

Wiltshire Council Planning Consultation Response – Housing Enabling Team

12th January 2026

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. My comments and observations in respect of the Affordable Housing requirements follow on from previous comments made 15/02/2024.

I note that the current amended plans are not accompanied by statements which detail their objectives. It is also noted that these amended plans do not acknowledge Affordable Housing in any way, presumably this mirrors the approach taken by previous proposals which have not included the Affordable provision due to viability concerns.

Comments made by the Housing Enabling Team on 15th February 2024 noted that the viability report which had been provided by the applicant was not considered acceptable as it had not used a policy compliant Affordable Housing mix and had not been checked and agreed by an independent assessor, among other reasons. It is my understanding that Wiltshire Council provided comments on the Financial Viability Appraisal provided by the applicant approximately 11 months ago, however, we have not yet received a response to these comments.

It should also 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 is reduced in order to make the scheme viable. With this in mind, the following comments will be provided under the assumption that an Affordable Housing contribution is applicable.

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 within a scheme of 20 dwellings (net gain). 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. This has not changed from advice given within previous comments, which also included the following housing tenure and size mix which to ensure the Affordable Housing delivery is policy compliant:

Affordable Rented	First Homes	Shared Ownership
2 x 1-bed / 2-person (maisonette style) flats	1 x 1-bed / 2-person flat	1 x 3-bed / 5-person house
2 x 2-bed / 4-person houses	1 x 2-bed / 4-person flat	
1 x 3-bed / 6-person house		

In addition to the above it has been previously advised that, should the viability assessment conclude that an Affordable Housing contribution is required, then this should be provided as an on-site contribution and that the location of the Affordable homes should be agreed with the Housing Enabling Team.

Furthermore, it has been advised that the converted buildings are unlikely to be suitable for transfer to a Registered Provider. As such, the Affordable Rented and Shared Ownership units should be provided as new build units.

Design of Scheme:

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 at least two 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.
- **Distribution of 1 bed flats:** Any 1-bedroom flats should be provided 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 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 in order to facilitate the provision of on-plot Electric Vehicle Charging Points for the Affordable dwellings wherever possible. It is expected that layout plans provided will clearly detail the locations of these charging points. It should also be noted that parking courts are not considered suitable for Affordable homes (other than for blocks of flats).

Nationally Described Space Standards (NDSS):

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 Social 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) 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).

Kind regards,

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Major Projects and Enabling

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