking at second home ownership levels in the NA, it is important to understand the levels of second home ownership, and specifically holiday lets, across the country. According to the English Housing Survey 2018-2019, 2.4 million households in England reported having at least 1 additional residence, with 772,000 of these second homes (including homes primarily used as holiday homes, holiday lets, or working away from home). It was also noted that 57% of second homes were in the UK. Therefore, it could be estimated in 2018/19 that there were at least 440,040 second homes in the UK from households in England, assuming each of 772,000 households above had just 1 additional home.
259. The impact of this nationally is more simply understood as a percentage of all dwellings. There were an estimated 28.9 million dwellings in the UK in 2019¹⁹, meaning that second homes (of which the households that owned them lived in England) in the UK accounted for around 1.5% of total dwellings. The UK second home ownership levels would of course be higher than this when also taking

¹⁹ Collated dwelling stock data from GOV.UK, GOV.WALES, National Records of Scotland, and Northern Ireland Department of Finance.

into account second homes owned by households in Wales, Scotland, and Northern Ireland.

260. Turning to the NA specifically, Bradford on Avon contained 4,286 households and 4,445 dwellings in 2011, implying that there were 159 dwellings (or 'household spaces') with no usual resident household. 3.58% of dwellings therefore had no usual residents.

261. For comparison, the rate of dwellings that had no usual residents across Wiltshire as a whole in 2011 was 3.86%, similar to Bradford on Avon. This may be due to the area's proximity to the Cotswolds AONB and other attractions such as Bath, the Mendip Hills and Salisbury plain.

262. For England, the rate was 4.0%. It is worth noting that across the country (or even the local authority area), dwellings will be empty for different reasons (including being uninhabitable), not just second home ownership. Due to the location of the NA it is assumed that the majority of dwellings without usual residents are second homes, either personal or for holiday let.

263. Another way of gauging the number of holiday homes is to look at the number of properties paying business rates (instead of council tax) in that category. This data is correct to the time of writing but has a number of limitations:

- Most importantly, it only gives an indication of the number of commercially rented holiday homes. A holiday let needs to be available for rent 140 days of the year to reach the threshold for business rates. So only the third subcategory of second/holiday homes below would be captured:
 - Second homes that are never rented and only used by the owner;
 - Holiday homes used by the owner primarily, but also available to rent for part of the year (under 140 days) or rented out informally;
 - Holiday homes with a stronger commercial purpose, available to rent more than 140 days per year.
- In January 2022 the Government tightened the rules on second homes and business rates. This means that as well as being available for rent for at least 140 days a year, from April 2023, second homeowners will have to prove that holiday lets are being rented out for a minimum of 70 days a year to access small business rates relief²⁰.
- It is likely that the holiday homes counted in the business rates data would also be captured as dwellings with no usual residents in the Census, since owners of second homes, including those rented out for holiday lets, are obliged to fill in a Census return. This indicator is therefore only useful for context and for any indication it may give of growth over time.
- This data is only provided for medium and lower super output areas. The data discussed below therefore refers to MSOA E02006682 which is a good proxy for the NA area.

²⁰ Available here: <https://www.gov.uk/government/news/gove-closes-tax-loophole-on-second-homes>

264. There are 110 premises with an 'other' business use in the MSOA in 2021, which indicates any premises not used as retail, office, or industry. The 'other' sector covers a variety of business uses and its makeup will vary according to the nature of the location. In Bradford on Avon it is likely that the dominant use in this category is tourism and hospitality.
265. Across Wiltshire, there were 4,450 rateable premises in the 'other' sector in 2020/2021, of which 410 were category 131 holiday homes (self-catering). That is 9.2% of 'other' premises. It might therefore be estimated that 9.2% of the 110 'other' units in the NA are holiday homes, equating to 10 properties. It is worth noting here, as discussed above, that there may be some difference in second home ownership across the county. Given Bradford on Avon's specific offering, the percentage of dwellings in the 'other' sector that are classified as holiday homes (self-catering) is likely to be higher within the NA than across the wider county.
266. The second and holiday home market is also likely to have changed significantly between 2011 and today.
267. The number of properties in the 'other band for business rates in the Bradford on Avon MSOA grew from 90 units in 2011 to 110 units by 2021. Assuming, in line with Wiltshire's proportions of 'other' units, that 9.2% are holiday homes, this means that we can estimate that the number of holiday homes in Bradford on Avon grew from 8 to 10 between 2011 and 2021. As mentioned above, this only accounts for properties that are registered for business rates and are therefore commercially let out as holiday homes. It is also assumed to be a minimum figure for holiday lets as it is based on the local authority level proportions of holiday lets within the 'other' business rates category. Wiltshire consists of a wide range of settlements, some of which would be unlikely to have holiday lets, meaning the NA proportion is likely to be higher.
268. This estimate of growth requires a caveat. The rate of change in the number of holiday home properties liable for business rates likely expresses the degree of growth in the number of holiday homes overall to some extent, but it might equally express a change in the intensity with which the current holiday homes are let throughout the year (for instance as a result of the introduction of sites like Airbnb).
269. The Town Council identified that within the parish in recent years, the intensity of holiday lets has increased, with more second homes potentially becoming furnished holiday lets because of grant and tax advantages for small businesses released by government. Therefore, the increase between 2011 and 2021 are likely not to be solely an increase in second homes, but also include the transfer of personal second homes into commercial holiday lets. The data cannot reflect on any trends in the number of second homes that are not let out or not enough to meet the business rates threshold.
270. There is the potential that the Covid-19 pandemic has also had an impact, limiting the number of days it was possible to let out second homes through 2020 and 2021 due to national lockdowns and restrictions. This may therefore

have meant that some second homes that were originally let out enough to be eligible to pay business rates were not in these years.

271. In order to estimate the overall levels of second home ownership in the NA, not just those eligible for business rates, the difference between the number of households and the number of dwellings in the NA needs to be considered.

272. Based on the 2011 Census data and the housing completions data provided by Wiltshire Council, it is assumed there were 4,891 dwellings in Bradford on Avon in 2021. Mid-2020 population estimates indicate that the population grew between 2011 and 2020 to 10,048 residents. Taking the 2011 average household size of 2.19 it can be calculated that there were roughly 4,588 households in Bradford on Avon in 2020. If in 2020/2021 there were 4,891 dwellings and 4,588 households in the NA then this implies that there were 303 dwellings (or 'household spaces') with no usual resident household. 6.2% of dwellings therefore can be estimated to have no usual residents and could be assumed to be second homes. This is a significant increase on the proportion of second homes in 2011, which accounted for 3.6% of all dwellings.

273. It is worth noting that this is an estimate of the proportion of second homes in the NA, based on ONS population estimates and the estimated number of dwellings in the NA in 2021. It is however the most accurate way of establishing second home ownership in Bradford on Avon in the present day, in the absence of more targeted data. The release of the 2021 Census in the coming months will provide further clarity on the number of dwellings in the NA with no usual resident household.

274. High levels of second home ownership in the NA, and the demand for second homes, can have an adverse effect on affordability for local people. It may be worth assessing here the difference in potential income between private landlords and holiday lets in Bradford on Avon.

275. In order to undertake this comparison, the number of whole property holiday lets available for a week rental in peak holiday season (July and August) 2023 was established from holiday rental site Airbnb²¹. At this time there were 27 entire property lets available. There is the caveat with this finding that not all holiday lets will be listed on this site, and that some high demand properties may already be fully booked for summer 2023 and therefore not listed. It was then determined the average letting price, which could then be compared to the average rental price of private rented properties in Bradford on Avon This process is outlined below:

- Average nightly cost of Bradford on Avon holiday let (July/ August 2023) from Airbnb properties = £182
- Average weekly cost of above = £182* 7 = £1,274
- Average monthly cost of above = £1,274 * 4 = £5,096

²¹ Search of properties as of 7th August 2022

- Average monthly cost of private rented dwelling in the NA²² = £1,729

276. These calculations show that if a holiday let was rented back-to-back, as it could be in the summer months, the income (exclusive of any related costs) associated with the holiday let would be 195% greater than associated with longer term private rental. This is based on summer prices and occupancy rates that are unlikely to be sustained throughout the year, meaning that actual long-term income is likely to be a lower. Though merely an expression of the potential high end of the profit range, this may go some way to explain the dominance of holiday lets in the NA.
277. The impact on the private rental sector in Bradford on Avon can also be seen to an extent, with the proportion of households living in the private rental sector in the NA increasing by 66% between 2001 and 2011. Although dated this may demonstrate the increase in holiday rentals reducing the provision of private rented housing in the NA. This in turn would have a detrimental impact on affordability as demand may outweigh the available supply.
278. Although the potential income difference is clear to see above, there are other factors to be taken into consideration. These include the fact that holiday lets may not be occupied for the whole year, as well as running and maintenance costs (which would be associated with both holiday lets and private rentals), and the greater amount of work potentially required with holiday lets in terms of weekly cleaning and booking administration.

Policy Considerations

279. It is not only Bradford on Avon within Wiltshire that has housing challenges relating to second home ownership. For example, neighbouring local authorities of Cotswold and Bath and North East Somerset, attract 14.3% and 12.5% (respectively) of second home buyers, ranking 3rd and 5th (respectively) in the top 10 second home hotspots²³.
280. The affordability evidence establishes a clear context of poor and worsening affordability in Bradford on Avon that prevents local people from moving to homes better suited to their needs within the neighbourhood and prevents younger households without significant financial help from accessing suitable housing.
281. It is not possible to establish a precise causal link between second home ownership and declining affordability because rising prices and declining affordability is affected by other factors such as economic growth at the national level. However, given the scale of second home ownership in the NA, AECOM suggest that it is highly likely that the second homes market is a factor in the price in prices and declining affordability in the area. Furthermore, there are substantial financial incentives to let properties to holiday makers rather than long term tenants in the private rented sector.

²² As of 27th July 2022 – covering the private rented sector proxy area discussed in the Appendix.

²³ Source: [Hamptons.co.uk research report: Market Metrics 'Second Home Hotspots'](https://hamptons.co.uk/research-report/market-metrics/second-home-hotspots).

282. The private rented sector in the NA is very small and is likely constrained by the growth of the holiday let and second home market. In the context where new housing development is limited, all other things being equal, the expansion of second homes and holiday lets will reduce the availability of housing for households wishing to live in the area. Reduced availability (or supply) when demand is the same or growing, leads to increased prices and rents.
283. AECOM suggest this may be a reason to apply a Principal Residence Policy or similar in the NA, if the evidence gathered is seen as exceeding the required threshold of justification, about which the LPA may be able to advise. As this policy is developed, if new data becomes available (e.g. Census 2021 or additional data sources quantifying levels of second home ownership), the group may wish to refine the policy to adapt to any changes in the scale of the market.

Conclusions- Second homes

284. According to the 2011 Census data Bradford on Avon had 4,286 households and 4,445 dwellings in 2011, implying that 3.58% of dwellings had no usual residents. This is similar to the corresponding rate for Wiltshire of 3.86%, both being just below the average for England (4%).
285. When looking at holiday lets eligible for business rates specifically, it is estimated that in 2020/2021, there were 110 premises in Bradford on Avon (MSOA E020006683) categorised as 'other'. Of these, based on county level calculations, 9.2% would be expected to be classed as holiday homes (self-catering), totalling 10 properties. Between 2011 and 2021, the number of properties assumed to be categorised as holiday lets in Bradford on Avon grew from 8 to 10 properties, a 25%.
286. The Steering Group identified that within the parish in recent years, the intensity of holiday lets has increased, with more second homes becoming furnished holiday lets because of grant and tax advantages for small businesses released by government. Therefore, the increase between 2011 and 2021 are likely not to be solely an increase in second homes, but also include the transfer of personal second homes into commercial holiday lets. The data cannot reflect on any trends in the number of second homes that are not let out or not enough to meet the business rates threshold. There is the potential that the Covid-19 pandemic has also had an impact, limiting the number of days it was possible to let out second homes through 2020 and 2021 due to national lockdowns and restrictions. This may therefore have meant that some second homes that were originally let out enough to be eligible to pay business rates were not in these years.
287. Overall levels of second home ownership in the NA were estimated based on difference between the number of households and the number of dwellings in the NA in 2020/2021. This was based on the 2011 Census data and the housing completions data provided by Wiltshire Council and the Mid-2020 population estimates. The results of this exercise imply that there were 303 dwellings (or 'household spaces') with no usual resident household in 2020/2021. Therefore,

6.2% of dwellings had no usual residents and could be assumed to be second homes. This is a significant increase on the proportion of second homes in 2011, which accounted for 3.6% of all dwellings.

288. These moderately higher than average levels of second home ownership in the NA are likely to have had an adverse effect on affordability for local people. A substantial difference between the potential returns on holiday lets and income from the long term private rented sector in the NA may present a clear incentive for property owners to rent their properties as holiday lets as opposed to letting them long terms in the private rented sector. This would have a detrimental impact on affordability as demand may outweigh the available supply.
289. Although the potential income difference is clear to see, there are other factors to be taken into consideration. These include the fact that holiday lets may not be occupied for the whole year, as well as running and maintenance costs (which would be associated with both holiday lets and private rentals), and the greater amount of work potentially required with holiday lets in terms of weekly cleaning and booking administration.
290. AECOM suggest the rates of potential second homes in the NA may reach the standard of justification to discuss a Principal Residence Policy or similar to limit the increase of second homes within new development. If such a policy is developed, as new data becomes available (e.g. Census 2021 or additional data sources quantifying levels of second home ownership), the group may wish to refine the policy to adapt to any changes in the scale of the market.

8. Next Steps

Recommendations for next steps

291. This Neighbourhood Plan housing needs assessment aims to provide Bradford on Avon with evidence on a range of housing trends and issues from a range of relevant sources. We recommend that the neighbourhood planners should, as a next step, discuss the contents and conclusions with Wiltshire Council with a view to agreeing and formulating draft housing policies, bearing the following in mind:

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

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

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

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

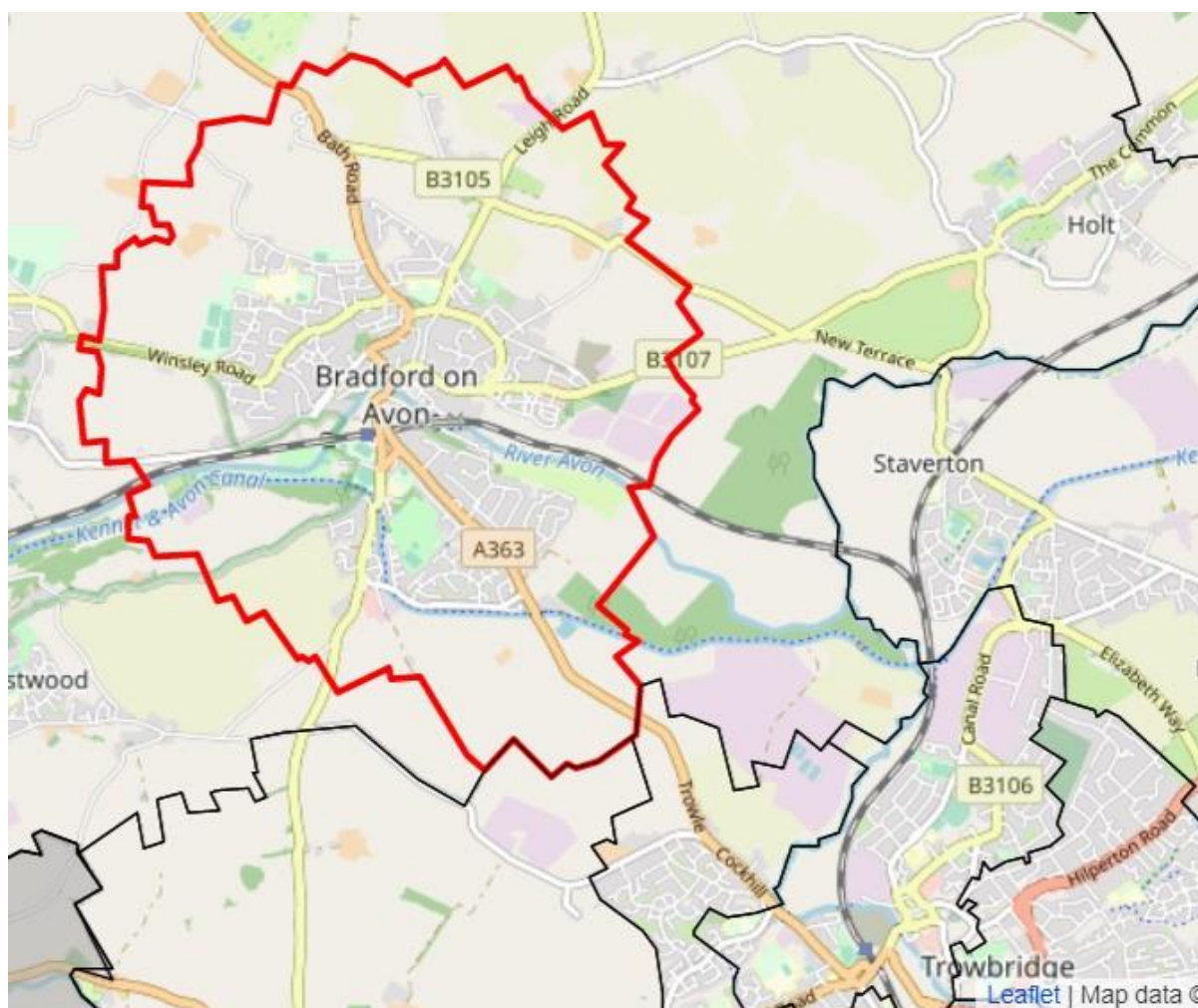
Appendix A : Calculation of Affordability Thresholds

A.1 Assessment geography

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

296. As such, when calculating affordability thresholds, an MSOA needs to be selected that is a best-fit proxy for the Neighbourhood Area. In the case of Bradford on Avon, it is considered that MSOA E02006682 is the closest realistic proxy for the Neighbourhood Area boundary when looking at income data, and as such, this is the assessment geography that has been selected. A map of E02006682 appears in Figure A-1.

Figure A-1: MSOA E02006682 used as a best-fit geographical proxy for the Neighbourhood Area



Source: ONS

A.2 Market housing

297. Market housing is not subsidised and tends to be primarily accessible to people on higher incomes.

298. To determine affordability in market housing, this assessment considers two primary indicators: income thresholds, which denote the maximum share of a family's income that should be spent on accommodation costs, and purchase thresholds, which denote the standard household income required to access mortgage products.

i) Market sales

299. The starting point for calculating the affordability of a dwelling for sale (i.e. the purchase threshold) from the perspective of a specific household is the loan to income ratio which most mortgage companies are prepared to agree. This ratio is conservatively estimated to be 3.5.

300. To produce a more accurate assessment of affordability, the savings required for a deposit should be taken into account in addition to the costs of servicing a mortgage. However, unlike for incomes, data is not available for the savings available to households in Bradford on Avon, and the precise deposit a mortgage provider will require of any buyer will be determined by their individual circumstances and the state of the mortgage market. An assumption is therefore made that a 10% purchase deposit is required and is available to the prospective buyer. In reality it is possible that the cost of the deposit is a greater barrier to home ownership than the mortgage costs.

301. The calculation for the purchase threshold for market housing is as follows:

- Value of a median NA house price (2021) = £390,000;
- Purchase deposit at 10% of value = £39,000;
- Value of dwelling for mortgage purposes = £351,000;
- Divided by loan to income ratio of 3.5 = purchase threshold of £100,286.

302. The purchase threshold for an entry-level dwelling is a better representation of affordability to those with lower incomes or savings, such as first-time buyers. To determine this threshold, the same calculation is repeated but with reference to the lower quartile rather than the median house price. The lower quartile average in 2021 was £285,000 and the purchase threshold is therefore £73,286.

303. It is also worth assessing the purchase threshold for new build homes, since this most closely represents the cost of the new housing that will come forward in future. Land Registry records 6 sales of new build properties in the NA in 2021. There were too few sales in the NA specifically to determine an accurate average for the cost of new build housing in Bradford on Avon. AECOM has calculated an estimate for the cost of new build entry-level housing in the NA in 2021. This is important as it is the expected lower end of the market for new housing in the near future, and it is also the benchmark used for the likely cost

of affordable home ownership products (calculated later in the Appendix). The estimated NA new build entry-level house price is calculated by determining the uplift between all house prices in 2021 across Wiltshire and new build house prices in 2021 in the same area. This percentage uplift is then applied to the 2021 lower quartile house price in the NA to give an estimated NA new build entry-level house price of £308,457 and purchase threshold of £79,318.

304. In order to provide a comparison with the wider local authority area, it is helpful to also look at the cost of new build housing across Wiltshire in 2021. The median cost of new build dwellings in Wiltshire was £319,280 with a purchase threshold of £82,101. This is around 3.5% higher than the estimated NA new build entry-level house price of £308,457.

ii) Private Rented Sector (PRS)

305. Income thresholds are used to calculate the affordability of rented and affordable housing tenures. It is assumed here that rented housing is affordable if the annual rent does not exceed 30% of the household's gross annual income.

306. This is an important assumption because it is possible that a household will be able to afford tenures that are deemed not affordable in this report if they are willing or able to dedicate a higher proportion of their income to housing costs. It is becoming increasingly necessary for households to do so. However, for the purpose of planning it is considered more appropriate to use this conservative lower benchmark for affordability on the understanding that additional households may be willing or able to access housing this way than to use a higher benchmark which assumes that all households can afford to do so when their individual circumstances may well prevent it.

307. The property website [Home.co.uk](https://www.home.co.uk) shows rental values for property in the Neighbourhood Area.

308. According to [home.co.uk](https://www.home.co.uk), there were 6 properties for rent at the time of search in July 2022, with an average monthly rent of £1,729. There were 2 two-bed properties listed, with an average price of 1,263 per calendar month.

309. The calculation for the private rent income threshold for entry-level (2 bedroom) dwellings is as follows:

- Annual rent = £1,263x 12 = £15,156;
- Multiplied by 3.33 (so that no more than 30% of income is spent on rent) = income threshold of £50,520.

310. The calculation is repeated for the overall average to give an income threshold of £69,160.

A.3 Affordable Housing

311. There are a range of tenures that constitute the definition of Affordable Housing within the NPPF 2021: social rent and affordable rent, discounted market sales housing, and other affordable routes to home ownership. More recently, a new

product called First Homes has been introduced in 2021. Each of the affordable housing tenures are considered below.

i) Social rent

312. Rents in socially rented properties reflect a formula based on property values and average earnings in each area, resulting in substantial discounts to market rents. As such, this tenure is suitable for the needs of those on the lowest incomes and is subject to strict eligibility criteria.
313. To determine social rent levels, data and statistical return from Homes England is used. This data is only available at the LPA level so must act as a proxy for Bradford on Avon. This data provides information about rents and the size and type of stock owned and managed by private registered providers and is presented for Wiltshire in the Table A-1.
314. To determine the income needed, it is assumed that no more than 30% of income should be spent on rent. This is an assumption only for what might generally make housing affordable or unaffordable – it is unrelated to the eligibility criteria of Affordable Housing policy at Local Authority level. The overall average across all property sizes is taken forward as the income threshold for social rent.

Table A-1: Social rent levels (£)

Size	1 bed	2 beds	3 beds	4 beds	All
Average social rent per week	£86.42	£98.54	£108.83	£120.82	£101.21
Annual average	£4,494	£5,124	£5,659	£6,283	£5,263
Income needed	£14,964	£17,063	£18,845	£20,921	£17,526

Source: Homes England, AECOM Calculations

ii) Affordable rent

315. Affordable rent is controlled at no more than 80% of the local market rent. However, registered providers who own and manage affordable rented housing may also apply a cap to the rent to ensure that it is affordable to those on housing benefit (where under Universal Credit the total received in all benefits to working age households is £20,000).
316. Even an 80% discount on the market rent may not be sufficient to ensure that households can afford this tenure, particularly when they are dependent on benefits. Registered Providers in some areas have applied caps to larger properties where the higher rents would make them unaffordable to families under Universal Credit. This may mean that the rents are actually 50-60% of market levels rather than 80%.
317. Data on the most realistic local affordable rent costs is obtained from the same source as social rent levels for Wiltshire. Again it is assumed that no more than 30% of income should be spent on rent, and the overall average is taken forward.

318. Comparing this result with the average 2 bedroom annual private rent above indicates that affordable rents in the NA are actually closer to 33.8% of market rates than the maximum of 80%, a feature that is necessary to make them achievable to those in need.

Table A-2: Affordable rent levels (£)

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

Source: Homes England, AECOM Calculations

iii) Affordable home ownership

319. Affordable home ownership tenures include products for sale and rent provided at a cost above social rent, but below market levels. The three most widely available are discounted market housing (a subset of which is the new First Homes product), shared ownership, and Rent to Buy. These are considered in turn below.

320. In paragraph 65 of the NPPF 2021, the Government introduces a recommendation that “where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership.” The recently issued Ministerial Statement and updates to PPG state that 25% of all Affordable Housing should be First Homes – the Government’s new flagship discounted market sale product. When the NPPF is next updated, it is expected that the 10% affordable home ownership requirement referenced above may be replaced by the First Homes requirement.

First Homes

321. Whether to treat discounted market housing as affordable or not depends on whether discounting the asking price of new build homes of a size and type suitable to first time buyers would bring them within reach of people currently unable to buy market housing.

322. The starting point for these calculations is therefore the estimated cost of new build entry-level housing in the NA noted above of £308,457.

323. For the minimum discount of 30% the purchase threshold can be calculated as follows:

- Value of a new home (estimated NA new build entry-level) = £308,457;
- Discounted by 30% = £215,920;
- Purchase deposit at 10% of value = £21,592;
- Value of dwelling for mortgage purposes = £194,328;
- Divided by loan to income ratio of 3.5 = purchase threshold of £55,522.

324. The income thresholds analysis in the Tenure and Affordability chapter also compares local incomes with the costs of a 40% and 50% discounted First Home. This would require an income threshold of £47,591 and £39,659 respectively.
325. All of the income thresholds calculated here for First Homes are below the cap of £80,000 above which households are not eligible.
326. Note that discounted market sale homes may be unviable to develop if the discounted price is close to (or below) build costs. Build costs vary across the country but as an illustration, the build cost for a 2 bedroom home (assuming 70 sq. m and a build cost of £1,750 per sq. m²⁴) would be around £122,500. This cost excludes any land value or developer profit. This would not appear to be an issue in Bradford on Avon.

Shared ownership

327. Shared ownership involves the purchaser buying an initial share in a property, typically of between 25% and 75% (but now set at a minimum of 10%), and paying rent on the share retained by the provider. Shared ownership is flexible in two respects, in the share which can be purchased and in the rental payable on the share retained by the provider. Both of these are variable. The share owned by the occupant can be increased over time through a process known as 'staircasing'.
328. In exceptional circumstances (for example, as a result of financial difficulties, and where the alternative is repossession), and at the discretion of the provider, shared owners may staircase down, thereby reducing the share they own. Shared equity is available to first-time buyers, people who have owned a home previously and council and housing association tenants with a good credit rating whose annual household income does not exceed £80,000.
329. To determine the affordability of shared ownership, calculations are again based on the estimated costs of new build housing as discussed above. The deposit available to the prospective purchaser is assumed to be 10% of the value of the dwelling, and the standard loan to income ratio of 3.5 is used to calculate the income required to obtain a mortgage. The rental component is estimated at 2.5% of the value of the remaining (unsold) portion of the price. The income required to cover the rental component of the dwelling is based on the assumption that a household spends no more than 30% of the income on rent (as for the income threshold for the private rental sector).
330. The affordability threshold for a 25% equity share is calculated as follows:
- A 25% equity share of £308,457 is £77,114;
 - A 10% deposit of £7,711 is deducted, leaving a mortgage value of £69,403;
 - This is divided by the loan to value ratio of 3.5 to give a purchase threshold of £19,829;

²⁴ It is estimated that in 2022, build costs for a house are between £1,750 and £3,000 per square metre - <https://urbanistarchitecture.co.uk/cost-to-build-a-house-uk/>

- Rent is charged on the remaining 75% shared ownership equity, i.e. the unsold value of £231,343;
- The estimated annual rent at 2.5% of the unsold value is £5,784;
- This requires an income of £19,279 (annual rent multiplied by 3.33 so that no more than 30% of income is spent on rent).
- The total income required is £39,108 (£19,829 plus £19,279).

331. The same calculation is repeated for equity shares of 10% and 50% producing affordability thresholds of £31,066 and £52,511 respectively.

332. All the equity options above require income thresholds below the £80,000 cap for eligible households.

Rent to Buy

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

Help to Buy (Equity Loan)

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

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

Appendix B : Housing Needs Assessment Glossary

Adoption

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

Affordability

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

Affordability Ratio

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

Affordable Housing (NPPF Definition)

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

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

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

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

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

Affordable rented housing

Rented housing let by registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is not subject to the national rent regime but is subject to other rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable). The national rent regime is the regime under which the social rents of tenants of social housing are set, with particular reference to the Guide to Social Rent Reforms (March 2001) and the Rent Influencing Regime Guidance (October 2001). Local market rents are calculated using the Royal Institution for Chartered Surveyors (RICS) approved valuation methods²⁵.

Age-Restricted General Market Housing

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

Annual Monitoring Report

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

Basic Conditions

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

Backlog need

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

Bedroom Standard²⁶

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

²⁵ The Tenant Services Authority has issued an explanatory note on these methods at <http://www.communities.gov.uk/documents/planningandbuilding/pdf/1918430.pdf>

²⁶ See <https://www.gov.uk/government/statistics/english-housing-survey-2011-to-2012-household-report>

Co-living

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

Community Led Housing/Community Land Trusts

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

Community Right to Build Order²⁷

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

Concealed Families (Census definition)²⁸

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

Equity Loans/Shared Equity

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

²⁷ See <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>

²⁸ See http://webarchive.nationalarchives.gov.uk/20160107160832/http://www.ons.gov.uk/ons/dcp171776_350282.pdf

Extra Care Housing or Housing-With-Care

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

Fair Share

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

First Homes

First Homes is another form of discounted market housing which will provide a discount of at least 30% on the price of new homes, introduced in 2021. These homes are available to first time buyers as a priority but other households will be eligible depending on agreed criteria. New developments will be required to provide 25% of Affordable Housing as First Homes. A more detailed explanation of First Homes and its implications is provided in the main body of the HNA.

Habitable Rooms

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

Household Reference Person (HRP)

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

Housing Market Area

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

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

Housing Needs

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

Housing Needs Assessment

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

Housing Products

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

Housing Size (Census Definition)

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

Housing Type (Census Definition)

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

Housing Tenure (Census Definition)

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

Income Threshold

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

Intercensal Period

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

Intermediate Housing

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

Life Stage modelling

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

Life-time Homes

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

Life-time Neighbourhoods

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

Local Development Order

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

Local Enterprise Partnership

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

Local housing need (NPPF definition)

The number of homes identified as being needed through the application of the standard method set out in national planning guidance (or, in the context of preparing strategic policies only, this may be calculated using a justified alternative approach as provided for in paragraph 60 of this Framework).

Local Planning Authority

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

Local Plan

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

Lower Quartile

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

Lower Quartile Affordability Ratio

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

Market Housing

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

Mean (Average)

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

Median

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

Median Affordability Ratio

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

Mortgage Ratio

The mortgage ratio is the ratio of mortgage value to income which is typically deemed acceptable by banks. Approximately 75% of all mortgage lending ratios fell below 4 in recent years²⁹, i.e. the total value of the mortgage was less than 4 times the annual income of the person who was granted the mortgage.

Neighbourhood Development Order (NDO)

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

Neighbourhood plan

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

Older People

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

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

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

Overcrowding

There is no single agreed definition of overcrowding, however, utilising the Government's bedroom standard, overcrowding is deemed to be in households where there is more than one person in the household per room (excluding kitchens,

²⁹ See <https://www.which.co.uk/news/2017/08/how-your-income-affects-your-mortgage-chances/>

bathrooms, halls and storage areas). As such, a home with one bedroom and one living room and one kitchen would be deemed overcrowded if three adults were living there.

Planning Condition

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

Planning Obligation

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

Purchase Threshold

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

Proportionate and Robust Evidence

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

Private Rented

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

Retirement Living or Sheltered Housing

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

Residential Care Homes and Nursing Homes

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

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

Rightsizing

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

Rural Exception Sites

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

Shared Ownership

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

Sheltered Housing³⁰

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

³⁰ See <http://www.housingcare.org/jargon-sheltered-housing.aspx>

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

Strategic Housing Land Availability Assessment

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

Strategic Housing Market Assessment (NPPF Definition)

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

Specialist Housing for the Elderly

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

Social Rented Housing

Social rented housing is owned by local authorities and private registered providers (as defined in Section 80 of the Housing and Regeneration Act 2008.). Guideline target rents for this tenure are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with Homes England.³¹

³¹ See <http://www.communities.gov.uk/documents/planningandbuilding/doc/1980960.doc#Housing>

