

Date of Meeting	26 th November 2015
Application Number	15/08539/FUL
Site Address	19 & 20 Woodstock Road Salisbury Wiltshire SP1 3TJ
Proposal	Change of use from residential (C3) to residential care home (C2) for adults of working age with mental health conditions
Applicant	Woodstock House Ltd
Town/Parish Council	SALISBURY CITY
Electoral Division	ST EDMUND AND MILFORD
Grid Ref	414592 130797
Type of application	Full Planning
Case Officer	Georgina Wright

Reason for the application being considered by Committee

Councillor McKeown has called the application to committee for the following reasons:

- Scale of development
- Relationship to adjoining properties

1. Purpose of Report

To consider the above application and the recommendation of the Area Development Manager that planning permission should be **APPROVED subject to conditions**.

2. Report Summary

The main issues which are considered to be material in the determination of this application are listed below:

- Principle of development
- Character of the area
- Residential amenity/living conditions
- Highway safety/parking

The application has generated Objection from Salisbury City Council and 13 letters of representation and a petition with 31 signatures.

3. Site Description

The site is situated within the Principal Settlement of Salisbury, as defined by Wiltshire Core Strategy (WCS) policies CP1 (Settlement Strategy), CP2 (Delivery Strategy) and CP20 (Salisbury Community Area). It is also situated within the Salisbury Central Area, as defined by WCS policy CP22 (Salisbury Skyline) and the saved Salisbury District Local Plan (SDLP) policies H7 and E3.

The site currently consists of a pair of terraced houses which are at the end of a row of approximately 20 terraces (that continue on from the site's pair of terraces

in a southerly direction). Number 20 has previously received retrospective planning permission to be used as a house in multiple occupation (HMO) but otherwise the properties are 2½ storeys in height and of Victorian, domestic, architecture. The two properties benefit from long, narrow front and rear gardens, which front onto the Woodstock Road and back onto the Salisbury Ring Road (A36) respectively. Woodstock Road is a no through road.

The majority of the terraced properties in this row, including the two relevant to this proposal, have converted the front gardens to hardstanding to provide off road parking. To the north the site abuts the parking and communal gardens serving a detached, three storey block of flats. Whilst to the west, a row of residential garages/gardens exist, which serve the residential properties fronting onto Marlborough Road. The character of the area is inherently residential.

4. Planning History

Application Ref	Proposal	Decision
S/2012/0429	Installation of dropped kerbs to provide off road parking	Permission – 08.05.2012
S/2009/1423	Change of use of dwelling house to a house of multiple occupancy (Retrospective)	Permission – 17.11.2009
S/1984/1309	Proposed additional bedroom	Permission – 08.12.1984

5. The Proposal

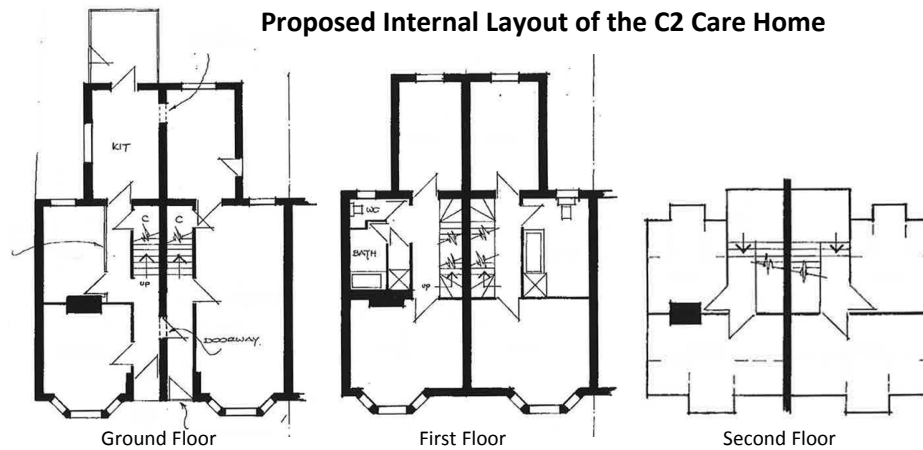
This is a full application proposing the change of use of 19 and 20 Woodstock Road (the two terraces at the end of the existing row of dwellings) from residential (Use Class C3 – Dwelling House) to a residential care home (Use Class C2 – Residential Institution). The conversion will create 9 bedrooms for adults of working age with mental health conditions. The facility is to be staffed 24 hours a day by 3 full time and 2 part time members of staff (including management).

The documentation suggests that number 20 is already in use as a care home (use Class C2) and already provides 4 bedrooms for adults of working age with mental health conditions. However there is no record of this on the site's planning history and the applicant has confirmed that this has only been in operation since 13th November 2012. The Council's Adult Social Care Commission has also confirmed that the existing 4 bed unit operating from number 20 Woodstock Road became a mental health accredited provider with Wiltshire Council in January 2013. This application is therefore part retrospective and seeks to regularise the existing 4 bedrooms for this use and to create an additional 5 units by amalgamating number 20 with 19 Woodstock Road.

The physical alterations that are involved in the creation of this facility are fairly minimal. They consist of the following:

- The blocking up of the front door of number 19 Woodstock Road

- The creation of a new doorway between the hallways of the two properties
- The creation of a doorway to link the two kitchens; and
- The erection of a new stud partition wall at ground floor in number 20 Woodstock Road to create an additional bedroom.



The proposals also involve the removal of boundary treatment between the two front gardens of 19 and 20 Woodstock Road to enable a total of 6 parking spaces to be provided to serve the facility (3 rows of 2 parking spaces in a tandem arrangement) in an area that currently only provides 3 parking spaces.

During the course of the application an amended plan has been received which has identified the provision of a new smoking shelter in the rear garden of number 20 Woodstock Road. This has been provided in response to comments received during the application and is aimed to provide the residents of the facility with a dedicated area for smoking.

The application is supported by a Statement of Purpose which sets out the facility's pledge to its residents in terms of the level of service that it offers; a Supporting Planning Statement; and the Care Quality Commission's Inspector's Report for the existing facility that operates from number 20 Woodstock Road, which was undertaken in April 2015 and concluded that the existing facility operates at a 'GOOD' standard.

6. Local Planning Policy

National Planning Policy Framework (NPPF)

National Planning Practice Guidance (NPPG)

Salisbury District Local Plan policies (Saved by Wiltshire Core Strategy) (SDLP):

R2 – Recreational Open Space in new developments

H7 – Loss of Housing

Wiltshire Core Strategy (WCS):

CP1 (Settlement Strategy)

CP2 (Delivery Strategy)

CP3 (Infrastructure Requirements)

CP22 (Salisbury Skyline)

CP43 (Providing Affordable Housing)
CP45 (Meeting Wiltshire's Housing Needs)
CP46 (Meeting the Needs of Wiltshire's Vulnerable & Older People)
CP50 (Biodiversity and Geodiversity)
CP57 (Ensuring High Quality Design & Space Shaping)
CP61 (Transport & Development)
CP62 (Development Impacts on the Transport Network)
CP64 (Demand Management)

7. Summary of Consultation Responses

Salisbury City Council: Objection

- The conversion of No.19 from C3 to C2 for residential care homes for adults will be overbearing on the existing residential community.

Public Protection: No Objection subject to conditions

- It is noted that a number of local residents have written in concerned about the proposals and the impact this may have on the amenity of the street and inside of their properties.
- In regards to the comments that have been made regarding disturbances in the street and Police involvement these are not matters that this department is able to comment on and would suggest consulting with the Community Safety Team and Police.
- In regards to noise emanating from individual bedrooms in the proposed property and the impact of this noise on the amenity of the adjoining property we do have some concerns. The property would house a number of individuals with a range of diverse needs; some of the residents may be very vulnerable. This department has recent experience of investigating a complaint about noise created by a vulnerable person where a noise abatement notice was ultimately served. Due to the range of needs and the number of individuals residing in the proposed property are likely to have it is recommended that the party wall is treated with improved insulation.
- Similarly the communal sitting room in the property is also of concern. It is likely that the use of a communal sitting room for a property that houses nine adults plus staff may create higher levels of noise than the use of a sitting room for the average family. This room should also be treated with an increased level of sound insulation.
- Professional advice will be necessary when deciding on sound insulation measures that will be required in the bedrooms and sitting room. It is recommended that a scheme is designed and then submitted to this department for approval.
- It appears from the letters that have been sent in that residents smoking outside of the property has, in the past, given rise to issues about noise on the street from residents and their friends gathering to smoke. It is recommended that the applicant implement a smoking area for residents and that this area is monitored by staff to ensure minimal disturbance is caused.

Highways: No Objection subject to informative

- The proposals involve an increase in the current provision to 6 spaces which adheres to current parking standards for residential homes
- The proposals will not have a detrimental impact upon highway safety
- No highway objection raised
- Please bring to the applicants attention the need to apply for permission from the Highway Authority for the kerb changes

Housing: No Comments to make

Wiltshire Council Adult Social Care Commission: Support

- Woodstock Road became a mental health accredited provider with Wiltshire Council in January 2013, and was known at that time as 'Dennetts'.
- We have placed at Dennetts continually since that time.
- We place approximately 119 adults of working age into temporary residential care per year, this number has risen from around 80 placements just 3 years ago.
- The delayed discharge from hospital situation in Wiltshire remains a concern and although not all of these would be suitable for Dennetts they are one of our better performing providers and one where vacancies are snapped up very quickly.
- There are other providers in Salisbury but we also have to consider the quality cost and the type of service being delivered. There are a high number of providers on safeguarding alerts which immediately (and rightly) means we cannot use them. But Dennetts is the type of provider we want to encourage.
- If this is refused, the existing 4 beds are an existing Care Quality Commission registered residential care home, which is currently full of Wiltshire residents who would have to be moved.
- I am pleased to hear that the residents feel the existing home has worked well within the community which is something we do not want disrupted and it is positive that they have had discussions with the owners of this residential home.
- The expansion would increase the number of residents from 4 to 9.
- Homes of this type vary considerably in size, some can be large enough for 15 residents or more but 9 residents is not unusual.
- My understanding is that by using interconnecting doors internally the provider has been able to maintain the domestic feel of each house.
- The home is regulated by the Care Quality Commission but is not a hospital, therefore as with everyone else living in the community who may or may not have a mental health issue residents are free to come and go as they please.
- Going out participating and contributing to community activities, visiting friends etc is an important part of their recovery.
- Assessments are conducted by Mental Health professionals and look at all aspects of a person's life, for instance physical, spiritual, intellectual, emotional and social needs. When considering accommodation they will

- be looking for an environment which is safe for the person and those around them and where the person will be able to achieve their recovery.
- For some this will be a temporary stay in residential care.
 - Woodstock Road is part of a range of Residential care homes in Wiltshire with 24 hour cover which work with residents to manage and improve their mental health and well-being, improve physical health and self-care and improve living skills to live more independently.
 - The homes have strong links with professional and community colleagues in health and social work services, who all work together to support the residents, and monitor their progress.
 - I am sorry to hear of some of the incidents described by the residents, but it is also confirmed that the people involved were not connected to the Woodstock Road Home.
 - Unfortunately incidents happen in all towns and cities and whilst I appreciate the concern they generate, generally the perpetrators are more likely not to have a mental health issue.
 - In all cases where there is unacceptable behaviour it should be addressed whether the person has a mental health issue or not.

8. Publicity

This application was advertised through the use of a site notice, press notice and letters of consultation.

13 letters of representation were received from the residents of 1a, 1b, 4, 5, 7, 13, 14, 15 & 18 Woodstock Road; and 2 & 18 Marlborough Road. A petition signed by 31 people from Woodstock Road & Marlborough Road has also been received. The following comments were made:

- Over development
- Number 19 is already a care home providing housing for 4 adults with mental health conditions. Whilst there is no objection to the existing use, this level of such a use is enough for the size of this road
- Increasing from 4 to 9 will saturate the area
- This is a primarily residential area and such uses should therefore be controlled for only small numbers and level of occupants per facility
- Lots of anti-social behaviour, noise and litter associated with the existing care home and unsocial hours of comings and goings. Occupants can be intimidating for the elderly residents/young families living in this area, esp. at night and various fracas have already resulted in police attendance
- Sound proofing measures required from the sitting room and bedrooms that adjoin 18
- Residents not allowed to drink or smoke in the property and so currently lots of residents do these activities on the street/outside or in garage blocks/parking areas in the vicinity which causes noise and disturbance and litter
- Block of flats next door provides social housing which also generates noise and problems with drunks/substance abuse and fights in the street late at night
- Already several other homes in the vicinity catering for individuals with special needs such as: 20 Woodstock and 9 Marlborough Road already

provide facilities for adults with mental health issues; 24 Marlborough Road is a hostel for supporting rehabilitation of young offenders; there are at least 2 other houses on Wyndham Road providing similar facilities; and 1 in Hamilton Road.

- Existing uses fit in well with the community but there has to be a limit for what this small residential area should be expected to support.
- The change from 4 to 9 will change it from a small community facility to a large business that is inappropriate in this primarily residential/family area.
- Comparative level of staff increase outlined to provide care for the 9 residents is inadequate and irresponsible
- Layout will not be effective for staff to care for all 9 occupants or to know what is going on in each unit
- Current occupants are allowed to come and go as they please but once out of the facility there is no control or supervision
- Neighbouring residents have no input or control over the selection process for future occupants of this facility
- Will be unsettling for existing residents of the existing care home to double the size of the facility
- The current C3 use limits the use to a maximum of 6 residents. Changing this to 2 properties and a C2 use removes this ceiling and there would be nothing to prevent a future expansion of the facility
- Proposing to block the front door of number 19 which causes concern for fire escape/safety
- Increased chance of fire given the type of occupants; 2 kitchens; and limited staff
- Need fire protection in the loft space to prevent fire spread to the rest of the terrace
- These are Victorian houses and modern safety measures are difficult to install
- Parking is a major problem in Woodstock Road already. Extra staff and visitors will only heighten the problem
- Changing both front gardens into an amalgamated parking area will change the design, appearance and layout of the front garden and will be out of keeping with the character of the street
- Narrow road. overspill parking will limit access for emergency vehicles
- Will effect house prices
- Better places elsewhere in Salisbury for this type of use
- Plans on the Council's website are apparently incorrect

Wiltshire Fire & Rescue Service: No Objection subject to an informative
Applicant Response: The applicant has made the following comments in response to the letters of representations received:

- As a registered care home we already have a fire safety policy in place
- Also have regular Health and Safety Training for all staff.
- I would consider the service to be at less risk of fire than a normal family home with the safety measures that are in place.
- Every service user has a care manager, who monitors the overall placement as part of the referral process and we would receive individual risk assessments and care plans.

- It is made clear in the placement contracts that if at any time the placement is not appropriate than it can be terminated.
- There is daily monitoring and staff engagement working with individuals to promote safety and monitor deterioration in mental health, where the appropriate services can be contacted 24/7.
- As part of our compliance to meet the regulations of the Care Quality Commission we assess the level of risk and ensure it is suitable for the capabilities of the service and our staff team.
- The key to our service is we focus on getting to know our service users and support a proactive approach to deterioration in mental health so it minimises the risk of crisis support.
- Also we build consistent relationships with all individuals involved in their care including family members if appropriate.
- As a service we continue to support individual's uniqueness and encourage and promote neighbourhood links which is evident from certain community feedback.
- At present we have 5 staff members of which 2 use cars regularly.
- We have off road (via dropped kerbs) parking for up to 4 cars between the 2 houses, as well as the 2 spaces at the bottom of the drive.
- We have parking spaces available for staff members, health care visitors and family but, as part of our aims and objectives we encourage the right of independence to all our service users
- Due to the nature of our service we encourage all our residents to access relevant appointments as you and I would in the community, therefore limiting health care professional visiting the service.
- Staffing would increase as part of this proposal but by existing team members increasing hours. Future employment of staff would only be on a part time basis.
- We address any issues raised by the neighbours and have a complaints procedure in place which we adhere to and is monitored by ourselves as part of our team meetings and staff supervisions, and by Care Quality Commission.
- We have close links with the local police who visit the service regularly and know our residents due to the links formed.
- We are a service for adults with mental health problems of a working age. We are a recovery based service our main ethos is to enable individuals to feel safe and secure and to gain the independent living skills they require to live independently,
- We have a referral process and a collaborative working process where we have the skills, support, training and knowledge to determine who is suitable for the service and our fully compliant staffing levels.
- Individuals who suffer from mental health issues often struggle with lack of motivation. This impacts on going out and general building of social networks. Whilst we have been a service on this street for nearly 3 years the only complaint we have received is that an individual had left a can on the street which we dealt with on a 1-1 basis, in house meetings and staff meetings.

- We have observed anti-social behaviour on the street. We acknowledge and accept that disruption can happen within a community and it is about how it is managed but those incidents are not generated by our facility.
- We as a team have experience, knowledge and skills to undertake this expansion in a compliant and safe manner.
- We are a “home” and the individuals in our service now and who we plan to have in the future are people who have the right to be treated with dignity, respect and equality, and if these much needed services are not provided the welfare on individuals will suffer.
- I find it very difficult to understand how 9 individuals who need support, on a street of 21 houses and 9 flats could possibly be “overbearing”.

9. Planning Considerations

Section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004 require that the determination of planning applications must be made in accordance with the Development Plan, unless material considerations indicate otherwise.

The main issues for consideration for this application are:

- Principle of Development
- Character & Design
- Neighbouring Amenities
- Parking/Highways
- S106/CIL

9.1 Principle:

The site is situated within the Principal Settlement boundary of Salisbury where WCS policy CP45 (Meeting Wiltshire’s Housing Needs) seeks to ensure high quality design and the creation of sufficient adapted housing, extra care accommodation, residential care and nursing home facilities to meet expected demand. In addition WCS policy CP46 (Meeting the Needs of Wiltshire's Vulnerable & Older People) confirms that the provision of sufficient new accommodation for Wiltshire’s older and vulnerable people will be supported, including nursing accommodation; residential homes; and extra care facilities. This policy also confirms that the provision of homes and accommodation for vulnerable people will be supported, provided that they are to be provided in sustainable locations, where there is an identified need, and good access to services and facilities.

In this instance the proposals involve the creation of a care home within the Principal Settlement boundary of the City. The site has good access to services and facilities and is within walking distance to the City centre and many forms of public transport. It is therefore considered to be in a sustainable location. The Council’s Housing Team has no specific comments to make about this particular application and the Council’s Adult Social Care Commission has confirmed that there is a need for such facilities in the City and that the existing 4 bed care home (albeit unlawful in planning terms) is one of the best such facilities in the City. It is therefore considered that the principle of such a proposal in this location is acceptable.

The overall acceptability of this scheme will however be subject to the detailed design; impact for neighbouring amenities; and highway safety, which are all therefore addressed in more detail below.

9.2 Character & Design:

As has been identified above, the site is in an inherently residential area. The existing buildings are of residential appearance and of typical Victorian architecture which is replicated across the entire row of terraces. The proposed use is a form of residential use and is therefore considered to be appropriate in this existing residential area. The Council encourages a mix of house types and tenures and balanced communities; and indeed supports the creation of housing to meet specific needs and for the more vulnerable in society. It is therefore considered that the creation of such a facility in this residential area would be acceptable and in keeping with this residential area.

Local concern has however been raised about the level of such accommodation that already exists in the area; and the City Council are concerned that the introduction of 9 bedrooms for such a use, will have an overbearing impact on the existing residential uses. However there is no planning policy stipulation that sets out a maximum number of such units in any one area and instead the relevant policies only seek to secure further facilities in order create a balanced community meeting all of the individual needs of all of the residents. Neither the Housing Team nor the Public Protection Team have objected to the proposals and there are other mechanisms for dealing with any anti-social behaviour that might be occurring in the area, although it is clear from the supporting documentation that the existing facility already has good links with the local Police.

In addition, as has already been identified above, this is a residential type of use that in planning terms is therefore appropriate in a residential area. It is not considered that the proposed use of the building will be that discernible from the street and therefore it is not considered that they will have a significant impact on the existing residential character of the area. Indeed the existing use of Number 20 has not resulted in any particular change to the appearance of the building which instead still appears (on the face of it) to be a residential dwelling. It has also been confirmed that very little physical alteration is proposed to the dwellings in order to convert and amalgamate them for this purpose and in that respect it is considered that the detailed design and its impact on the character of the existing building/street scene will be minimal.

Local concern has been raised about the loss of garden area that is proposed in order to expand the car parking area to the front of the dwellings to serve the care home. However both of the front gardens to the two properties are already hard surfaced and provide parking for each dwelling (2 spaces for number 20 and 1 space for number 19). The removal of a section of front hedgerow in order to enable a more efficient parking layout to provide 6 car parking spaces on this area of hard standing is not development that requires planning permission and could therefore be undertaken regardless of this decision. In addition, the majority of the front gardens serving the properties along this entire terrace have been altered in order to accommodate off street parking for vehicles. Whether

such a provision is to serve a dwelling or a care home facility is not considered to result in a significantly different impact for the character of the area. As such it is considered that this change to the front garden would not justify a defensible reason for refusal of the scheme.

9.3 Neighbouring Amenities:

Local concern has also been raised about the noise/disturbance and anti-social behaviour that could be associated with such a use and fears have been raised about its compatibility with a residential area. However as has been addressed above, in planning terms the proposed use is a residential form of development and is in the same C class as a dwelling (Use Class C3) or HMO (Use Class C4), which has previously been found to be acceptable on this site. The management of such facilities is not a planning matter and is controlled by other legislation and regulations governed by the Care Quality Commission and/or the Council's Adult Care Commission Team. In any event it is clear that number 20 has been operating as a C2 care home, albeit without planning permission, for the last 3 years and local representation has confirmed that this existing element has been operating effectively and with little implication for neighbouring amenities. The Council's Adult Care Commission Team has also confirmed that the existing unit is one of the best in the City.

With regard the anti-social activity that has occurred in Woodstock Road, which has been identified by a number of local residents, there is no evidence to suggest that this has been generated from the existing 4 bed facility that is already operating from 20 Woodstock Road. In any event such matters are also not planning matters and are instead governed by the management body responsible for the facility (if such issues do relate to the occupants of the facility) or are matters for the police. It is not considered that they would warrant a reason for refusal of this planning application or even suggest that the use of the two units for a Care Home for 9 occupants would be unacceptable in this area.

It is also worth noting that the two dwellings could be converted, without any form of planning permission, into two separate HMOs providing 6 bedrooms each (12 in total). This has previously been accepted for 20 Woodstock Road and there is nothing to stop 19 following suit. There is no control over the type of occupant or management of their comings and goings for such HMOs in planning terms, but it is considered that this represents a legitimate fall-back position for the two dwellings. In light of this potential future use, it is considered that the use of the two dwellings as a single, well managed care home for 9 residents is likely to be more appropriate and result in less of an impact for residential amenities than 2 HMOs.

The Environmental Health Officer has suggested a number of conditions relating to noise attenuation measures being installed along the party wall between 19 and 18 Woodstock Road; and the provision of a smoking shelter to serve the facility. Subject to these measures the Council's Public Protection Team has raised no objection to the proposals. Amended plans have been submitted to provide a smoking shelter and the identified conditions have been attached to the recommendation. It is therefore considered that any potential harm for

neighbouring amenities will be sufficiently mitigated and/or managed and is again not sufficient enough to warrant a refusal of the proposal.

9.4 Highway Safety:

Local concern has also been raised about the level of parking provision that is proposed to serve the 9 bed facility and associated staff and visitor parking. However the Proposals involve the provision of 6 parking spaces to serve the development. The Highway Authority has confirmed that this level of provision meets the current parking standard requirements for such a use and has raised no objection accordingly.

10. Conclusion

The site is situated within the main built up parameters of the City and is within an existing, sustainable residential area. There is an identified need for such facilities and WCS policies CP45 (Meeting Wiltshire's Housing Needs) and CP46 (Meeting the Needs of Wiltshire's Vulnerable & Older People) support the further provision of such facilities in sustainable locations. With appropriate conditions there are no objections from the Public Protection Team or Highway Authority and this application is therefore recommended for permission accordingly.

RECOMMENDATION

Permission subject to conditions & notes

- 1) The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

REASON: To comply with the provisions of Section 91 of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.

- 2) The development hereby permitted shall be carried out in accordance with the following approved plans:
Plan Ref: WR/001, Received: 25.08.2015. Existing Floor Plans & Location Plan
Plan Ref: WR/002 A, Received: 05.11.2015. Proposed Floor Plans

REASON: For the avoidance of doubt and in the interests of proper planning

- 3) The change of use hereby approved shall not be first implemented until a scheme outlining the proposed noise insulation and attenuation measures along the party wall of 19 and 18 Woodstock Road has been submitted to and approved in writing by the Local Planning Authority. The agreed noise attenuation measures shall be implemented in accordance with the approved details and specification prior to 19 Woodstock Road being first brought into use for C2 purposes and maintained/retained as such in perpetuity.

REASON: The application contained insufficient information to enable this matter to be considered prior to granting planning permission and is considered to be necessary in the interests of the residential amenities of the area.

Informative:

- 1) The application involves the existing two dropped kerbs being joined and therefore the footway between the two current dropped kerbs would also require lowering. The consent hereby granted shall not be construed as authority to carry out works on the highway. The applicant is advised that a licence will be required from Wiltshire's Highway Authority before any works are carried out on any footway, footpath, carriageway, verge or other land forming part of the highway. Please contact our Vehicle Crossing Team on vehicleaccess@wiltshire.gov.uk and/or 01225 713352
- 2) The applicant is advised that the development hereby approved may represent chargeable development under the Community Infrastructure Levy Regulations 2010 (as amended) and Wiltshire Council's CIL Charging Schedule. A separate Community Infrastructure Levy Liability Notice may be issued by the Local Planning Authority. Should you require further information with regards to CIL please refer to the Council's Website www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/communityinfrastructurelevy
- 3) The applicant's attention is drawn to the letter dated 15.09.2015 from Wiltshire Fire & Rescue Service which sets out recommendations for ensuring that the proposals are safe and are able to meet building regulations.