

12th December 2024

REF: RM/24/98388

Rebecca Altman
Eastleigh Borough Council
Eastleigh House
Upper Market Street
Eastleigh
SO50 9YN

By email: rebecca.altman@eastleigh.gov.uk

Dear Rebecca,

RE: AFFORDABLE HOUSING COMMENTS ON PLANNING APPLICATION RM/24/98388

We are writing to you on behalf of our client Bargate Homes, in response to the comments made by Eastleigh Borough Council's Housing Enabling Specialist, in relation to the proposed affordable housing provision/mix at Land West of Allbrook Way, Knowle Hill, Eastleigh, SO50 4LZ.

Please accept this letter as our formal response in this respect.

The Proposed Provision of Affordable Housing

The application as submitted proposes 49 new homes, all of which are fully NDSS, sustainable homes set amongst an above-policy quantum of public open space. Of the 49 new homes 17 M4(2), and M4(3) affordable homes are provided. This reflects a policy compliant 35% of all new homes on the site being 'affordable'; and as you know, not all developments in the Borough deliver this high level (35%) of affordable homes.

Of the 17 new affordable homes, there will be 11.no affordable rent properties and 6.no shared ownership properties. This reflects the s106 agreement secured under the Outline Planning Permission whereby it was defined that the tenure split of affordable homes on the site will be 65% affordable rent and 35% offered for sale including shared equity or shared ownership schemes (65/35).

Of the affordable rent properties on the site there will be 2.no one beds, 5.no two beds and 4.no three beds. Of the shared ownership properties there will be 1.no one bed, 3.no two beds and 2.no three beds.

Housing Enabling Officer Comments on Proposals

Eastleigh Borough Council's Housing Enabling Specialist provided formal comments on the current application on the 4th of November 2024. The comments acknowledged that the proposed scheme provides a policy compliant 35% affordable housing provision, the expected 65/35 tenure split as detailed above and, that the proposed scheme has reduced the overall number of dwellings to 49, a reduction of 3 units in comparison the Outline Planning Permission. However, the comments requested that further review of the proposed housing mix is undertaken by the applicant; this review was requested because as stated within the comments:

"Whilst there has been a reduction in overall numbers and therefore a reduction in the affordable provision by 1No home the proposed mix has also changed is now weighted towards 1- and 2-bedroom provision. 65% of the affordable homes are either 1- or 2-bedroom homes resulting in a reduction of the proposed 3-bedroom homes and there are no 4-bedroom homes proposed within the affordable provision."

The comments proceed to compare this against the open market dwelling mix and states:

"The open market dwelling mix is made up of 9No 2 beds / 17No 3 bed and 6No 4 beds and of these 72% are either 3 or 4 bedrooms."

The comments continue to summarise that the Council needs to meet a range of housing need and that whilst the Housing Enabling Specialist acknowledges the fact that the Council is actively seeking 1 bedroom unit provision on sites, in this particular instance due to the overall number of affordable homes being provided, the Council would only support a maximum provision of 2.no 1 bedroom affordable units on this site; the comments then conclude that the Council is seeking at least 1.no 4 bedroom unit for affordable rent.

In addition to the comments made in respect to the mix and tenure detailed above, further clarity was requested within the comments regarding the intention for some units on the site to meet M4(3). The comments note that policy DM29 sets two criteria in this respect, one for market and one for affordable housing:

Market: *"i whereby at least 2 or 7% (if higher number) should meet Part M4(3) (2) (a) standard for wheelchair adaptable dwellings"*

Affordable: *"ii at least 1 or 8%, (if higher number) of all affordable housing should meet Part M4(3) (2) (b) wheelchair accessible dwellings."*

clarity was sought in relation to the affordable housing provisions wheelchair user accessibility as the plots noted within the submission demonstrated standard internal layouts.

Bargate Homes Formal Response to Comments

Firstly, and as you are aware, through the positive pre-application engagement with the Council undertaken by Bargate prior to the submission of the Reserved Matters Application, the scheme has evolved in a collaborative manner. As a result, the scheme has reduced the number of units by 3.no units (2x private and 1x affordable), due to the significant level changes throughout the site acting as a key physical constraint, as well as the requirement to include a larger drainage basin due to a lack of infiltration on the site. In addition, this reduction has also come in part due to Bargate's decision to go above and beyond in deciding to deliver an entire scheme with 100% NDSS compliant homes, providing a much higher quality scheme for the local community and future residents.

In addition, and as a result of the extensive pre-application engagement with the Council, the scheme was re-designed in terms of its layout and design in order to accommodate the feedback received. This included reviewing the central green corridor and further exploration in reducing the amount of hardstanding throughout the site which resulted in the inclusion of some plots being served via a rear parking court in order to achieve this. As a result of some of these quite substantial changes, the housing mix was forced to change in order to achieve a higher quality scheme, and a 2 bed FOG was introduced into the scheme.

Furthermore, Bargate is acting positively in committing to providing 100% Part M4(2) standard (Accessible and adaptable) dwellings which is above the Council's target of 80% of dwellings. Including policy compliant Part M4(3) (2)(a) standard for wheelchair adaptable dwellings (plots 41 and 42, private) and Part M4(3) (2)(b) standard for wheelchair accessible dwellings (plot 47, shared ownership)

Bargate provided an initial response to the Housing Enabling Specialists comments on the 14th of November 2024. This response acknowledged the comments made in respect to the mix, however it was explained in detail why changes to the mix cannot be accommodated easily without a potential impact upon the financial viability of the scheme and that as such, a degree of flexibility is required. Further, it is difficult to cater for one less 1-bedroom home in practical terms as two of these dwellings are Affordable Rent maisonettes, which makes it difficult for Bargate to mix the tenure. The other home is a 1-bedroom M4(3) bungalow.

The site continues to present a number of commercial constraints to Bargate in the form of several issues, such as site levels and drainage as referenced above; and in addition to these physical site constraints, Bargate is battling inflation and significantly higher build costs within the current economic climate. Yet despite these constraints, Bargate is still at present and based upon the submitted proposals, able to deliver 49 no. high-quality, fully NDSS, sustainable homes set amongst an above-policy quantum of public open space offering extensive planting opportunities, with fully policy-compliant affordable housing provision, M4(2) and M4(3) dwellings. All whilst finely balancing the financial viability of the development. It is important to emphasise here, that the scheme is currently balanced very finely in respect of its financial viability and therefore tampering with the current mix risks jeopardising this.

In summary, our initial response to the comments confirmed that the mix could not be altered as requested by the Housing Enabling Specialist.

The initial response provided to these comments also provided clarity on to the affordable housing provisions wheelchair user accessibility. It was confirmed that the submitted schedule of accommodation included an error in that the ROBIN GF house type is not an M4(3) unit. To clarify:

- BUZZARD (plots 41, 42.) M4(3) PRIVATE – Wheelchair adaptable; and
- JAY (plot 47) M4(3) – SHARED OWNERSHIP- Wheelchair accessible (bungalow).

On the 27th of November, we received a follow up comment from the Housing Enabling Specialist in response to the above, setting out some further alternative suggestions which in their view, could be more palatable to Bargate. The suggestions were as follows:

- *“Deliver the 1No bedroom wheelchair accessible bungalow for rent. This would allow an applicant from the housing register to access this accommodation. This would result in 12no rented homes and 5No homes for shared ownership”; and*
- *“Review the three-bedroom house provision to establish if there is scope for 2No 3-bedroom houses (for rent) to be replaced with another house type that will accommodate 6 persons instead of 5 thereby enabling us to meet a range of needs across the affordable housing provision”.*

These suggestions have been duly considered by Bargate, to see if they could be accommodated within the scheme. However, for the same reasons set out above in this letter, Bargate is not in a position whereby the split of Affordable Rent and Shared Ownership homes can be changed. In any case, this suggested change would result in a 70/30 split, a departure from the split detail agreed within the Outline Planning Permission. This would also trigger the need for a Deed of Variation, and again, significant costs associated with obtaining the DOV.

However, in being proactive, it was offered by Bargate that changing the 1No bedroom wheelchair accessible bungalow for rent, as requested, and swapping this for a 1No 2-bedroom house (KIWI) could potentially be accommodated. The split would remain as 11no Affordable Rented homes and 6no homes for Shared Ownership. This offering however was not welcomed as a suitable alternative solution in the view of the Housing Enabling Specialists view. As a result, the mix as proposed will not be amended.

In response to the second point above in relation the scope of providing a 3-bedroom 6-person home, in short, this cannot be accommodated due to a number of technical design considerations which make this very difficult to achieve on this site as set out below.

The impact of each policy requirement taken as a whole, make such a unit very large with a large footprint, requiring a level plot. On this site, there is not the space available that would be needed to increase the footprint of a 3-bedroom 5-person unit to a 6-person unit, to accommodate the additional bedroom space required and the necessity to deal with the 'knock on' effects of other compliance elements which come with it.

The impact of providing NDSS compliant homes includes internal layout requirements which when combined with the compliance of building regulations makes the home larger than the minimum Sqm required. For example, all bedrooms have greater m2 requirements, additional built in storage is required separately to any cylinder cupboard for ASHPs nor can this be in any areas with reduced headroom; if the storage were to be accommodated within bedrooms then this also cannot be included within the already larger than ordinary bedroom m2 requirements.

Then there is the impact of M4(2) building regulations which requires a larger WC and future proofed shower, larger doors throughout the home resulting in wider corridors thus resulting in a wider house. Larger bathrooms with additional mobility offsets and larger doorway to window clear zones in bedrooms on top of larger clear zones to the sides of bedspaces.

Finally, there is the impact of Housing Association Requirements, which in this case in the hypothetical context of a 3-bedroom 6-person home being provided, the kitchen would need to have a larger minimum capacity of 2.4 excluding any appliances. This therefore makes the space needed for a kitchen larger than in a private home.

All of these technical design considerations considered, a 3-bedroom 6-person home just would not fit on the site, without having to otherwise compromise the overall total number of units provided on the site.

Conclusion

The scheme as presented provides 49.no high quality fully NDSS, sustainable homes set amongst an above-policy quantum of public open space offering extensive planting opportunities, with fully policy-compliant affordable housing provision of 35% at the 65/35 affordable housing tenure split agreed under the Outline Planning Permission. Furthermore, Bargate is committing to providing 100% Part M4(2) standard (Accessible and adaptable) dwellings which is above the Council's target of 80% of all dwellings, including policy compliant Part M4(3) (2)(a) standard for wheelchair adaptable dwellings and Part M4(3) (2)(b) standard for wheelchair accessible dwellings.

The comments received by the Housing Enabling Specialist have been extensively considered by Bargate Homes in order to try and respond proactively with compromise wherever possible. However, the changes that have been requested, simply cannot be accommodated without risking the overall financial viability of the scheme and compromising the total number of units provided overall.

As a local developer owned by VIVID, Bargate Homes is passionate about providing high-quality, sustainable, and much-needed homes within the Eastleigh Borough. The development as proposed will make a significant and positive impact upon the Council's affordable housing need, with the provision of 17 high quality attractive affordable homes.

We trust this letter is sufficient in addressing the comments made to date, and therefore allows this application to continue towards a positive outcome.

Yours Sincerely



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