

Wiltshire Council Planning Consultation Response – Housing Enabling Team

19 May 2025

Application No:	PL/2025/03672
Application Type:	Full planning permission
Proposal:	Residential Development to provide 55 Dwellings, Public Open Space, Access, Drainage, Landscaping, Associated Infrastructure and Ancillary Works
Site Address:	Land East of Biddestone Lane, Yatton Keynell

Thank you for consulting the Housing Enabling Team on the above application. If through the planning process the proposed development is considered suitable, our comments and observations, in respect of the affordable housing requirements, are as follows:

Policy Requirements:

Core Policy 43 of the adopted 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 22 affordable units within this scheme of 55 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 adopted Wiltshire Core Strategy the tenure mix should reflect local need for affordable housing and should, therefore, under current policy procedures, be provided with a tenure mix of 60% (13 units) for Affordable Rented housing and 40% (9 units) provided for affordable home ownership which could comprise of a mix of Shared Ownership and First Homes - the specific home ownership tenures/split requirements to be confirmed by the Housing Enabling Team and agreed with the Applicant prior to completion of the S106 agreement.

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: (13 units)

- 2 x 1 bed 2 person (maisonette style) flats*
- 1 x 2 bed 4 person bungalow*
- 6 x 2 bed 4 person houses
- 4 x 3 bed 5 person houses

Affordable Home Ownership (Shared Ownership/First Homes) (9 units)

(Specific tenure details will be included in the SI06 Agreement)

6 x 2 bed 4 person houses

3 x 3 bed 5 person houses

There is also a demonstrable need for adapted housing. On all schemes which provide more than 10 Affordable Housing units, 10% of the affordable units will be sought as adapted units to help meet this need. Out of 22 affordable units, 2 adapted units should be provided as 1 x 1 bed 2 person ground floor maisonette style flat and 1 x 2 bed 4 person bungalow. These units should be provided to meet Building Regulations M4(2) standards, each having a level access shower rather than a bath in order to be wheelchair accessible, in order to meet demonstrable need. Disabled parking bays should also be provided for these 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 noted:

- **Clustering / Distribution**: The Affordable Housing units should be evenly dispersed, in small clusters of no more than 15 units, within mixed tenure developments. First Homes can be distributed across the site/integrated with the market houses.
- **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. Shared Ownership homes should be delivered as semi-detached pairs or in a small terraced row and not linked to the Affordable Rented units.
- **Distribution of 1 bed flats**: Any 1 bedroom flats should be provided in small blocks of 6 units and/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 the majority of households on the Housing Register who are eligible to bid on a 2 bed property have 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 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).
Parking spaces for M4(2) units disabled parking bays need to meet the required standard with respect to location and width.

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
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).

The affordable homes do not require garages but do require sufficient parking bays as per current policy guidance - ie: 1 x parking bay for each 1 bed, 2 x parking bays to be provided for each 2 or 3 bed house, 3 parking bays for each 4 bed house. Small parking courts are accepted for small blocks of flats only and in curtilage/ designated parking bays should be provided for the affordable houses (not bays in solid rows or blocks of shared use parking bays). Parking bays should be provided preferably in curtilage (to the side or immediately in front of their relevant plot) wherever possible.

Comment on the submitted layout:

We note that the Applicant has included the 40% (22 units) of Affordable Housing within the scheme proposed. However, the tenure mix which has been suggest will need some adjustment in order to meet the current demonstrable need, as detailed above, and also to meet the minimum 85% NDSS standards requirements ie:

Clustering

The Affordable Housing units are split into two clusters (one of 13 units and one of 9 units) which is acceptable.

2 x 1 bed 2 person Maisonettes (GF 51m² + FF 60.9m²):

Sizes shown on the scheme layout plan and the floor plans are above minimum 85% NDSS and these units therefore are acceptable.

The GF unit needs to be adapted to the standards mentioned above and a more detail floor plan for that unit will be required - to show the unit will meet M4(2), and showing a LAS not a bath, in order to be wheelchair accessible, and have a disabled parking bay shown on the Affordable Housing layout plan too.

1x 2 bed 4 Bungalow (60.2m²):

Sizes shown on scheme layout plan and the floor plan are above minimum 85% NDSS but the floor plan is showing this unit with 1 double and 1 single bed...this needs to show bed space for 4 people... either 2 doubles or 1 double and the other bedroom showing 2 single beds. A revised floor plan for this unit will be required.

This unit will also need to be a M4(2) adapted unit - adapted to the standards mentioned above and a more detail floor plan for that unit will be required - to show the unit will meet M4(2), and showing a LAS not a bath, in order to be wheelchair accessible, and have a disabled parking bay shown on the layout plan too. Again, revised plans will be needed to clearly show these points.

2 bed 4 person houses (67.2m²):

This house type is too small and does not meet minimum 85% NDSS – these units need to be 68m² or more to enable an RP to take the unit/obtain the grant funding. The size suggested (67.2m²) would fall into the 2b3p house, and we do not accept that size for 2 bed affordable houses in our AH mixes. This unit size needs to be amended in order to meet the minimum 85% NDSS requirement of 68m² or above. A revised floor plan and scheme layout details will be required.

The balance between 2b4p and 3b5p houses proposed for Affordable Housing does not reflect current requirements and there needs to be a minor adjustment. There are not enough 2b4p houses in the Affordable Housing mix proposed. The current Affordable Housing mix advised above requires 12 only 9 are shown (+3 are required). A revised Affordable Housing layout plan will be needed.

3 bed 5 person houses (80m2):

The size shown on the floor plan 80m2 for 3b5p houses does meet the minimum 85% NDSS size but 79.8m2 size is shown in the table on the scheme layout plan for the 3b5p houses which would not be acceptable. The layout plan needs to be amended to reflect the 80m2 floor plan size.

As mentioned above, the balance between 2b4p and 3b5p houses proposed for Affordable Housing does not reflect current requirements and there needs to be a minor adjustment. There are too many 3b5p houses in the Affordable Housing mix proposed. The current Affordable Housing mix advised above required requires 7 and 10 3b5p houses are shown on the proposed layout (-3 are required). An adjustment between the 2b4pH and 3b5p houses is needed. A revised Affordable Housing layout plan will be needed.

Parking

The correct number of parking bays have been provided for each plot, but some are not well associated with their respective houses ie: Plots 41 and 45 are at the rear rather than at the front of the units as the others are...it would be more preferable if these bays were also at the front or to the side of their relative properties. Could this arrangement for these parking bays be reviewed please. Also, please note comments made above re the provision of on-plot Electric Vehicle Charging Points for the Affordable dwellings.

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) 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 in order to meet its current format).

Julie Newitt

Principal Development Officer, Housing Enabling Team

Major Projects & Enabling-Economy and Regeneration

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