

RE:	AN ASSESSMENT OF THE POTENTIAL CONTRIBUTION OF THE PROPOSED URBAN EXTENSION AT ODD DOWN TO MEETING THE AFFORDABLE HOUSING NEEDS OF BATH AND NORTH EAST SOMERSET
ON BEHALF OF:	THE HIGNETT FAMILY TRUST/ THE GUINNESS TRUST
PREPARED BY:	TETLOW KING PLANNING UNIT 2, ECLIPSE OFFICE PARK, HIGH STREET, STAPLE HILL, BRISTOL BS16 5EL
TEL: FAX: EMAIL: WEBSITE:	0117 956 1916 0117 970 1293 all@tetlow-king.co.uk www.tetlow-king.co.uk
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Section 1

Introduction

- 1.1 This report has been commissioned by **The Hignett Family Settlement** and **The Guinness Trust**. It examines the affordable housing needs in Bath and North East Somerset (B&NES) and in particular in relation to the proposed urban extension to the south of Bath at Odd Down.
- 1.2 The report highlights the scale of affordable housing need in the district relative to the rest of the country, region and sub-region. As well as the scale of housing affordability problems in South Bath relative to the rest of the district.
- 1.3 A variety of different reports and research have been examined and analysed; as well as live data on those registered with the Council in its role as the Local Housing Authority as being in need of affordable housing in the district.
- 1.4 The report finds that the housing affordability problems in B&NES are acute in the national context; and that housing affordability is considerably worse in B&NES than the regional and sub-regional average. It concludes that the Council's policies as proposed in the Submitted Core Strategy are more likely to exacerbate than to ameliorate these conditions.
- 1.5 Our analysis of the sub-district data reveals that need is significantly higher in the city of Bath compared to the rest of the district, with a very high need in South Bath. It also finds the very significant need for older people's housing similarly concentrated
- 1.6 Section 2 sets out the Council's proposed policies on affordable housing and a review of the viability study underpinning them. Section 3 compares the housing affordability problems in B&NES to those at a national and regional level. Section 4 considers these issues within the district and Section 5 specifically analyses the affordable housing need in South Bath. Section 6 considers what impact the proposed South Bath urban extension could have on and Section 7 draws together our conclusions.

Section 2

B&NES Core Strategy – Proposed Policies on Affordable Housing

- 2.1 Draft Policy DW1 sets an overall housing target of 11,000 dwellings (550 dwellings per annum) for the district, with 6,000 in the city of Bath over the period 2006 to 2026. This overall target contrast with the initial draft Regional Spatial Strategy (RSS) target endorsed by the Council of 15,500 new dwellings and the 22,365 new dwellings endorsed by the Secretary of State in the Proposed Changes to the RSS. The Council's overall housing target remains considerably lower than the most up to date DCLG household projections.
- 2.2 Affordable housing is largely delivered as a proportion of open market housing. The quantum of the overall housing target strongly influences the quantum of affordable housing which can be delivered.
- 2.3 The Council acknowledges that there is a high need for affordable housing in the district and the Core strategy states that it will attempt to 'maximise' its delivery (paragraph 1.34). Draft policy DW1 states that of the 11,000 proposed dwellings 3,400 should be affordable (170 dwellings per annum). This equates to a proportion of about 30%.
- 2.4 According to the Annual Monitoring Report (2009/10), 1,664 dwellings have been delivered in the district since 2006. Against the draft Core Strategy target of 11,000, this leaves a residual requirement of 9,336 units. Taking into account these existing completions the annual housing requirement increases from 550 to 583.5 dwellings per annum for the remaining plan period. In terms of afforable housing, the Annual Monitoring Report notes the delivery of 383 affordable units in the district since 2006. Against the draft Core Strategy target, this leaves a residual requirement of 3,017 affordable homes, or 188.5 per annum.
- 2.5 The Core Strategy sets the following housing distribution across the district:

	Draft Core Strategy Total	Draft Core Strategy Annual
Bath	6000	300
Keynsham	1,500	75
Somer Valley	2,700	135
Rural Areas	800	40
B&NES Total	11,000	550

Fig 2.1 Source: B&NES AMR 2009/10

2.6 The progress of delivery against these housing targets since 2006 is set out below:

	Total Delivery	Residual requirement	Annualised residual requirement
Bath	790	5,210	325
Keynsham	175	1,325	83
Somer Valley	506	2,194	137
Rural Areas	193	607	38
B&NES Total	1,664	9,336	583.5

Fig 2.2 Source: B&NES AMR 2009/10

- 2.7 Thus in Bath itself, the annual dwelling requirement has increased from 300 to 325 dwellings per annum. The annual dwelling requirement of 325 dwellings is anticipated to deliver around 114 affordable units per annum in Bath.
- 2.8 To assess the delivery of affordable housing, a strategic viability study was undertaken in June 2010. This concluded that there are three options:
 - i. To maintain the current policy target of 35% affordable housing as set out in the Local Plan.
 - ii. Introduce a 2 way split: 40% for higher value areas of Prime Bath, Bath Rural Hinterland, Bath North and East and Chew Valley Higher; and a 30% target for lower value areas of Bath North and West, Bath South, Chew Valley Lower, Keynsham and Saltford and Norton Radstock, Paulton and Peasedown.
 - iii. Introduce 5 targets, split across 50% for Bath Rural Hinterland; 40% target for Prime Bath and Bath North and East; a 35% target for Chew Valley Higher, Bath North and West, Bath South and Chew Valley lower; a 30% target in Keynsham and Saltford and a 25% affordable housing target for Norton Radstock, Paulton and Peasedown.
- 2.9 The Council took these into account in composing draft policy CP9 which sets an on site affordable housing target of 35% on large sites and 45% on sites with above average market values. For smaller sites between 5 and 9 units there is a target of 17.5% on-site or an equivalent financial contribution. The proposed tenure split is 75% social rented and 25% intermediate. Draft policy CP9 is included in **Appendix A**.
- 2.10 This level of affordable housing provision was subsequently reexamined with a validation study produced in April 2011, which again supported the 35% affordable housing target.

- 2.11 The B&NES Future Housing Growth Requirements to 2026 Stage 2 Report concludes that the requirement for additional housing between 2006 and 2026 is 11,600 dwellings based on the projected rate of economic growth. It recommends that 35% of this total, equating to 4,060 dwellings or 203 per annum, should be used as the initial target for affordable housing completions. It considers that this is a practical and reasonable starting point taking into account around 430 relets per annum from the existing affordable housing stock.
- 2.12 It is noteworthy that in the initial Spatial Options version of the Core Strategy, the Council proposed to provide 15,500 additional homes, with a target of 228 affordable dwellings per year. The document included the following observation:

'If this level of housing is not provided then it will have serious implications, preventing some people having access to a decent home, making housing less affordable (to buy or rent) and in the longer term damaging the local economy by reducing labour supply and mobility.'

- 2.13 Taking into account the existing completions, the housing target against the draft Core Strategy remains at 583.5 dwellings per annum, with a specific target for Bath of 325 dwellings per annum. The target for affordable housing is 188.5 dwellings per annum for B&NES and 114 dwellings per annum for Bath City.
- 2.14 As set out in PPS3 and Planning for Growth, the Government remains committed to delivering affordable housing for people who are unable to access or afford market housing. This commitment must be translated through the B&NES Core Strategy in the light of local circumstances.

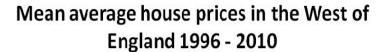
Section 3

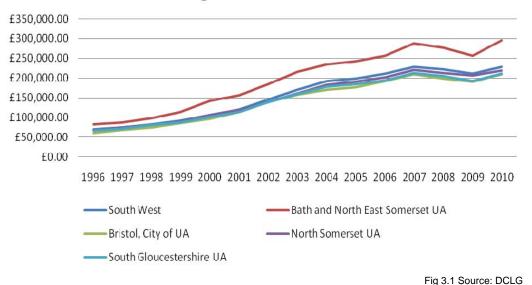
The Need for Affordable Housing in B&NES relative to Regional and National Picture

3.1 According to the Council's Local Economic Assessment (2010), house prices in B&NES are a third higher than the national average and significantly higher than the West of England average. Below sets out a range of indicators that demonstrate that the affordability problems in B&NES housing market are far more acute than the national and regional average.

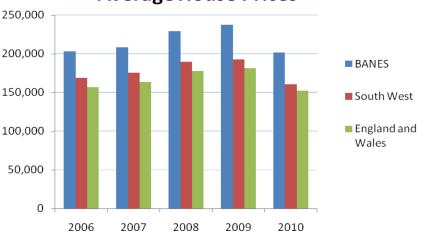
Mean Average House Prices

3.2 DCLG data on mean average house prices shows that in B&NES house prices are by some distance the highest in the West of England subregion, being very much higher than the South West regional average. It also shows that house prices have risen much quicker than other local authorities in the sub-region.





- 3.3 The latest house price data published by the Land Registry on 26th August 2011 shows that B&NES experienced the highest annual price change in July with an increase in 2.4%. The average house price in B&NES is now £229,687, which compares to the regional average of £174,946 and national average of £163,049.
- 3.4 The B&NES Annual Monitoring Report sets out the change in annual house prices in the district since 2006. This shows how B&NES has maintained consistently higher house prices than the national and regional averages and has hence remained relatively unaffordable. This situation is unlikely to change unless housing supply can be brought into a closer alignment with demand.



Average House Prices

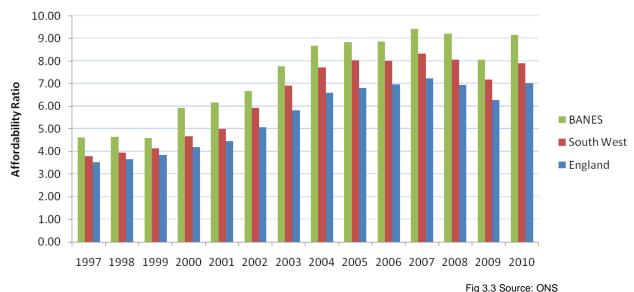
Median House Prices to Median Earnings

- 3.5 The ratio of median house prices to median earnings shows that in B&NES, house prices are on average over 9 times the median income. This is considerably higher than the average for the South West and for England.
- 3.6 The available data shows that not only is housing affordability in B&NES worse than the national and regional average, but that housing affordability is increasing in B&NES at a much faster rate than the average throughout England. In 1999 the national average ratio was 3.54 times income to buy an average property; in the South West this was 3.78 and in B&NES it stood at 4.62. The most up-to-date figures, based on January 2011 data, shows the housing affordability ratio average for England at 7.01, the South West figure at 7.92, and in B&NES the median ratio is 9.15. Thus, the housing affordability gap in B&NES (for the median house price to earnings ratio) has grown an

Fig 3.2 Source: B&NES AMR 2009/10

additional 25% above the national average between 1997 and 2010 and significantly quicker than the regional average (see Figure 3.3).

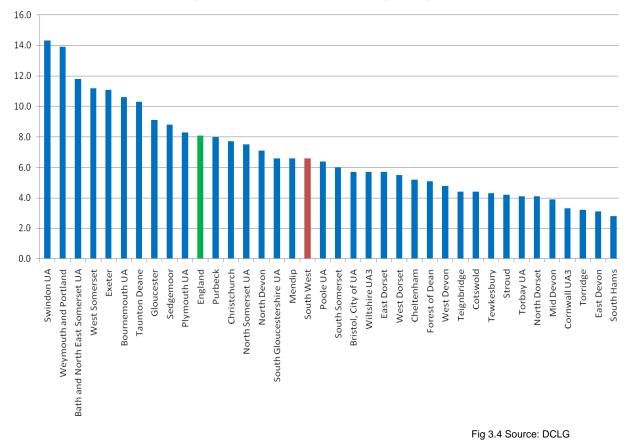
3.7 During the credit crunch and the fall in house prices in 2008 and 2009 the median affordability ratio recovered, but by 2010 had nearly returned to 2007 levels. It is expected that with house prices increasing at a faster rate than wages that 2011 will show median housing affordability ratio returning to 2007 levels.



Ratio of median house prices to median earnings, based on data from Jan 2011

Percentage of All Households on the Waiting List

- 3.8 The need for affordable housing in B&NES is further highlighted by the proportion of all households on the housing waiting list. In B&NES nearly 12% of all households are registered by the Council as the local Housing Authority as being in need of affordable housing. This equates to almost 1 in every 8 households in B&NES being on the housing waiting list. This represents the third highest proportion in the South West; with only the local authorities of Swindon and Weymouth and Portland having higher percentages.
- 3.9 The B&NES figure is nearly double the regional average for the South West of 6.5% and well above the national average of 8%.
- 3.10 Within B&NES the affordable housing need is highly skewed towards the City of Bath. Of those households on the waiting list identifying an area of preference, 53% have expressed a need to be within Bath City. This is further explored in Section 5.



Percentage of all households on the housing waiting list (2010)

Percentage of Affordable Housing Need Being Met

- 3.11 The Shelter Local Housing Watch statistics show that B&NES Council provided only 13% of the affordable housing needed. This was based on the Strategic Housing Market Assessment (SHMA) data against the annual average of affordable housing provided over three years. B&NES was ranked 213th out of 323 councils surveyed in England, with rank number 1 being the council that met the highest percentage of affordable housing need and and number 323 the least. B&NES was ranked in the bottom third of councils at providing affordable homes to meet need.
- 3.12 The Shelter data notes that at the current rate of delivery it would take over 16 years to clear the existing housing waiting list, but only if no additional households were added to the list in the interim.
- 3.13 This data all demonstrates the high level of affordable housing need in the district in relation to a range of regional and national averages. Furthermore the rate of growth of affordable housing need has been much faster in B&NES in comparison to the South West and England averages.

Section 4

Affordable Housing Need in Bath and North East Somerset

4.1 There is an acute need for affordable housing in B&NES. By the Council's own admission 'the need for affordable housing in the district is high'. We consider that the target of 3,400 affordable dwellings over the plan period is insufficient and this demonstrated by a series of key indicators of affordable housing need.

Strategic Housing Market Assessment (SHMA) (2009)

4.2 The SHMA calculates that the total average newly arising need for affordable homes in B&NES over the period 2009 to 2021 is **847 dwellings per annum**, with a tenure split of 93% social rented and 7% intermediate. This identified need is over and above the estimated annual 432 relets which is shown in the table below:

	Annual Need	Annual Supply of Relets	Total Net Annual Need
Social Rented	1213	426	786
Intermediate	67	6	61
Total	1280	432	847

N.B Figures may not sum due to rounding

Fig 4.1 Source: SHMA

- 4.3 Assessing this need against supply, the SHMA estimates that the percentage of housing which would have to be affordable to meet housing need is 116%, the highest in the West of England area (Table 4.11). However, this is calculated using the overall housing target of 14,640 as identified in the Spatial Options Core Strategy report.
- 4.4 A revised calculation based on the proposed housing target of 11,000 in the Submission Core Strategy means that 154% of new housing would have to be affordable to meet this identified need. Notwithstanding the affordable housing targets set by each authority, this is the greatest underprovision proposed by any of the West of England authorities. A table identifying this is included in **Appendix B**.
- 4.5 When comparing the current levels of housing provision with the identified levels of need within the SHMA, BANES has the second

highest shortfall of proposed affordable housing provision, with affordable housing need five times the proposed supply. Further details are again included in **Appendix B**.

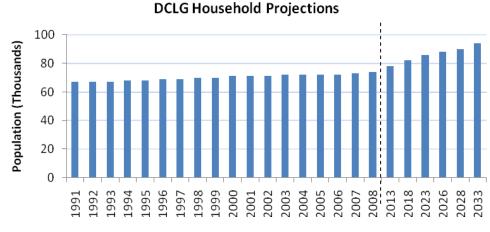
4.6 The SHMA focuses on the need for affordable housing rather than general housing market demand. Taking the average rate of affordable housing delivery as 35%, as supported by the recent viability studies, to meet the identified need of 847 units per annum would require a general housing target of 2,420 dwellings per annum. This further demonstrates the scale of the housing needs and that the current planned provision of housing within the Core Strategy is completely inadequate to meet projected need.

West of England Housing Need and Affordability Assessment (May 2005)

- 4.7 This assessment acknowledges that even in 2004, the projected need for affordable housing exceed the total projected new dwellings in B&NES.
- 4.8 It calculates a net annual need of 664 units of affordable housing in the district. Breaking this down across the district it identifies a need for 268 units (or 40%) in Bath City, 97 units (or 15%) in Keynsham, 180 units (or 27%) in Midsomer-Norton and Radstock and 120 units (or 18%) in rural North East Somerset. This highlights that the highest proportion of need is within Bath City.
- 4.9 Applying these proportions to the annual need identified in the SHMA of 847 units, this updates the annual average need to around 339 units in Bath City, 127 units in Keynsham, 229 units in Midsomer-Norton and Radstock, and 152 units in rural North East Somerset.

DCLG Household projections

4.10 The 2010 DCLG projections suggest an increase of around 16,000 households between 2006 and 2026. This is set out in the graph below, showing an increase from 72,000 in 2006 to 88,000 in 2026. This is far higher than the additional 11,000 households planned for in the submitted Core Strategy.



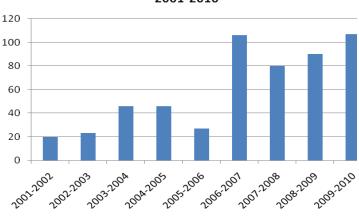
Existing and Projected Population for BANES based on 2010

Fig 4.2 Source: DCLG

4.11 The DCLG projections contain data on the growth of older person households. The 2010 data on age structure covers the period 2008 – 2033, this is a slightly different but still relevant period to the Core Strategy plan period. It shows that approximately 55% of all household growth will come from households aged 65 or above. Around 25% of this growth comes from the 85 or above age group. This is the age group is the most vulnerable and typically has the highest level of care needs. Thus, a high proportion of the housing provision will need to be for the older population with appropriate allowance for associated care needs particularly in the 85 or above age group.

Annual Monitoring Report 2009 - 2010

4.12 The Council's Annual Monitoring Report provides information on gross affordable housing completions over the previous nine years. This shows a recent increase in delivery from extremely low levels, to 107 affordable dwellings delivered last year.



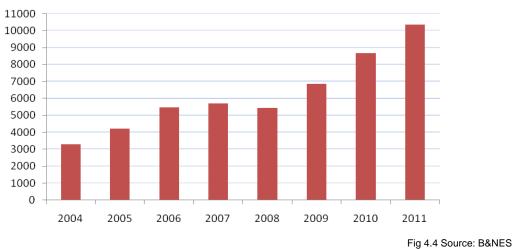
Number of Affordable Homes delivered in BANES 2001-2010

Fig 4.3 Source: B&NES Annual Monitoring Report 2009-2010

- 4.13 These totals represent the change in stock resulting from new builds, conversions, acquisitions and demolition. The totals do not take account of loss through the right to buy, so in reality the net addition to the affordable housing stock will be lower than the Council has recorded.
- 4.14 This provision of affordable housing is considerably low when compared to the average annual need of 847 units per annum. The delivery of 107 units last year met approximately 12% of the identified need.

Housing Register

4.15 The graph below shows the increase in the number of applicants on the housing waiting list.



Number of households on the housing register at 1st April

- 4.17 Since 2005 the numbers on the waiting lists have more than doubled. The waiting list has been increasing faster over the period 2008 – 2010 with approximately 1,650 additional households per annum, compared to around 433 additional households over the 2005 – 2008 period.
- 4.18 The Homesearch Newsletter produced by the Council provides some basic up-to-date data on the housing waiting list. The June 2011 edition states that the number of people on the housing register is increasing by an average of 60 per week. During the last 3 months 150 people have been housed, compared to 816 applicants being added to the register in the same period. This represents an average availability of around 12 houses per week.

^{4.16} This clearly emphasises that the number of households on the housing register has rapidly increased since 2004. The figure now stands at 11,051 households according to the most up-to-date HomeSearch figures.

- 4.19 This data clearly demonstrates a rapidly increasing backlog of demand for affordable housing. Between April and June 2011, for every 1 household housed another 5.44 were added to the register.
- 4.20 Using the waiting list data for 1st April 2011 the following graph shows the distribution of need throughout the district across the different size of units. The greatest need is apparently for 1 bed units.

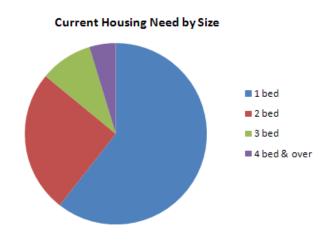


Fig 4.5 Source: B&NES Housing Register Data

4.21 To be considered eligible for the housing register applicants must be aged 16 years or over. Applicants must qualify for one of the following groups in order to be placed on the register:

Group A: Applicants who seek affordable accommodation as a result of statutory requirements or those who are at serious risk to their health, safety and well-being. Or applicants with an agreed combination need to move and who have an agreed need to live in the area.

Group B: Applicants who have a medium level need for accommodation. And who have an agreed need to move to the area.

Group C: People who have an agreed need to live in the area.

Group D: People who do not meet the criteria in Groups A, B or C

4.22 All applications will be assessed by the Homesearch team to ensure they meet the criteria of one of the groups above. Applications can be made by people who do not currently live in the district as long as it can be demonstrated that they have a specific need to be within B&NES. Further details of the specific criteria of groups are included in **Appendix C**. These include criteria such as being statutorily homeless

or living in overcrowded or dangerous housing conditions, or where applicants have an urgent medical or social need.

- 4.23 50% of the available properties are directed towards those in group A. Only hard to let properties with no interest from applicants in groups A, B or C will be offered to those in group D.
- 4.24 There are further eligibility criteria relating to the size and type of accommodation available. These are set out below:

Household Circumstances	Studio	1 bed	2 bed	3 bed	4 bed
Single Person	✓	✓			
Couple		\checkmark			
Parent/couple with 1 child or pregnant			\checkmark		
Parent/couple with 1 child under 8 and			\checkmark		
pregnant					
Parent/couple with 2 children (eldest			\checkmark		
under 8 years)					
Parent/couple with 2 children same sex			\checkmark	✓	
(eldest 8 years or over)					
Parent/couple with 2 children of different				✓	
sex (eldest 8 years or over)					
Parent/couple with 2 children and				✓	
pregnant with 3 rd child					
Parent/couple with 3 or more children				✓	✓

Fig 4.6 Source: B&NES Homesearch Policy

- 4.25 The Homesearch policy acknowledges a shortage of larger accommodation and that applicants for 4 bed properties may be considered for larger 3 bedroom accommodation.
- 4.26 Failing to meet this identified housing need can have significant social and economic consequences. It is likely to result in an increase in homelessness and have a negative impact on the health, safety and well-being of households. This is likely to increase social divisions and have a negative effect on job stability for many of these households. As acknowledged by the Council in the Spatial Options version of the Core Strategy, there could be longer term damage to the local economy on labour supply and mobility. In particular, many key workers may be priced out of the city, affecting its economic growth and prosperity.
- 4.27 Increasing housing targets within the Core Strategy to correspond more closely with the DCLG household projections would provide a better balance between housing supply and demand. Not only are increased housing numbers likely to provide a higher quantum and proportion of affordable housing but increased housing supply is also likely to

stabilise house prices, potentially reducing the growth of affordable housing need in the future.

Older People

4.28 Older Persons housing is a growing component of the overall housing need. The graph below shows how the number of older people on the housing waiting list has grown by over 300 in the last four years from 774 in 2008 to 1107 in 2011.

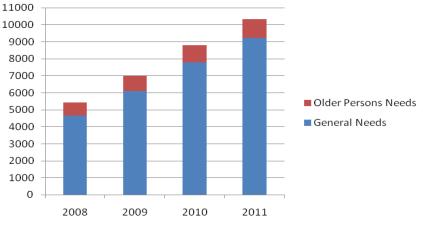


Fig 4.7 Source: B&NES Housing Register Data

- 4.29 The SHMA acknowledges that the South West has the highest number of people over 65 and the longest life expectancy of any English Region. Both the proportion and number of the oldest old (85 and over) are set to increase. The SHMA acknowledges the need for further good quality extra care housing in B&NES.
- 4.30 The table below shows the breakdown of the projected population aged 65 and over. It predicts that by 2030 there will be 43,500 people over 65 in B&NES. This is an increase of 12,000 between 2010 and 2030. The Council needs to ensure that sufficient provision is made for this growing older population.

	2010	2015	2020	2025	2030
People aged 65-69	8,400	9,900	8,800	9,400	10,700
People aged 70-74	7,100	7,800	9,300	8,300	8,900
People aged 75-79	6,100	6,400	7,100	8,500	7,700
People aged 80-84	5,000	5,100	5,500	6,200	7,500
People aged 85-89	3,400	3,500	3,800	4,300	5,000
People aged 90 and over	1,500	2,000	2,500	3,000	3,700
Total population 65 and	31,500	34,700	37,000	39,700	43,500
over	31,300	34,700	57,000	39,700	43,300

Fig 4.8 Source: POPPI 2010

Conclusions

- 4.31 The submission Core Strategy sets out an affordable housing requirement of around 170 units per annum. Taking into account the low levels of delivery since 2006 this increases to 188.5 affordable dwellings per annum. This is below the 228 a year which was recommended as deliverable by the requirements study and well below the 847 new affordable homes per year acknowledged in the SHMA.
- 4.32 The provision of affordable housing in B&NES has been relatively low, with the numbers on the waiting list continuing to increase. The HSSA data shows that at 1st April 2010 this was at 8,800 dwellings but has increased in the last year to around 11,051. The fact that in the last 3 months (April June 2011) there have only been 150 households housed and yet 816 have been added to the register in that time further demonstrates the high, and growing, level of need. Unless the delivery of affordable housing increases, the level of need is only going to further increase.

Section 5

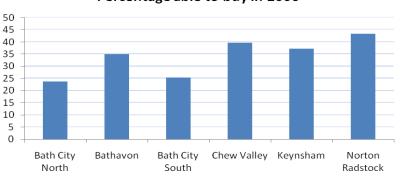
Affordable Housing Need in South Bath

5.1 The SHMA breaks B&NES down into 6 areas and analyses the affordable housing need across these. These are shown in Figure 5.1 below.



Fig 5.1 Source: Areas based on the SHMA

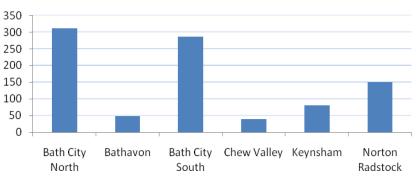
5.2 Data within the SHMA shows a very high need for affordable housing in the city of Bath in comparison to the rest of the district. As the graph below demonstrates the percentage of people able to purchase a property is considerably lower in Bath, with only 1 in 4 able to buy their own home in south Bath.



Percentage able to buy in 2006

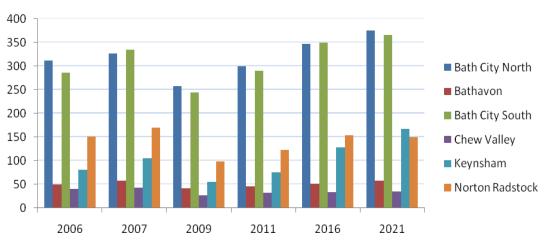
Fig 5.2 Source: SHMA data

5.3 The SHMA identifies the net affordable housing need across these 6 areas. The graph below demonstrates that the need for additional affordable housing is clearly higher in Bath City than elsewhere within the district. This identifies an average annual need for around 600 units within the City of Bath. Against the projected supply of 114 affordable units in Bath, this will leave an annual shortfall of 486 units.



Net Need for Additional Affordable Housing

5.4 As shown in the graph below this distribution of affordable housing need is predicted to remain. Thus, there is a particular need to focus the delivery of affordable housing in Bath City.



Net affordable need over time

- 5.5 These projections provide an annual average requirement for 312 units of affordable housing in Bath City South alone.
- 5.6 Social rented housing predominates affordable housing delivery. The SHMA highlights that a higher priority could be given to intermediate affordable housing. The Figure below predicts the need for intermediate

Fig 5.3 Source: SHMA data

Fig 5.4 Source: SHMA data

affordable units across the district. It is clear that Bath City South and Norton/Radstock have the highest current and future levels of need for intermedaite affordable housing.

	2006	2007	2009	2011	2016	2021
Bath City North	19	0	0	10	2	0
Bathavon	0	0	0	0	0	0
Bath City South	38	3	16	37	34	29
Chew Valley	0	0	0	0	0	0
Keynsham	3	0	0	0	0	0
Norton/Radstock	37	23	11	33	33	29

Fig 5.5 Source: SHMA

- 5.7 The SHMA acknowledges widespread concern that recent patterns of housing provision have not paid sufficient attention to the needs of families with children, with the majority of recent development consisting of smaller high density flatted properties.
- 5.8 The map below shows the percentage need for additional family and non family social rented properties in the City of Bath. In the north of the City it clearly shows that the greatest need is for non family accommodation, such as 1 and 2 bedroom flats. In comparison, 76% of need in South Bath is for family accommodation. Due to the larger land requirements for family housing in comparison to flatted development, it is unlikely that this additional need could be wholly accommodated within the existing urban area.

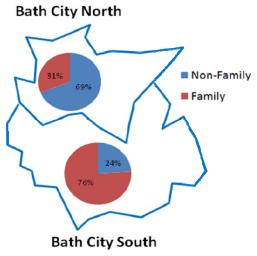


Fig 5.6 Source: data from the SHMA

5.9 A detailed breakdown of the area preferences for general needs housing on the housing register are included in **Appendix D**. This shows that around 67% of applicants have identified an area of housing preference, with 33% stating no preference. On 17th August 2011 the

number of applicants for general needs housing with a preference to be located in Bath City was 3,476. This is in comparison to 1001 in Norton Radstock and 873 in Keynsham. Thus of the 67% who identified an area of preference, 53% of this need is within the City of Bath. The proportional distribution of applicants on the waiting list is show below:



NBThis map is schematic only.

Fig 5.7 Source: B&NES Housing Register Data

- 5.10 There is an additional need for 3284 units where a location preference has not been identified.
- 5.11 The number of applicants on the housing waiting list for older persons accommodation is 288 in the City of Bath, with 136 in Keynsham, 57 in Midsomer Norton/Radstock and 134 in the rural areas. There are a further 556 applicants who have not identified an area of preference. This need is predicted to increase with the projected growth in the older population. Further details are included in **Appendix E**.
- 5.12 The proposed site to the South of the City directly adjoins the wards of Odd Down and Lyncombe, however details for the adjacent ward of Combe Down are also included. These wards are shown below and in more detail in **Appendix F**.

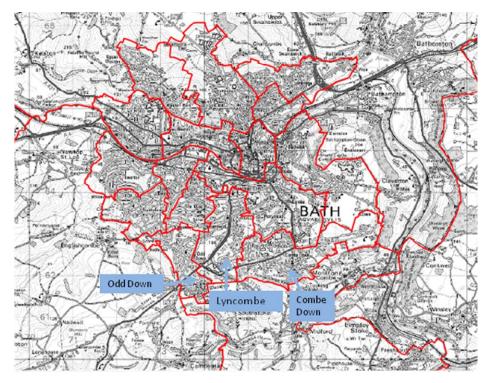


Fig 5.8 Source: Base map from B&NES

5.13 The Residential Review conducted by the Council in December 2007 details different attributes to help profile the wards. Some of these are shown in the table below.

Ward	All households	Owned	Owned outright	Owned with mortgage or Ioan	Shared ownership	Social rented	Private rented	Living rent free
Combe Down	2342	1494	829	661	4	536	770	63
Lyncombe	2074	1708	849	856	3	148	187	31
Odd Down	2181	1562	684	835	43	383	175	61

Fig 5.9 Source: B&NES Residential Review (December 2007)

5.14 In total there are 6597 households in the wards to the south of Bath, of which 1067 or 16% are social rented and 66 or 1% are shared ownership. Odd Down has 18% social rented properties, Lyncombe has 7% and Combe Down has 23% social rented properties. Lyncombe has one of the highest proportions of owner occupied units in the City of Bath.

Conclusions

5.15 Overall within B&NES it is clear that the majority of affordable housing need is concentrated within the City of Bath. The SHMA identifies an annual need of around 600 affordable dwellings within the City. In addition, over 50% of the current applicants on the housing waiting list who have identified a preference area have chosen somewhere within the City. Based on the target of 11,000 dwellings in the Core Strategy, there is an average annual requirement to deliver 114 affordable dwellings in Bath. This will create an average shortfall of 486 units. Unless this situation is addressed, the need for affordable housing will continue to increase.

Section 6

Implications of a Sustainable New Community at South Bath

- 6.1 The proposed new community at South Bath can provide much needed affordable housing in a locality where there is an identified high level of need.
- 6.2 At present the Core Strategy proposes the delivery of 11,000 new homes in B&NES throughout the plan period, providing around 3,400 new affordable dwellings. This creates an average provision of 170 affordable dwellings throughout the plan period. When compared to the identified need in the Strategic Housing Market Assessment of 847 units per annum, which is over and above existing relets, this creates an annual undersupply of around 677 units of affordable housing. Therefore based on the present Core Strategy there will be a total undersupply of 13,540 affordable housing units throughout the plan period.
- 6.3 The greatest proportion of the need identified is located within Bath itself. For South Bath the SHMA calculates an average additional need of 312 affordable units per annum, which far exceeds the Council's proposed annual supply of 114 units for the whole city. There is a great danger that the current Core Strategy will significantly exacerbate the affordable housing needs of the district.
- 6.4 There are currently around 11,051 applicants on the housing register, which as more than doubled since 2005; and includes 1171 applicants in need of older person's accommodation. This represents a huge increase in the need for affordable housing over recent years, which the Council has failed to begin to address. In particular, there are currently 3,476 applicants with a preference to live in the City of Bath.
- 6.5 The proposed new neighbourhood at Odd Down is an opportunity to provide a sustainable mixed community which could make a significant contribution towards meeting the demonstrable affordable housing need.
- 6.6 We understand that the Hignett Family Trust proposes a development of up to 1500 new homes at Odd Down. This could potentially generate

up to about 500 affordable homes to meet the demonstrable needs of Bath; and could also include the provision of specialist housing to meet the particular needs of older or disabled residents.

- 6.7 This additional provision of around 500 affordable units would increase the overall affordable housing provision to 3,900 dwellings over the plan period, or 195 dwellings per annum. This would be much closer to the Council's initial annual target of 228 affordable dwellings, relative to which the Council itself has recognised that "serious implications" would arise if it failed to be met.
- 6.8 Government policy requires local authorities to plan to meet their local housing needs, ensuring that everyone has the opportunity to live in a decent home in an area that they want to live in. The submitted Core Strategy fails in this regard. In the absence of any planned urban extensions, the Council seeks to meet this housing need through the regeneration within the existing urban areas. An over-reliance on urban sites in this way is likely to lead to developments of smaller flatted accommodation. A high proportion of the affordable housing need in Bath is for larger family housing. The proposed urban extension could considerably help to meet this need, with the capacity to provide a full mix and range of accommodation including larger family housing.
- 6.9 The affordable housing targets currently proposed by the Council pay inadequate regard to the substantial evidence; and are inconsistent with national policy. There is a fast and growing need for affordable housing within B&NES and particularly within the City of Bath. The provision of a sustainable urban extension at Odd Down could make a significant contribution to meeting the identified current and future affordable housing needs.

Section 7

Conclusions

- 7.1 The need for affordable housing in B&NES is acute. House prices are a third higher than the national average and much higher than the regional average. Housing affordability is also worse than the national and regional averages with median house prices over 9 times the median income.
- 7.2 Nearly 12% of all households are in need of affordable housing. At present there are around 11,051 applicants on the housing register, yet over the last year only an additional 107 affordable units have been delivered in the district. As the need for affordable housing has increased over recent years, the supply has not increased as the same rate, further widening the gap between supply and demand. At present, as every one household is re-housed, a further 5 are added to the register. The current delivery is therefore far from sufficient to meet this growing need.
- 7.3 The draft Core Strategy proposes the delivery of a total of 11,000 additional homes in the district between 2006 and 2026, including 3,400 affordable homes. This equates to a target supply of 170 dwellings per annum. Taking into account the current delivery of affordable units, this target has increased to 188.5 dwellings per annum.
- 7.4 The SHMA identifies a requirement for an additional total of 847 affordable dwellings per annum. The current target of 188.5 dwellings per annum is therefore hugely insufficient when viewed against the scale of the need in the district.
- 7.5 The majority of this need is concentrated within the city of Bath. At present there are 3,476 applicants on the housing register with a preference to live in Bath City. Given the proposed supply of 114 affordable units per year and the projected future need of 600 units per year in Bath, it is highly unlikely this need will be met. The provision of a sustainable urban extension could provide a significant contribution towards meeting this need. In particular it could provide the types of family housing to meet the need identified.
- 7.6 In conclusion, the housing targets proposed by the Council apparently disregard the evidence available and is therefore not consistent with

national policy. Given the huge need identified and the rate at which it is increasing, it is imperative that the housing targets within the Core Strategy are increased to address this need.

APPENDIX A

DRAFT POLICY CP9 FROM B&NES CORE STRATEGY

Policy CP9 Affordable housing

Large sites

Affordable housing will be required as on-site provision in developments of 10 dwellings or 0.5 hectare (whichever is the lower) and above. An average affordable housing percentage of 35% will be sought on these large development sites. This is on a grant free basis with the presumption that on site provision is expected.

Higher affordable housing proportions (up to a maximum of 45%) may be sought in individual cases, taking account of:

- a whether the site benefits from above average market values for the district;
- b whether grant or other public investment may be available to help achieve additional affordable housing.

In some cases the scheme viability may justify the Council accepting a grant free provision of affordable housing below the average of 35%. This may be applicable on schemes where market values are significantly below the district average or where the build costs are exceptionally high and taking into account whether grant or other public investment may be available.

Small sites

Residential developments on small sites from 5 to 9 dwellings or from 0.25 up to 0.49 hectare (whichever is the lower) should provide either on site provision or an appropriate financial contribution towards the provision of affordable housing with commuted sum calculations. The target level of affordable housing for these small sites will be 17.5%, half that of large sites, in order to encourage delivery. In terms of the 17.5% affordable housing on small sites, the Council will first consider if on site provision is appropriate. In many instances, particularly in the urban areas of Bath, Keynsham, Midsomer Norton and Radstock the Council will accept a commuted sum in lieu of on site provision. This should be agreed with housing and planning officers at an early stage.

Sub-division and phasing

Where it is proposed to phase development or sub-divide sites, or where only part of a site is subject to a planning application, the Council will take account of the whole of the site when determining whether it falls above or below the thresholds set out above.

Tenure

The tenure of the affordable housing will typically be based on a 75/25 split between social rent and intermediate housing.

Property Size and Mix

Residential developments delivering on-site affordable housing should provide a mix of affordable housing units and contribute to the creation of mixed, balanced and inclusive communities. The size and type of affordable units will be determined by the Council to reflect the identified housing needs and site suitability.

The type and size profile of the affordable housing will be guided by the Strategic Housing Market Assessment and other local housing requirements but the Council will aim for at least 60% of the affordable housing to be family houses including some large 4/5 bed dwellings.

Other

All affordable housing units delivered through this policy should remain at an affordable price for future eligible households. Affordable Housing should be integrated within a development and should not be distinguishable from market housing.

Delivery

Affordable housing will be delivered in accordance with the Council's Housing Strategy or equivalent.

The quantity, tenure balance and type/size mix of the affordable housing will be agreed with the Council's Affordable Housing Development Team, or equivalent, through the development management process. Applicants are recommended to hold early conversations with the Affordable Housing Development Team in order to agree the affordable housing provision and in particular the likely availability of public subsidy.

In exceptional circumstances, where the applicant has demonstrated a scheme is not viable and this has been independently validated, the Council may consider the use of alternative mechanisms to achieve the full affordable housing requirement.

Financial contributions towards affordable housing secured from development will be used to meet the housing objectives set out in the Housing Strategy, Any such contribution will contribute to a fund to assist in the delivery of additional affordable housing by supporting a scheme that would otherwise not be viable, increasing the amount of affordable housing in a scheme beyond the grant free position (up to a maximum of 45%), increasing the proportion of larger family units. assisting in the funding of older persons or supported housing or to improve the quality of the affordable housing product on offer.

С

APPENDIX B

SHMA DATA ON AFFORDABLE HOUSING NEED

The table below shows the affordable housing need as a share of new supply using more up to date housing targets announced since the SHMA study was carried out. The original figures are shown in brackets. This clearly indicates that the reduction in proposed housing supply will only further increase the need for affordable housing; with the level of need remaining the highest in B&NES.

Local Authority	Annual average supply of new build 2006-2026		Annual average need 2009-2021	as a s	lable need hare v supply
B&NES	550	(732)	847	154	(116)
Bristol	1,322	(1,501)	1,526	115	(102)
North Somerset	670	(1,401)	904	134	(64)
South Gloucestershire	1,112		1,401	64	
Mendip	450	(494)	324	72	(78)
West Wilts	488	(494)	386	79	(78)
West of England	4,771	(5,596)	4,893	103	(87)

Source: SHMA updated with Local Authority information

The table below compares the current levels of housing provision in the latest Core Strategy documents with the identified levels of need within the SHMA. It shows that B&NES has the second biggest shortfall in the sub-region, larger than Bristol, with affordable housing need, five times the proposed supply. The numbers in brackets represent the original numbers in the SHMA.

Current levels of provision compared with future levels of need

	Average annual affordable housing output on current policy (2006 – 2026)		Annual average need 2009-2021	Average Annual Shortfall	Annual under provision ratio (proposed need to supply)
B&NES	170	(228)	847	677 (619)	4.98
BCC	333	(367)	1,526	1,193(1,159)	4.58
North Somerset	150	(331)	904	754 (573)	6.02
South Gloucestershire	302		903	601	2.99
Mendip	125	(37)	324	199 (287)	2.59
West Wilts	111*	•	386	275	3.47
West of England	1,191	(1,376)	4,893	3,699(3,517)	4.11

*unable to disaggregate new affordable housing target for West Wiltshire from new Wiltshire Core Strategy, however overall target changes for West Wiltshire are small.

APPENDIX C

B&NES HOMESEARCH POLICY

Homesearch @ Bath and North East Somerset

Revised Policy November 2008

Homesearch Adult Social Services and Housing Bath and North East Somerset Council PO Box 3343 Bath BA1 2ZH

Printed on recycled paper Making Bath & North East Somerset an even better place to live, work and visit

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1. INTRODUCTION

The Council's Housing Register is called Homesearch and is based upon the principles of choice based lettings. That means we aim to give applicants choice wherever possible, while prioritising applicants on their housing need.

Homesearch is committed to giving choice to people who need housing by providing an open and accessible lettings service for affordable housing in Bath & North East Somerset. We aim to:

- i) provide a simple, clear and fair way to access affordable housing within Bath & North East Somerset.
- ii) give sufficient information to promote informed choices about your housing options.
- iii) help to build sustainable communities by looking at the needs of communities as well as the needs of individuals and by making better use of the existing housing stock.
- iv) ensure that vulnerable people are fully supported through the process, so that they are not excluded.

Anyone wanting to be considered for affordable housing in Bath and North East Somerset must complete an application form. The quickest and most effective way of doing this is by visiting <u>www.homesearchbathnes.org.uk</u> and completing the application form online. Alternatively a paper copy of the application form is available from the Homesearch Team (telephone 01225 396118).

2 THE HOMESEARCH PARTNERSHIP

Homesearch is a partnership between the Council and the Registered Social Landlords (RSLs) working in the Bath & North East Somerset area. Applying to the Homesearch partnership means that applicants will be considered for housing by any of the following Registered Social Landlords:

Anchor Housing Association English Churches Housing Group Ltd English Rural Housing Association German Lutheran Housing Association Hastoe Housing Knightstone Housing Association Methodist Homes Housing Association Ltd Places For People Redland Housing Association Sanctuary Housing Association SHAPE Housing Association Somer Community Housing Trust Sovereign Housing Association The Guinness Trust United Housing Association Western Challenge Housing Association

Information which is provided in an application may be shared with Registered Social Landlords in the Homesearch partnership.

3 ELIGIBILITY CRITERIA FOR JOINING HOMESEARCH

- Anyone aged 16 years or over can apply to join the Homesearch scheme even if they do not currently live in the Bath and North East Somerset area. However, people under the age of 18 will need a Guarantor before being offered accommodation.
- Joint applications can be made by opposite-sex couples or same-sex couples, or by brothers and sisters who want to live together. Joint applications will not be accepted from friends who want to live together or where government rules mean that one of the people has no right to social housing in the United Kingdom. Parents and adult children can make an application together but they will not be considered for a joint tenancy.
- Eligibility for accommodation size according to household size is shown Appendix 1.
- If you currently hold, or have previously held, a tenancy with a Council or Registered Social Landlord you can still apply to Homesearch.
- Applicants from abroad may be considered for housing providing there is proof of exceptional or indefinite leave to remain in the UK or granted refugee status or are habitual residency in the UK, Channel Islands, Isle of Man or Republic of Ireland.
- Applicants subject to immigration control may not join the Homesearch register. This includes asylum seekers, people with restrictions or conditions on their leave to enter or remain in the UK, people who have entered the UK illegally or who have outstayed their leave and people who are not habitually resident in the UK, Channel Islands, Isle of Man or Republic of Ireland.
- •

4 THE GROUPING SYSTEM

When we receive a completed Homesearch application form we will assess it and place the application in either Group A, B, C or D.

A summary of the Groups is shown below and full details are in Appendix 3.

• Group A

This Group includes people who need affordable housing as a result of a specific statutory requirement or those who are at a serious risk to their health, safety and well-being due to their housing situation and have an agreed need to live in the Bath and North East Somerset area. This will need to be verified. Applicants in this Group will have their priority reviewed on a regular basis

• Group B

This Group includes people who have a medium level need for housing. It includes people whose current housing situation is causing a risk to their health, safety and well-being and have an agreed need to live in the Bath and North East Somerset area. This will need to be verified. Applicants in this Group will have their priority reviewed on a regular basis

It also includes people who are eligible for the Assisted Move-on Scheme, a strategic management move or are at imminent risk of becoming homeless where the authority would owe them a statutory duty

• Group C

This Group includes people who want affordable housing and have an agreed need to live in the Bath & North East Somerset area.

• Group D

This Group includes people who do not meet the criteria for inclusion in Groups A, B or C and students who have moved to the area to study at one of the colleges in Bath and North East Somerset.

Advertising of vacant properties will be carried out to achieve the allocation shown in Appendix 4. The Homesearch Team Leader will monitor the number and type of properties being offered to each Group to ensure that the yearly quotas are being met. However, we may need to change the proportion in response to need. This may only be done by the Executive Member for Housing.

5 EFFECTIVE APPLICATION DATE

The day when the Homesearch Team receives your completed form will be the effective application date. However, if your application moves from one Group into a higher Group your effective application date will change to the date you changed Groups. This is so that people in the higher Groups have an effective date that is relevant to their situation and grouping at that time. If you move down a Group your original effective application date will be used. The effective date of applicants serving a prison sentence will be adjusted so that time on the register is not accrued while the applicant is in prison.

We will write to you when your application has been assessed. We will tell you which Group your application has been placed in and your effective application date. We will also give you information about ways to register your interest in properties.

You must tell us about any changes in your circumstances so that we can update your housing application. We will write to you if these changes mean that your Group and effective application date have changed.

6 ADVERTISING OF AVAILABLE PROPERTIES

Vacant properties will be advertised weekly and will be placed on the Homesearch website, in selected local newspapers and on an advert sheet which will be available in some Council and Registered Social Landlord Reception Areas. The adverts will give as much information as possible and include photographs where we have them.

7 REGISTERING AN INTEREST

How to Register an interest (bid)

If you see a property you would like advertised **and** it is the right size for your household **and** you are in the correct Group you can bid for the property. You can do this by:-

- Phoning the automated telephone line on 0845 270 1239
- Visiting <u>www.homesearchbathnes.org.uk</u> Free internet access available at some libraries throughout Bath and North East Somerset
- SMS Text on 07781484692. When sending a text please use this format: Homesearch Ref (space) Date of birth (space) Property Ref E.g. 00000 (space) 14011976 (space) 643
- Visiting our receptions in Lewis House, Manvers Street, Bath, Council Connect at The Hollies, Midsomer Norton or Council Connect at Riverside, Temple Street, Keynsham

You can only bid for 3 properties during any weekly advertising cycle

For more information about ways to register your interest you can visit our website or telephone one of our Homesearch Marketing Officers on 01225 396118.

If the information you give on your application form indicates that you need help to register an interest in properties then, if you would like us to, we will arrange for a member of the Homesearch team to help you. Or you can nominate a helper to bid on your behalf. This helper can be a friend, relative or support or agency worker.

8 ASSESSMENT OF REGISTRATIONS OF INTEREST

When the advertising cycle for a property has closed we will look at all the interest received and produce a shortlist. This shortlist will be in order of time on list for everyone in the correct Group. If there is more than one person at the top of the

shortlist with the same effective application date and Group, we will look at who has the earliest Homesearch reference.

The only exceptions to this are where the property is a rural connection property (more information about this is in Appendix 5) or a specific needs property.

If an applicant has registered an interest in a property and moves into another Group during the advertising cycle this may result in them becoming ineligible for that property. In this situation their registration of interest will be withdrawn.

The Homesearch Team will forward the shortlist to the appropriate Registered Social Landlord. The Registered Social Landlord will offer the tenancy to the person at the top of the shortlist. If the Registered Social Landlord refuses to offer the property to the highest person then they must write to the person to tell them why. (Please see Section 9- Refusals)

People to whom we have a Homeless Duty

If you have been placed in Group A because of our homelessness duty you will keep this status for 3 months. If you have not found accommodation during this time, we will offer you a suitable property as soon as one becomes available. If you refuse this property, we may discharge our homelessness duty. This may mean that we re-assess your application and place it in a lower Group which matches your circumstances.

HomechoiceWest

HomechoiceWest is a sub regional scheme for the four Councils (Bath & North East Somerset, Bristol City, North Somerset and South Gloucestershire) in the West of England Partnership. When the scheme becomes live, a percentage of all properties will be advertised sub-regionally as given in Appendix 4. These properties will be randomly selected from each bed size. Applicants for these properties will be assessed according to the Council's policy where the property is located. Therefore, applicants wishing to be considered for sub-regional properties outside of their home Council may need to supply the Council where the property is located with additional information.

9 REFUSALS OF OFFERS

If you refuse a property

If you refuse 2 reasonable offers of accommodation after you have registered your interest and viewed the property your application will be suspended for 12 months. This is designed to ensure that applicants only register an interest in properties they are serious about, thus preventing abortive work which would impact on other applicants. See section 11 for details on how to appeal against this decision.

If a Registered Social Landlord refuses an Applicant

A Registered Social Landlord may only refuse to offer the vacant property for the following reasons:

- The person or a member of their household has demonstrated anti-social behaviour and is likely to create management problems for the landlord or unreasonably affect neighbouring tenants in the future;
- The person has unmanaged rent arrears relating to a current or former tenancy;
- The person was previously evicted for breach of tenancy conditions;
- The person has displayed threatening, violent or otherwise unreasonable behaviour towards a member of staff;
- A Local Lettings Plan is in place and the person's support needs are such that they would be unsuitable for that property;
- Unable to contact the applicant after all efforts have been made to contact the applicant;
- If the assessment of an applicant or household needs has not been fully completed, and an incomplete assessment might substantially misjudge the applicant's housing and support needs;
- If the nomination assessment indicates a need for further investigation, or reinvestigation of circumstances (e.g. a change to the medical circumstances), the applicant will not be considered for nomination until the investigations are completed;
- If information regarding a household's application appears to be false or misleading and further investigation is required;
- If the applicant does not attend a nomination assessment interview;
- If the applicant does not co-operate with the nomination assessment procedure;
- If an applicant has already been nominated for another property;
- If a nomination assessment interview with the applicant is not possible to arrange within the agreed timescales.

If the Registered Social Landlord refuses to offer the property to the highest person on the shortlist they must notify the Homesearch Team or the Housing Options and Homeless Team. They must also write to the applicant to tell them why and include information on how to appeal. The applicant will be advised of the appeal decision in writing. If the applicant is successful the RSL and Homesearch Team will work in partnership to directly offer the applicant the next suitable property which becomes available. This property should match the size and area of the property they were originally refused for. If the applicant refuses this offer of accommodation no further direct offers will be made. During this process the applicant can continue to participate in the bidding system. There is no further right to appeal.

10 SUSPENSION OF AN APPLICATION

Your application will be suspended for the following reasons:

- You are in supported accommodation and are not yet considered by your support worker to be ready for a tenancy.
- You have displayed violent, threatening, aggressive or otherwise unacceptable behaviour towards members of the Homesearch team or a Registered Social Landlord, the Council, the Homesearch Partnership or anyone connected to the Partnership and this behaviour still poses a risk.
- You are serving a prison sentence. Applications will be made active one month prior to release.

- You or a member of your household has support needs and the agreed care or support is not yet in place.
- If there is a need for further investigation, or re-investigation of circumstances
- You tell us, in writing, that you are not ready to move.
- Your application is being investigated for fraud, based upon reasonable grounds for suspicion, or we have been advised by our RSL partners that your application is inaccurate.
- You have refused 2 reasonable offers as explained in section 8, 'Refusal of Offers'.

11 CANCELLING AN APPLICATION

Your Homesearch application will be cancelled if:

- You have not responded to correspondence from us or when correspondence from us has been returned because it could not be delivered. Prior to cancellation you will be sent a further letter giving you 30 days to contact the Team.
- You do not bid for a property within five years. However, prior to cancellation you will be sent a minimum of two letters giving you the opportunity to advise us that you wish to remain on the scheme.
- You ask us to cancel your application. We will write to you to confirm that we have cancelled it.
- You have been housed through the Homesearch scheme.
- Your application is fraudulent.

If your application has been cancelled any new application you send us cannot usually be backdated.

12 APPEALS

Appealing about a Homesearch decision

The table below gives details of your rights of appeal against Homesearch decisions.

Appeal is about:-	Time limits to Appeal	Who looks at Appeal
Effective application date	30 days of date of registration letter	Adult Social Services, Health and Housing Manager
Local Connection	30 days of date of registration letter	Adult Social Services, Health and Housing Manager
Suspension of application following 2 refusals of accommodation	30 days of date of suspension letter	Adult Social Services, Health and Housing Manager
Social Award Decision	30 days of date of social decision letter	Adult Social Services, Health and Housing Manager

Medical Award Decision	30 days of date medical decision letter	Adult Social Services, Health and Housing Manager
Suspension or Cancellation of application for other	30 days of date of suspension/decision letter	Adult Social Services, Health and Housing
reasons		Manager

If you want to appeal you should put your case in writing, giving the reasons for the appeal and enclosing any supporting documents. If your appeal is rejected there are no second stage appeals.

13 FRAUDULENT APPLICATIONS

The Council and our partners undertake random sampling of Homesearch applications to ensure the information supplied is correct. If you deliberately provide false or misleading information in your application for housing you may be suspended or excluded from the Homesearch scheme. In addition giving fraudulent information is a criminal offence and may lead to prosecution and eviction from any housing accommodation offered.

14 SPECIAL CIRCUMSTANCES

In a very small number of cases a household will be directly allocated a property. This can occur when:

- A member of the household is severely disabled and it is essential to match the person to a suitably adapted property
- Applicants have an essential and exceptional medical or social need to live in a particular locality in the local authority, where failure to meet that need would cause hardship
- We have to fulfil our partnership obligations under the Multi-Agency Public Protection Arrangements and the National Witness Protection Scheme
- We have to comply with judicial instructions
- We have to discharge homelessness duty
- A large property is required for a priority homeless family

These cases can only be authorised by the Housing Services Manager or Group Manager (Housing & Health).

15 EQUAL OPPORTUNITIES

Bath and North East Somerset Council are committed to promoting equality of opportunity in delivering housing services. The Homesearch Team, Housing Services

and Partnership Registered Social Landlords aim to treat each application fairly and equally regardless of race, gender, ethnicity, age, religion, disability, marital status, sexual orientation, colour or political affiliation.

Regular monitoring of the Homesearch register, nominations to Registered Social Landlords and nomination outcomes will be undertaken and the evaluation of this fed into policy and service development.

16 LEGAL CONSIDERATIONS

This policy has been informed by the Housing Act 1996, as amended by the Homelessness Act 2002 and the Code of Guidance for local housing authorities on the Allocation of Accommodation (2008) including the prioritisation of specified categories of applicant.

17 INFORMATION SHARING

Information contained in the Homesearch application may be shared with other agencies including Registered Social Landlords, local authorities, the Home Office, Immigration and Nationality Directorate and other Government Departments and agencies.

This document can be made available in a range of languages, large print, Braille, (01225 396118 Fax: 01225 477839 Minicom 01225 477815)

ELIGIBILITY CRITERIA RELATING TO SIZE & TYPE OF ACCOMMODATION

The table below gives details of the size of the property households will be considered for:

Household Circumstances	Studio	1 bed	2 bed	3 bed	4 bed
Single person	V	1			
Couple		\checkmark			
Parent/couple with 1 child or pregnant			V		
Parent/couple with 1 child under 8 and pregnant			V		
Parent/ couple with 2 children (eldest under 8 years)			V		
Parent/couple with 2 children same sex (eldest 8 years or over)			V	V	
Parent/couple with 2 children of different sex (eldest 8 year or over)				V	
Parent/couple with 2 children and pregnant with 3 rd child				\checkmark	
Parent/couple with 3 or more children				\checkmark	

Due to the shortage of larger accommodation, families who need four or more bedrooms will be considered for large three bedroom properties.

Dependent Children

A child can only be added to your application if you are the primary carer and the child (ren) normally resides with you on a permanent full time basis and we have a copy of your 'eligible for child benefit' letter. We may also ask for confirmation of the child's address from the child's GP, Nursery, or School.

Joint care of Children

In situations where joint care of a child is equal, applicants may be considered for larger accommodation. Evidence to support this will usually be a Court Order. The decision will be made by the Homesearch Team Leader (See Section 11 Appeals).

Medical need for an extra bedroom

If you want to be considered for an extra bedroom on medical grounds you will need to provide written confirmation from medical services of the need for an extra bedroom, for example, for a resident carer or for medical equipment.

SHELTERED ELIGIBILITY CRITERIA

If you are aged 60 or over you can be considered for general needs, sheltered housing or both.

In addition, if you are between the age of 50 and 60 and in receipt of the middle or high rate care or mobility component of Disability Living Allowance (DLA) and your housing need cannot be met in general needs housing you may be considered for sheltered housing. Only in exceptional circumstances will applicants under the age of 50 be considered for sheltered housing. The final decision to accept a person for sheltered housing is made by the Registered Social Landlord.

GROUPING DETAILS

GROUP	You will be in this group if:
GROUP A	Statutory Homeless Duty You are accepted as Homeless (in priority need, not
Applicants who seek affordable accommodation	intentionally homeless and eligible to receive a full housing duty) by the local authority under Part VII of the
as a result of statutory	Housing Act 1996 (as amended by the Homelessness Act 2002).
requirements or those who are at a serious risk to their	Statutorily Overcrowded Your home is Statutorily overcrowded as defined by the Housing Act 1985 and confirmed by the Housing
health, safety and well- being. Or applicants with an	Standards Team.
agreed combination need to move. And who have an agreed need to live in the	Dangerous Housing Conditions Your home is dangerous and it is confirmed by the Housing Standards Team that a Housing Act 2004 Category 1 Hazard exists and cannot effectively be resolved through enforcement action.
area (see Group C criteria).	Urgent Medical Need See Appendix 6
	Urgent Social Need See Appendix 7
	Combination Need Your household has been given two Medium level priorities.
	Transfer to Sheltered Accommodation You are aged 60 or over and are renting general needs housing belonging to a Registered Social Landlord in Bath and North East Somerset and would like sheltered accommodation in this area.
GROUP B	Medium Medical Need
Applicants who have a medium level need for	See Appendix 6 Medium Social Need See Appendix 7
accommodation. And who have an agreed need to move to the area (see	Assisted Move on Scheme You are living in a property which is part of the Assisted move on scheme. Confirmation from project provider
Group C criteria).	including details of satisfactory support package details is required.

	Care Leavers You are a Care Leaver under the age of 21, living in insecure accommodation and referred to us by Bath and North East Somerset Social Services. Confirmation from Support Worker including details of satisfactory support package details is required.
	Prevention of Homelessness The Housing Options and Homeless Team have determined that you are in imminent risk of homelessness and the authority would have a statutory duty under section 184 of the Housing Act.
	Significant Overcrowding The Homesearch Team have determined that you are significantly overcrowded due to lacking 2 or more bedrooms. Please refer to the guidance in Appendix 1 regarding bedroom size and eligibility.
	 Strategic Management Move A strategic management move can be agreed by the Council's Housing Services Manager for the following reasons: a) Your home is owned by a Registered Social Landlord or Housing Association and the scheme, property or land is to be redeveloped. b) You are a Council employee in tied accommodation and are due to retire within 6 months.
GROUP C People who have an agreed need to live in the area.	Residency Your sole or main home is in Bath and North East Somerset Employment You are permanently employed in Bath and North East Somerset or have a firm offer of permanent employment in the area and this is confirmed by the employer
	Care Requirement a) You need to move to Bath and North East Somerset to receive intensive care and support from a close relative* and this is confirmed by the relative
	 b) You need to move to Bath and North East Somerset to provide intensive care and support for a close relative* and this is confirmed by the

	relative
	 You need long term specialist health, education or other support services that are only available in Bath and North East Somerset.
	Military Personnel
	a.) You or your partner have lived or worked in Bath and North East Somerset prior to or during military service, or
	b.) You or your partner has a close relative* living in Bath and North East Somerset and this is confirmed by the relative.
	*Eligible relatives are mother, father, adult brother or sister, or adult child over 18.
GROUP D People who do not meet the criteria in Groups A, B or C	No Agreed need to live in the area You do not meet one of the agreed need to live in the area requirements detailed in Group C. Students Students who have moved to the area to study at one of the colleges in Bath and North East Somerset

All priority is reviewed on a regular basis

GROUPING PROPORTIONS

Group	Proportion of Available Properties	
Α	50%	
В	30%	
С	20%	
D	Hard to let properties*	

*Properties with no registrations of interest from applicants in Groups A, B or C.

HomeChoice West property allocation

Properties to be advertised across the sub region	Proportion of Available Properties
HomeChoice West	5%

RURAL CONNECTION

In rural communities where there is a population of less than 3000, people with a local connection will usually be given priority when a property becomes vacant in the village.

Applicants must meet one or more of the following local connection criteria:

- Currently live in the village and have done so for at least the last year
- Have permanent employment in the village
- Have close relatives (mother, father, adult brother or sister, or adult child over 18) with whom there is ongoing positive contact and who currently live in the village and have done so for at least the last year
- Are not currently living in the village but have done so for 3 out of the last 5 years

Applicants who meet one or more of the above criteria to a surrounding village may be considered if there is no demand from applicants with a local connection to the village we are advertising.

RURAL EXCEPTION SITES

Some new build affordable housing has been developed on land outside of the village development boundary, where normally housing is not allowed to be developed. This is known as an exception site and this housing can only ever be for people with a local connection.

Applicants must meet one or more of the following local connection criteria which is taken from the Rural Exception Site Legal Agreement:

4.2 The Developer covenants with the Council at all times not to Occupy or allow or cause to be occupied any Affordable Housing Unit other than by anyone in need of Affordable Housing and who in priority order (with the greatest priority being given to the occupant described in 4.2.1:-

4.2.1 has immediately prior to occupation of the Affordable Housing Unit been resident in the Parish for five years or

4.2.2 has a strong local connection with the Parish based upon any one or more of the following criteria (with the greatest priority being given to the occupant described in (i):

- (i) prior to the time of commencement of occupation of the Affordable Housing Unit has lived in the Parish for three years
- (ii) has family associates in the Parish or
- (iii) is permanently employed in the Parish
- (iv) prior to the time of commencement of occupation of the Affordable Housing Unit has lived in the Parish

4.2.3 has immediately prior to occupation of the Affordable Housing Unit been resident in the adjoining parishes for a period of five years or

4.2.4 has a strong local connection with a parish in paragraph 4.2.3 above based upon the factors set out in paragraph 4.2.2

APPENDIX 6

MEDICAL NEED TO MOVE

If you or a member of your household has a medical condition which is affected by your current housing, you can ask for this to be taken into consideration by completing a Medical Assessment form. Alternatively, you can contact the Homesearch Team to discuss your medical condition with a Homesearch Advisor. (Please see section 11 for Appeals)

Medical priority will only be given in cases where a move to alternative accommodation would significantly improve or alleviate the medical condition. A person's current position on the register will be taken into consideration as well as their ability to access their own alternative accommodation in the private sector. We may use independent medical advice.

An Urgent Medical priority may be given:-

If you or a member of your household suffers from a severe continuing or a severe intermittent medical condition that is made substantially worse by your living circumstances and it would only be improved by a move to more suitable accommodation, rather than by having aids or adaptations.

and/or

If you or a member of your household has severe mobility problems which mean you are unable to use all your home, for example, you are unable to access the property, or are unable to climb the stairs to reach the WC or bathroom and this will only be improved by moving to another property.

and/or

If you or a member of your household suffers from an acute progressive or life threatening illness and this would lead to severe problems with your accommodation in the future.

and/or

If you depend on regular care from a named voluntary Carer who does not live with you and you would significantly benefit from living nearer to your Carer.

A Medium Medical priority may be given:-

If you or your household's current housing conditions are having a major adverse effect on quality of life due to a permanent medical condition.

and/or

There is an actual risk to physical safety and a severe effect on your daily life which cannot be improved by adaptations.

SOCIAL NEED TO MOVE

An officer from Adult Social Services and Housing can ask for a social award to be considered for an applicant. The representative will compile a report for the Social Award Panel, which includes members of Adult Social Services and Housing. (Please see section 11 for appeals)

Social priority will only be given in cases where a move to alternative accommodation would significantly improve or alleviate the social problem. A person's current position on the register will also be taken into consideration.

An Urgent Social priority may be given:-

If you or a member of your household's safety, independence or quality of life is seriously affected by your social circumstances and re-housing is vital and the only way to resolve the problem.

and/or

Your application has been on the Assisted Move On Scheme and you have been unable to successfully move on within a suitable period of time, **and** you have an urgent need to move.

and/or

If you are taking over child care arrangements for a child/children who were in the care of Bath and North East Somerset Council and your existing accommodation is preventing you from being able to take over the arrangement.

and/or

If you have been subject to racial or domestic violence, harassment or abuse which can be verified by the Police, Housing Association (where applicable) or support agency.

A Medium Social priority may be given:-

If you are experiencing acute social problems which would be improved or resolved by moving to other housing.

and/or

if you have support needs which cannot be met in your existing home, and moving closer to support providers will improve your daily life.

APPENDIX D

HOUSING REGISTER: AREA PREFERENCES FOR GENERAL NEEDS HOUSING

Demand for General Needs Housing at 17.8.11

Area Preference	Bed need	Number on Register
No preference stated	1 bed	1948
No preference stated	2 bed	773
No preference stated	3 bed	370
No preference stated	4 bed	126
No preference stated	5 bed	67
Tota	I No preference stated	3284
Bathampton	1 bed	51
Bathampton	2 bed	29
Bathampton	3 bed	6
Bathampton	4 bed	1
Bathampton	5 bed	3
	Bathampton	90
Batheaston	1 bed	48
Batheaston	2 bed	39
Batheaston	3 bed	10
Batheaston	4 bed	2
Batheaston	5 bed	4
Tota	I Batheaston	103
Bathford	1 bed	19
Bathford	2 bed	16
Bathford	3 bed	6
Bathford	4 bed	1
Bathford	5 bed	1
Tota	l Bathford	43
Bishop Sutton	1 bed	8
Bishop Sutton	2 bed	14
Bishop Sutton	3 bed	4
Bishop Sutton	4 bed	1
	I Bishop Sutton	27
Camerton & Tunley	1 bed	2
Camerton & Tunley	2 bed	
Camerton & Tunley	3 bed	5 2 2
Camerton & Tunley	4 bed	2
	I Camerton & Tunley	11
Central (inc Lansdown and Bathwick)	1 bed	883
Central (inc Lansdown and Bathwick)	2 bed	222
Central (inc Lansdown and Bathwick)	3 bed	43
Central (inc Lansdown and Bathwick)	4 bed	14
Central (inc Lansdown and Bathwick)	5 bed	7
	Central (inc Lansdown	
Tota	I and Bathwick)	1169

Charlcombe		1 bed	5
	Total	Charlcombe	5
Chelwood		1 bed	2
Chelwood		2 bed	1
Chelwood		3 bed	1
	Total	Chelwood	4
Chew Magna		1 bed	25
Chew Magna		2 bed	16
Chew Magna		3 bed	10
Chew Magna		4 bed	3
Chew Magna		5 bed	1
		Chew Magna	55
Chew Stoke		1 bed	22
Chew Stoke		2 bed	11
Chew Stoke		3 bed	7
	Total	Chew Stoke	40
Claverton		1 bed	9
Claverton		2 bed	10
Claverton		3 bed	3
Claverton		4 bed	3
Claverton		5 bed	1
	Total	Claverton	26
Clutton		1 bed	7
Clutton		2 bed	9
Clutton		3 bed	3
Clutton		4 bed	1
	Total	Clutton	20
Combe Down (inc Foxhill)		1 bed	89
Combe Down (inc Foxhill)		2 bed	52
Combe Down (inc Foxhill)		3 bed	17
Combe Down (inc Foxhill)		4 bed	6
Combe Down (inc Foxhill)		5 bed	2
	Total	Foxhill)	166
Combe Hay		1 bed	2
Combe Hay		2 bed	1
Combe Hay		3 bed	1
	Total	Combe Hay	4
Compton Dando		1 bed	4
Compton Dando		2 bed	2
Compton Dando		3 bed	1
Compton Dando		4 bed	2
	Total	Compton Dando	9
Compton Martin		2 bed	3
Compton Martin		3 bed	1
	Total	Compton Martin	4
Corston		1 bed	9
Corston		3 bed	2

Corston		4 bed	
Corston		5 bed	
	Total	Corston	1
Dunkerton		1 bed	
Dunkerton		2 bed	
	Total	Dunkerton	CARLES STREET
East Harptree		1 bed	-
East Harptree	_	2 bed	
East Harptree		3 bed	
		East Harptree	
Englishcombe		1 bed	
Englishcombe		2 bed	
Englishcombe	the second se	3 bed	
Ligheneernoe		Englishcombe	
Fairfield Park	and the second se	1 bed	
Fairfield Park		2 bed	
Fairfield Park		3 bed	
Fairfield Park		4 bed	
		Fairfield Park	
Farmharough		1 bed	
Farmborough			
Farmborough		2 bed	
Farmborough		3 bed	
Farmborough		5 bed	
<u> </u>		Farmborough	
Farrington Gurney		1 bed	
Farrington Gurney		2 bed	
Farrington Gurney		3 bed	
Farrington Gurney		5 bed	
	Total	Farrington Gurney	
Freshford		1 bed	
Freshford		2 bed	
Freshford		3 bed	
Freshford		5 bed	
	Total	Freshford	
High Littleton		1 bed	
High Littleton		2 bed	
High Littleton		3 bed	
High Littleton		5 bed	
	Total	High Littleton	
Hinton Blewett		2 bed	
	Total	Hinton Blewett	
Hinton Charterhouse		2 bed	
Hinton Charterhouse		3 bed	
Hinton Charterhouse		4 bed	
Hinton Charterhouse		5 bed	
		Hinton Charterhouse	
Kelston		2 bed	

Tota	Il Kelston	
Keynsham	1 bed	380
Keynsham	2 bed	323
Keynsham	3 bed	11
Keynsham	4 bed	3
Keynsham	5 bed	1:
	I Keynsham	87
Larkhall (inc Lambridge)	1 bed	94
Larkhall (inc Lambridge)	2 bed	5
Larkhall (inc Lambridge)	3 bed	1
Larkhall (inc Lambridge)	4 bed	
Larkhall (inc Lambridge)	5 bed	
Tota	I Lambridge)	17
Marksbury	1 bed	
Marksbury	2 bed	
Marksbury	3 bed	6
Tota	I Marksbury	
Midsomer Norton	1 bed	27
Midsomer Norton	2 bed	19
Midsomer Norton	3 bed	5
Midsomer Norton	4 bed	2
Midsomer Norton	5 bed	1
Tota	I Midsomer Norton	55
Monkton Combe	1 bed	
Monkton Combe	2 bed	
Monkton Combe	3 bed	ŝ
Tota	Monkton Combe	
Moorfield (inc Oldfield Park & Bear Flat,	1 bed	24
Moorfield (inc Oldfield Park & Bear Flat,	2 bed	11
Moorfield (inc Oldfield Park & Bear Flat,	3 bed	3
Moorfield (inc Oldfield Park & Bear Flat,	4 bed	1
Moorfield (inc Oldfield Park & Bear Flat,	5 bed	
	Park & Bear Flat,	
Tota	Moorlands & The Oval)	42
Nempnett Thrubwell	2 bed	
Tota	Nempnett Thrubwell	
Newton St Loe	1 bed	
Newton St Loe	2 bed	
Tota	Newton St Loe	
North Stoke	3 bed	
Tota	North Stoke	47.3-44 A
Norton Malreward	1 bed	ä
Tota	Norton Malreward	
Odd Down (inc Corston View)	1 bed	11
Odd Down (inc Corston View)	2 bed	6
Odd Down (inc Corston View)	3 bed	4

Odd Down (inc Corston View)		5 bed	Ę
	Total	Corston View)	232
Paulton		1 bed	72
Paulton		2 bed	70
Paulton		3 bed	20
Paulton		4 bed	3
Paulton		5 bed	3
	Total	Paulton	168
Peasedown St John		1 bed	81
Peasedown St John		2 bed	49
Peasedown St John		3 bed	20
Peasedown St John		4 bed	2
Peasedown St John		5 bed	
	Total	Peasedown St John	154
Pensford & Publow		1 bed	8
Pensford & Publow		2 bed	2
Pensford & Publow		3 bed	
	Total	Pensford & Publow	11
Priston	and the second second second	1 bed	
Priston		2 bed	
		3 bed	2
Priston			
		Priston	4
Queen Charlton		1 bed	(
	lotal	Queen Charlton	
Radstock (inc Clandown, Haydon,		1 bed	187
Radstock (inc Clandown, Haydon,		2 bed	161
Radstock (inc Clandown, Haydon,		3 bed	59
Radstock (inc Clandown, Haydon,		4 bed	32
Radstock (inc Clandown, Haydon,		5 bed	10
	ST. 6 1	Clandown, Haydon,	
	1.1.1.1.1.1.1	Writhlington &	
	Total	Westfield)	449
Saltford		1 bed	44
Saltford		2 bed	17
Saltford		3 bed	18
Saltford		4 bed	5
Saltford		5 bed	2
		Saltford	86
Shoscombe		1 bed	2
Shoscombe		4 bed	1
		Shoscombe	3
Snowhill	28 (1991) 5855888	1 bed	44
		2 bed	12
Showhill			12
Snowhill		2 hod	
Snowhill		3 bed	
		3 bed 4 bed 5 bed	1

South Stoke	1 bed	1
South Stoke	3 bed	1
	Total South Stoke	2
Southdown (inc Wedmore Park)	1 bed	79
Southdown (inc Wedmore Park)	2 bed	72
Southdown (inc Wedmore Park)	3 bed	17
Southdown (inc Wedmore Park)	4 bed	10
Southdown (inc Wedmore Park)	5 bed	2
	Total Wedmore Park)	180
Stanton Drew	1 bed	6
Stanton Drew	3 bed	2
	Total Stanton Drew	8
Swainswick	1 bed	5
Swainswick	2 bed	2
Swainswick	4 bed	2
	Total Swainswick	9
Temple Cloud	1 bed	22
Temple Cloud	2 bed	
Temple Cloud	3 bed	
Temple Cloud	4 bed	1
Temple Cloud	5 bed	
	Total Temple Cloud	42
Timsbury	1 bed	26
Timsbury	2 bed	16
Timsbury	3 bed	
Timsbury	4 bed	3
	Total Timsbury	52
Twerton (inc The Hollow)	1 bed	225
Twerton (inc The Hollow)	2 bed	101
Twerton (inc The Hollow)	3 bed	32
Twerton (inc The Hollow)	4 bed	10
Twerton (inc The Hollow)	5 bed	
	Total Hollow)	371
		51
Ubley	1 bed	2
Ubley	2 bed	
	Total Ubley	
Walcot	1 bed	41
Walcot	2 bed	6
Walcot	3 bed	
Walcot	4 bed	
Walcot	5 bed	
	Total Walcot	50
Wellow	1 bed	8
Wellow	2 bed	9
Wellow	3 bed	1
	Total Wellow	18
West Harptree	1 bed	6

West Harptree	2 bed	5
West Harptree	3 bed	3
West Harptree	4 bed	2
	Total West Harptree	16
Weston & Newbridge	1 bed	249
Weston & Newbridge	2 bed	130
Weston & Newbridge	3 bed	48
Weston & Newbridge	4 bed	19
Weston & Newbridge	5 bed	3
	Total Weston & Newbridge	449
Whitchurch	1 bed	32
Whitchurch	2 bed	22
Whitchurch	3 bed	12
Whitchurch	4 bed	6
Whitchurch	5 bed	1
	Total Whitchurch	73
Whiteway	1 bed	42
Whiteway	2 bed	32
Whiteway	3 bed	13
Whiteway	4 bed	5
Whiteway	5 bed	4
	Total Whiteway	96
Widcombe	1 bed	38
Widcombe	2 bed	23 3 2
Widcombe	3 bed	3
Widcombe	4 bed	2
	Total Widcombe	66
Total on Homesearch Register		9880

.

APPENDIX E

HOUSING REGISTER: AREA PREFERENCES FOR OLDER PERSONS HOUSING

Demand for Housing for Older Persons Housing (no care) at 17.8.11

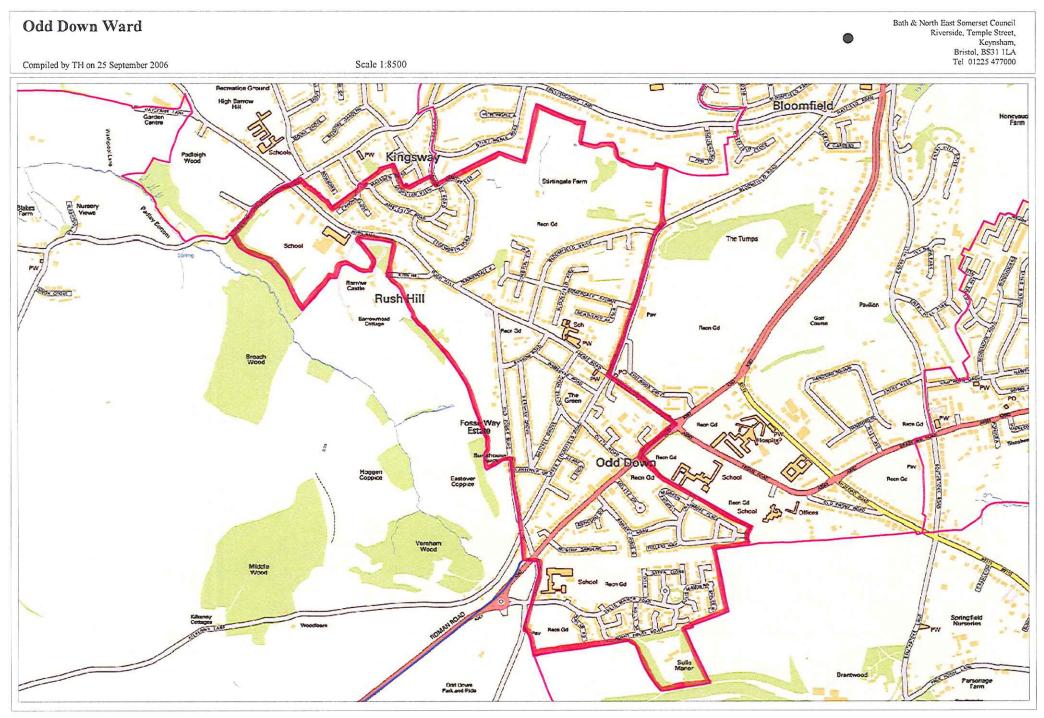
			Number on
Area Preference		Bed need	Register
No preference stated		1	527
No preference stated		2	29
	Total	No preference stated	556
Bathampton		1	15
Bathampton		2	1
Bathampton		3	1
	Total	Bathampton	17
Batheaston		1	9
	Total	Batheaston	9
Bathford		1	7 7
	Total	Bathford	
Bishop Sutton		1	3 3
	Total	Bishop Sutton	3
Central (inc Lansdown and Bathwick)		1	96
Central (inc Lansdown and Bathwick)		2	2
		Central (inc Lansdown	
	Total	and Bathwick)	98
Chew Magna		. 1	6
	Total	Chew Magna	6
Chew Stoke		1	1
	Total	Chew Stoke	1
Claverton		1	2
	Total	Claverton	2
Clutton	Total	1	4
	Total	Clutton	4
Combe Down (inc Foxhill)	Total	1	20
	Total	Foxhill)	20
Compton Danda	Total	1	3
Compton Dando	Total	Compton Dando	3
Farmharaugh	TOtal		
Farmborough	Total	1 Formborough	4
Family attack Ourse au	Total	Farmborough	4
Farrington Gurney	Tatal	1	6 6
	Iotal	Farrington Gurney	
Keynsham		1	131
Keynsham	-	2	5
	Iotal	Keynsham	136
Larkhall (inc Lambridge)	-	1	22
	Total	Lambridge)	22
Midsomer Norton		1	27
Midsomer Norton	in such as the	2	3
	Total	Midsomer Norton	30

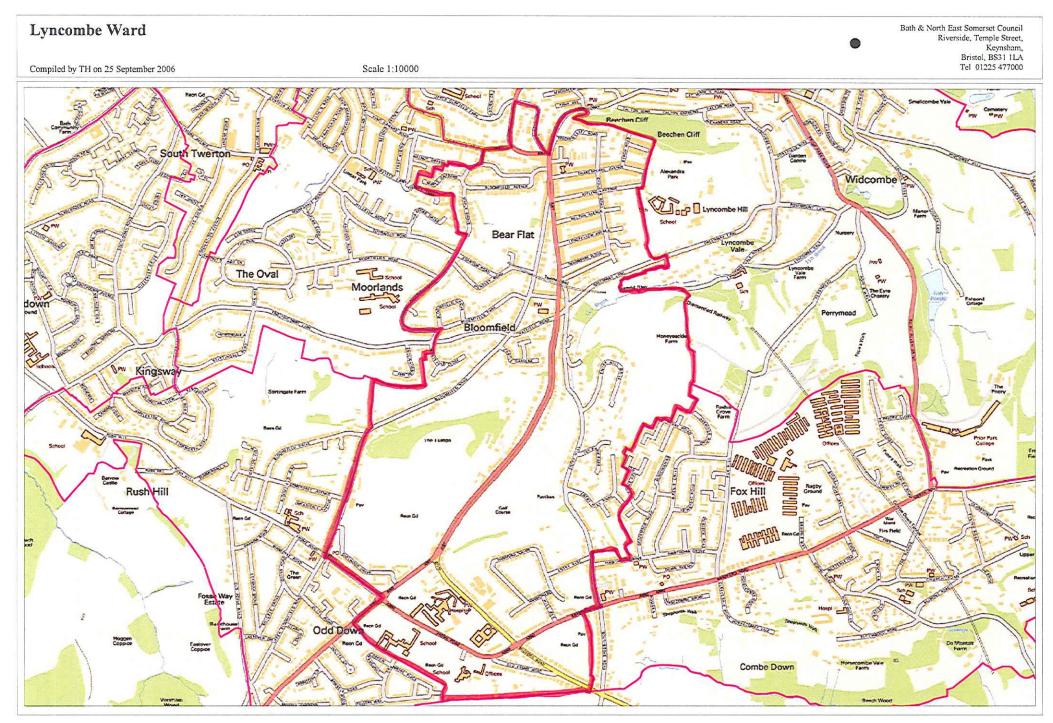
Moorfield (inc Oldfield Park & Bear Flat		1	4
Moorfield (inc Oldfield Park & Bear Flat	t,	2	
		Moorfield (inc Oldfield	
		Park & Bear Flat,	
	Total	Moorlands & The Oval)	4
Nempnett Thrubwell		1	
	Total	Nempnett Thrubwell	and the state of
Odd Down (inc Corston View)		1	2
Odd Down (inc Corston View)		2	
	Total	Corston View)	2
Paulton		1	1
Paulton		2	
	Total	Paulton	1
Peasedown St John		1	1
	Total	Peasedown St John	1
Pensford & Publow		1	
	Total	Pensford & Publow	
Radstock (inc Clandown, Haydon,		1	2
Radstock (inc Clandown, Haydon,		2	
		Clandown, Haydon,	Service a real of
		Writhlington &	
	Total	Westfield)	2
Saltford		1	2
	Total	Saltford	2
Snowhill		1	
	Total	Snowhill	
South Stoke	10141	1	
	Total	South Stoke	
Southdown (inc Wedmore Park)	Total	1	
		Southdown (inc	
	Total	Wedmore Park)	
Stanton Drew	TOtal	1 vedillore r arkj	
	Total	Stanton Drew	
Sweinewick	TOtal	Stanton Drew	
Swainswick	Total	Swainswick	
Tample Claud	Total	Swalliswick	
Temple Cloud	Tatal	Tomple Cloud	
	Total	Temple Cloud	
Timsbury	Tatal	1	
	lotal	Timsbury	1
Twerton (inc The Hollow)		1	1
Twerton (inc The Hollow)	Name of the	2	
	Total	Hollow)	1
Walcot		1	
	Total	Walcot	
Wellow		1	
	Total	Wellow	

West Harptree	1	1
Total	West Harptree	1
Weston & Newbridge	1	38
Weston & Newbridge	2	2
Total	Weston & Newbridge	40
Whitchurch	1	4
Total	Whitchurch	4
Whiteway	1	4
Total	Whiteway	4
Widcombe	1	4
Total	Widcombe	4
Total		1171

APPENDIX F

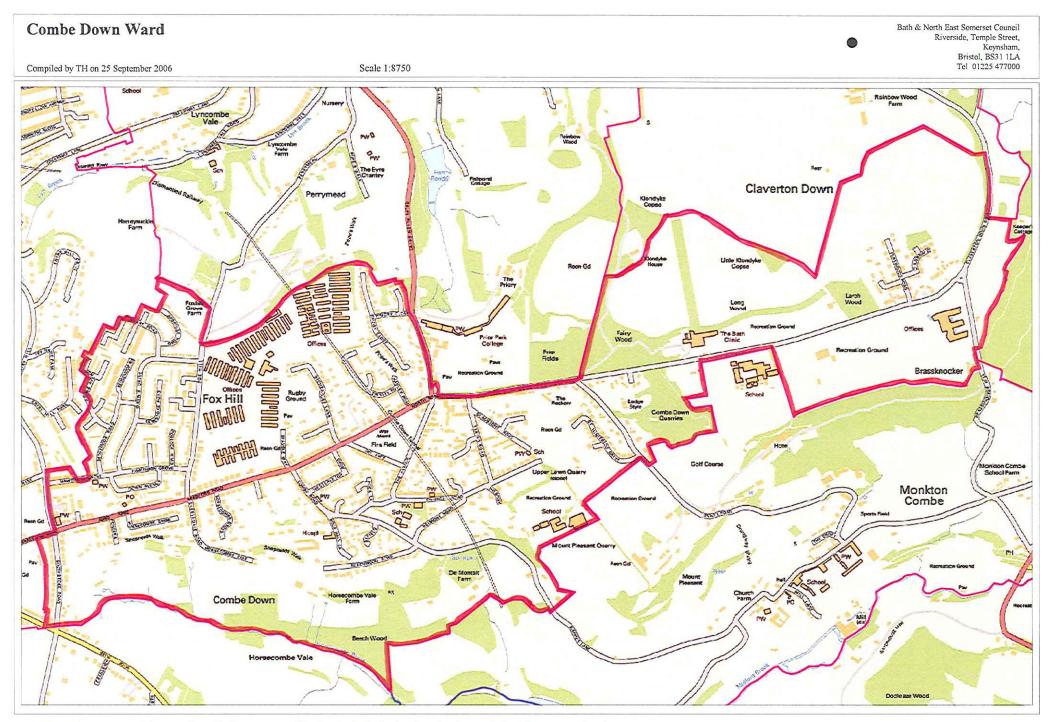
MAPS OF ODD DOWN, LYNCOMBE AND COMBE DOWN WARDS





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