

Wiltshire Council Planning Consultation Response – Housing Enabling Team

18th December 2023

Application No:	PL/2021/04084
Application Type:	Full planning permission
Proposal:	Residential development of 41 no. new dwellings comprising development on land to the west of Roger Way (Areas A&F), alongside the change of use of the vacant ground floor unit at Block C of the Old Sarum Local Centre (Area G), to provide for 7no. affordable apartments
Site Address:	Land to the west of Roger Way and Old Sarum Local Centre (Block C), Old Sarum, Salisbury, Wiltshire

Thank you for consulting the Housing Enabling Team on the above application. I note that the proposed development comprises two sites which currently have planning permission for employment use and a GP surgery. If through the planning process the development site is considered suitable for the proposed residential development, my comments and observations in respect of the affordable housing requirements are as follows:

Policy Requirements:

Core Policy 43 of the Wiltshire Core Strategy (as amended by the National Planning Policy Framework) sets out a requirement for 40% on-site Affordable Housing provision within the 40% Housing Zone, on all sites of 10 or more dwellings.

The proposals provide a total of 48 dwellings comprising 41 new build units on Area A/F and conversion of the vacant GP surgery into 7 flats. Whilst, for the purposes of the Affordable Housing provision, we would usually treat the two sites separately with a 40% Affordable Housing requirement for each site, given that the first and second floors of Block C are already occupied by Affordable Housing Units, it would be appropriate for management reasons that the ground floor also provides affordable units. The Affordable Housing provision on Area A/F will therefore provide the remaining Affordable Housing units to ensure that there is 40% Affordable Housing provision overall.

There is therefore a requirement to provide 19 affordable units within a scheme of 48 dwellings. As proposed by the applicant, 7 units should be provided on the Ground Floor of Block C and 12 units in Area A/F. This would meet the policy requirement and would assist in addressing the need for affordable housing in Laverstock and Salisbury where there is a high level of need for both affordable rented and shared ownership housing.

Tenure Mix:

In order to meet need, the affordable housing units should be provided with an overall tenure mix of 60% of the units (11 units) being for Affordable Rented housing, and 40% of the units (8 units) being provided for Shared Ownership. Currently 12 units are proposed for Affordable Rent and 7 for Shared Ownership. This tenure mix should therefore be adjusted.

Unit Size Mix:

Core Policy 45 of the Wiltshire Core Strategy states that housing size and type will be expected to reflect that of the demonstrable need for the community within which a site is located. There is currently a need for all sizes of affordable accommodation in Laverstock and Salisbury.

Block C:

Block C, Old Sarum Local Centre currently provides 14 Affordable Housing units on the first and second floor comprising 5 x 2 bed flats and 2 x 1 bed flats on each floor. The additional 7 affordable housing units should be provided in the following mix to reflect the tenure mix on the floors above:

Block C, Local Centre	
<u>Affordable Rented:</u>	<u>Shared Ownership:</u>
1 x 1 bed, 2 person flats	1 x 1 bed, 2 person flat
4 x 2 bed, 3 person flats	1 x 2 bed, 3 person flat

The tenure of the converted units in Block C should be shown on the plans.

Areas A & F

The applicant has previously been advised that the Housing Enabling Team does not support FOGs or 2 bed flats above ground floor level. I note that the applicant has provided a letter of support for FOGs from Sage Housing. Whilst it is appreciated that FOGs may work well in more urban authorities, it should be noted that they don't work well in Wiltshire and that Sage has no experience of delivering this type of unit in Wiltshire. The Housing Enabling Team's position, supported by our Registered Provider partnership is that FOGs and 2 bed flats above ground level are not supported, as due to the low demand for these types of units in Wiltshire, they are not considered to reflect demonstrable need in accordance with Core Policy 45 of the Wiltshire Core Strategy.

It should also be noted that in order to reflect demonstrable need, the following person number requirements should be provided:

- 1 bed / 2 person
- 2 bed / 4 person
- 3 bed / 5 person
- 4 bed / 6 person

Whilst the floorplans don't show furniture layouts, some of the bedrooms look as if they may be too small to accommodate the required person numbers. The applicant should confirm that the proposed units meet the minimum person criteria above.

The Unit Size Mix relating to Area A/F should be re-visited to take account of the above comments. A mix which would reflect demonstrable need would be:

Area A / F	
Affordable Rented: 2 x 1 bed / 2 person flats 2 x 2 bed / 4 person houses 1 x 3 bed / 5 person house 1 x 4 bed / 6 person house	Shared Ownership: 4 x 2 bed / 4 person houses 2 x 3 bed / 5 person houses

There is also a demonstrable need for adapted housing in Laverstock and Salisbury. On all schemes which provide more than 10 Affordable Housing units, it is requested that 10% of affordable units are provided as adapted units in order to help meet this need. These units should be provided to Building Regulations M4(2) standards with a level access shower provided. In this instance it would be appropriate to provide 2 Ground Floor flats as adapted units to meet demonstrable need. Please note that if these are provided in Block C, the applicant should ensure that entry through the communal areas is accessible. The applicant should confirm which units will be provided as adapted units.

Design of Scheme (including Minimum Floorspace Standards):

Affordable housing in Wiltshire is expected to meet high standards of design and quality, and to be visually indistinguishable from open market housing. When considering scheme design options, the following should be taken into account:

- **Clustering / Distribution:** The Affordable Housing units should be evenly dispersed, in small clusters, within mixed tenure developments.
- **Adjoining Properties:** To aid marketing/sales of Affordable tenures all Affordable tenures should, where possible, not be directly connected to the other affordable/market tenures in semi-detached pairs or in terraces.
- **Parking:** Electric Vehicle Charging Points or infrastructure should be provided for each affordable home to meet current building regulation and local requirements. The scheme layout should be designed to have as much in-curtilage parking as possible in order to facilitate the provision of on-plot Electric Vehicle Charging Points for the Affordable dwellings wherever possible. Parking courts are not considered suitable for affordable homes (other than for blocks of flats). I note that there do not appear to be sufficient parking spaces for the 4 bed properties (plots 40 and 41).

In order to ensure that the affordable housing units are eligible for inclusion in Homes England's Affordable Housing programme, we would advise that all affordable homes are built to meet at least 85% of the Nationally Described Space Standard (NDSS) relevant to the dwelling type and minimum person criteria. NDSS and 85% NDSS are shown in the table below:

Number of bedrooms	Number of bed spaces	NDSS			Minimum 85% NDSS		
		1 storey (sqm)	2 storey (sqm)	3 storey (sqm)	1 storey (sqm)	2 storey (sqm)	3 storey (sqm)
Studio	1p	39 (37)*			34 (32)*		
1b	2p	50	58		43	50	
2b	3p	61	70		52	60	
	4p	70	79		60	68	

3b	4p	74	84	90	63	72	77
	5p	86	93	99	74	80	85
	6p	95	102	108	81	87	92
4b	5p	90	97	103	77	83	88
	6p	99	106	112	85	91	96
	7p	108	115	121	92	98	103
	8p	117	124	130	100	106	111

*Where a one person flat has a shower room rather than a bathroom the floorspace may be reduced from 39 sqm to 37 sqm (NDSS) or from 34 sqm to 32 sqm (85% NDSS).

Transfer of Affordable Rented and Shared Ownership Units to Registered Provider:

The affordable dwellings will be required to be transferred to a Registered Provider, approved by the Council, or to the Council, on a nil subsidy basis.

It is strongly recommended that the applicant makes contact with Registered Providers and Wiltshire Council's Residential Development Team as soon as possible in order to discuss the best option for the affordable dwellings including an indication of transfer prices that can be expected. A list of Registered Providers who work in partnership with Wiltshire Council, and contact details for Wiltshire Council's Residential Development Team, can be provided on request.

Nominations:

The Local Authority will have nomination rights to the affordable dwellings, secured through a S106 Agreement.

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