

Wiltshire Council Planning Consultation Response – Housing Enabling Team

10th April 2025

Application No:	PL/2025/02257
Application Type:	Outline planning permission: Some matters reserved
Proposal:	Outline planning application (with all matters reserved except access) for residential development, including the construction of up to 149 dwellings, new vehicular access with footways and cycleways, public open space, landscape and associated infrastructure.
Site Address:	Land to the North of Whychurch Farm and West of Crudwell Road, Malmesbury

Thank you for consulting the Housing Enabling Team on the above application. 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% Affordable Housing Zone, on all sites of 10 or more dwellings. There is therefore a requirement to provide 60 affordable units within a scheme of 149 dwellings. 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.

Tenure Mix:

In accordance with Core Policies 43 and 45 of the Wiltshire Core Strategy the tenure mix should reflect local need for affordable housing and should therefore be provided with a tenure mix of 60% of the units (36 units) being for Affordable Rented housing, and 40% of the units (24 units) being provided for affordable home ownership that could comprise of Shared Ownership and First Homes. The specific home ownership tenures / split will be advised by the Housing Enabling Team at the time of S106 drafting.

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

Affordable Rented: (36 units)

28% (10 units) - 1 bed / 2 person (house-style maisonette) flat or bungalow

9% (3 units) - 2 bed / 4-person bungalow

28% (10 units) – 2 bed / 4 person houses

28% (10 units) - 3 bed / 6-person house

5% (2 units) – 4 beds / 7-person house

2% (1 unit) 5 beds / 8-person house

Affordable Home Ownership (24 units)

(specific tenures to be advised by the Housing Enabling Team and included in the S106 Agreement):

70% (17 units) - 2 bed / 4-person house

30% (7 units) - 3 bed / 5-person house

However, I would welcome the opportunity to discuss and review the unit size mix as proposals develop.

Adapted Units - if there are 10 or more AH units:

There is also a demonstrable need for adapted housing in Malmesbury. On all schemes which provide more than 10 Affordable Housing units, it is requested that 10% of affordable units are provided as adapted units to help meet this need. These units should be provided as ground floor flats / bungalows to Building Regulations M4(2) standards with a level access shower provided. The adapted units should be provided as a mix of unit sizes of the affordable rented accommodation to meet demonstrable need.

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 considered:

- **Clustering / Distribution:** The Affordable Housing units should be evenly dispersed, in small clusters of no more than 15 units / in at least two clusters, within mixed tenure developments. Any First Homes should be distributed across the whole site. *(include if necessary and especially for larger site).*
- **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.
- **Distribution of 1 bed flats:** Any 1-bedroom flats should be provided in blocks of 6 to 8 units OR in maisonette style flats, each with a dedicated garden space.
- **No Flats over Garages / Commercial Properties:** Please note that due to potential maintenance and management issues flats over commercial units or garages are considered unsuitable for affordable units.
- **No 2-bedroom flats:** 2 bed flats above ground floor level are not considered suitable for affordable units. Demand for these types of units is low as most households on the Housing Register who are eligible to bid on a 2-bed property are families with children, for whom a 2-bedroom house with a garden is more suitable. The Council and its partner RPs are averse to this type of accommodation as it results in regular re-admittance to the Housing Register.
- **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 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).
- **Parking for M4(2):** Parking spaces for M4(2) units should meet the required standard with respect to location and width.

If, in accordance with the Wiltshire Design Guide, the market units are being provided to full Nationally Described Space Standard (NDSS), then the Affordable units should also be provided to that standard. If however full NDSS is not required for a specific scheme, we would require 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, in order to ensure that the affordable housing units are eligible for inclusion in Homes England's Affordable Housing programme. 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
5b	6p	103	110	116	88	94	99
	7p	112	119	125	96	102	107
	8p	121	128	134	103	109	114
6b	7p	116	123	129	99	105	110
	8p	125	132	138	107	113	118

*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 contacts 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/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 (Local Authority to provide first draft of the S106 to meet its current format).

Laurel Smith
Major Projects and Enabling