

Wiltshire Council Planning Consultation Response – Housing Enabling Team

15th February 2024

Application No:	PL/2023/10495
Application Type:	Full planning permission
Proposal:	Conversion of Elmfield House and outbuildings to 6 x dwellings and the erection of 15 dwellings, hard and soft landscaping and associated works
Site Address:	Elmfield House, Petersfinger, SP5 3BZ

Thank you for consulting the Housing Enabling Team on the above application.

I note that the Planning, Design and Access Statement states that the proposed development will not provide any Affordable Housing due to viability. A Financial Viability Report has been submitted which tests viability with the following Affordable Housing mix:

Affordable Rented (5 units): 2 x 1 bed flats, 2 x 2 bed flats, 1 x 3 bed house

Shared Ownership (3 units): 3 x 3 bed houses.

It should be noted that the mix tested in the applicant's viability information would not be acceptable as:

- It doesn't meet demonstrable need (in accordance with Core Policies 43 and 45 of the Wiltshire Core Strategy) due to the lack of demand for 2 bed rented flats in Wiltshire.
- It is unlikely that the converted building would be suitable for transfer to a Registered Provider. The Affordable Rented and Shared Ownership units should therefore be provided as new build units.
- The tenure mix does not include First Homes which would form part of a policy compliant mix.

The viability information provided will need to be checked and agreed by an independent assessor. The viability of the scheme should be tested using a policy compliant mix as set out below. It should be noted that Affordable Housing should not automatically be the contribution that is reduced if viability is agreed as it should be a planning decision as to which planning obligation should be reduced in order to make the scheme viable.

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% Affordable Housing Zone, on all sites of 10 or more dwellings. There is therefore a requirement to provide 8 affordable units on a scheme with a net gain of 20 units. This would meet the policy requirement and would assist in addressing the need for affordable housing. The Affordable Housing should be secured, at nil subsidy, in a S106 Agreement.

In accordance with Core Policies 43 and 45 of the Wiltshire Core Strategy the tenure mix should reflect local need for affordable housing. It should also meet the government's requirement that 25% of the Affordable Housing units are provided as First Homes. In order to meet these policy requirements, the Affordable Housing units should be provided with a tenure mix of 60% of the units (5 units) being for Affordable Rented housing, 25% of the units (2 units) being provided as First Homes and 15% of the units (1 unit) being provided for Shared Ownership.

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. An indicative mix which would reflect current need would be:

Affordable Rented (5 units):

2 x 1 bed / 2 person (maisonette style) flat
 2 x 2 bed / 4 person houses
 1 x 3 bed / 6 person house

First Homes (2 units):

1 x 1 bed / 2 person flat
 1 x 2 bed / 4 person flat

Shared Ownership (1 unit):

1 x 3 bed / 5 person house

Should the viability assessment conclude that an Affordable Housing contribution is required, this should be provided on site and the location of the Affordable Housing units should be agreed with the Housing Enabling Team. The following advice should be taken into account if Affordable Housing is provided:

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. In designing the scheme, the following should be taken into account:

- The Affordable Housing units should be evenly dispersed across the site within mixed tenure developments.
- Two bedroom flats above ground floor level, and flats over commercial units or garages, are considered unsuitable for affordable units.
- Parking courts are not considered suitable for affordable homes (other than for blocks of flats). Parking should be provided in curtilage or adjacent to the property.

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 (other than First Homes) 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.

Sale of First Homes

Please note that First Homes must be discounted by a minimum of 30% against the market value, with the sale price, at first sale, no higher than £250,000 after the discount has been applied. They must be sold to qualifying first time buyers (with the discount and restrictions passed on to subsequent owners in perpetuity) in accordance with procedures and eligibility criteria set out in government guidance. Please see [First Homes - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/first-homes) for more information. First Homes should be marketed to households with a local connection to Wiltshire for the period that local eligibility criteria apply.

Nominations:

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

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