

DAWSON WILLIAMSON ARCHITECTS

Proposed Development of Existing Site

at

**Vale Works
25 Morley Lane
Milnsbridge
Huddersfield
HD3 4NS**



AFFORDABLE HOUSING STATEMENT

Demolition of existing industrial / office buildings & construction of new building containing 18 No residential apartments (C3) along with associated external works to form off street car parking and ancillary facilities.

Revisions

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1.0 Introduction

1.1 Overview

This Affordable Housing Statement is submitted by Dawson Williamson Ltd, on behalf of the Applicant, Mr Alan Batley; and as part of a planning application for a proposed building housing residential apartments on land off Morley Lane, Milnsbridge, Huddersfield.

1.2 Associated Statements

This affordable housing statement should be read in conjunction with the other supporting documents that accompany this planning submission.

These include:

R1050 PIS	Planning Statement
R1050 HIAS	Heritage Impact Assessment Statement
R1050 CPMS	Crime Prevention Measures Statement
R1050 NBO	Neighbouring Business Operation Statement

1.3 Context

This statement addresses the affordable housing provision set in the context of national and local planning guidance.

1.4 Requirement

This Affordable Housing Statement has been submitted because:

- a. The site is on brownfield land;
- b. The scheme proposes in excess of 15 No. dwellings.

1.5 Reference Drawings

A Site Layout Plan, and various Floor Layout Plans are submitted with the planning application.

These set out the overall proposal and the intended mix of properties.

2.0 Planning Policy

2.1 Context

The provision of affordable housing to meet a community's needs is a material planning consideration, which may properly be taken into account in formulating development plan policies. Government guidance also indicates that local planning authorities may indicate an overall target for the provision of affordable housing when there is a demonstrable shortage.

The Development Plan for the area comprises:

The National Planning Policy Framework (2012)

Planning Practice Guidance

Saved policies in the adopted Kirklees Unitary Development Plan (1999)

Supplementary Planning Guidance.

Due to the age of these policy documents and the supersession by changes to national planning policies, the weight to be given to them will be set out in this section.

2.2 National Planning Policy

The national policy context for the provision of affordable housing through the planning system is provided through the National Planning Policy Framework, and within Planning Practice Guidance Documents.

Earlier documents, such as Planning Policy Statement 3 (PPS3) - Housing (2006), and Regional Spatial Strategies have now either been superseded by the aforementioned documents, or abolished completely.

National Planning Policy Framework

Chapter 6 (Delivering a wide choice of high quality homes), Paragraph 47, states:

To boost significantly the supply of housing, local planning authorities should:

- 1. use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period*
- 2. identify and update annually a supply of specific deliverable¹ sites sufficient to provide 5 years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land*
- 3. identify a supply of specific, developable² sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15*
- 4. for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target*
- 5. set out their own approach to housing density to reflect local circumstances*

Paragraph 50, of the aforementioned Chapter 6, goes on to state:

To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should:

- 1. plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes)*
- 2. identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand*

3. *where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time*

In addition, Paragraph 159 (Plan making), states:

Local planning authorities should have a clear understanding of housing needs in their area. They should:

1. *prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment:*
2. *should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which;*
 - a. *meets household and population projections, taking account of migration and demographic change;*
 - b. *addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);*
 - c. *caters for housing demand and the scale of housing supply necessary to meet this demand; and*
3. *prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period."*

Finally, Annex 2 provides a definition for affordable housing, as:

Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.

Social rented housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other Affordable Housing Statement persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency.

Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable).

Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity)."

Planning Practice Guidance

Planning Practice Guidance documents which specifically refer to housing policy are:

- Housing and economic development needs assessment (20 March 2015);
- Housing and economic land availability assessment (6 March 2014);
- Housing: optional technical standards (27 March 2015).

These documents are guidance information that points in the direction of specific policies or paragraphs of the National Planning Framework.

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It is clear that affordable targets should take into account both viability and practicality, with regard to local circumstances. It is the responsibility of the local authority to provide viability evidence which demonstrates that affordable housing targets set by the council are achievable.

2.3 Local Planning Policy

The Kirklees Local Plan

Submitted 25 April 2017 (Possible adoption: Early 2018)

The Kirklees Local Plan was submitted to the Secretary of State for Communities and Local Government on 25 April 2017, and is still currently being examined by an independent inspector.

It is therefore still in the consultation stage, and has not yet come a policy.

The Kirklees Local Development Scheme (LDS) 2014

The Kirklees Local Development Scheme is the timetable for producing the planning documents that will make up the Local Plan. This LDS is required under Section 15 of the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011).

The Kirklees Unitary Development Plan (UDP) Adopted 1 March 1999

As of 28 September 2017, various policies within the UDP have been classified as “saved policies”, meaning that they are still active policies within the decision making of the local authority planning department.

Saved policies relevant to this statement include:

Policy H1

Housing (Chapter 11)

The housing needs of the district will be met by:

- (i) Improving existing housing particularly through the designation of renewal areas and areas for housing improvement;*
- (ii) Providing land to meet the requirement for a range of house types by allocation sites of various sizes and in different types of locations having regard to local patterns of demand;*
- (iii) The provision of houses affordable to those lease able to compete in the housing market; and*
- (iv) Applying appropriate planning standards for houses in multiple occupation and residential homes for the elderly.*

Policy H10

Affordable Housing

The provision of affordable housing will be a material consideration when planning applications are considered. The council will negotiate with developers for the inclusion of an element of affordable housing where the lack of affordable housing has been demonstrated. The extent and nature of affordable housing provision will have regard to:

- (i) evidence of local need;*
- (ii) the size of the site and its suitability in terms of access to local services and facilities and the availability of public transport;*
- (iii) the viability of the overall development; and*
- (iv) the degree to which a mix of dwelling sizes and types is provided.*

The Provision of Affordable Housing

11.35 The provision of affordable housing to meet a community's needs is a material planning consideration, which may properly be taken into account in formulating development plan policies. Government guidance (PPG3) also indicates that local planning authorities may indicate an overall target for the provision of affordable housing when there is a demonstrable shortage.

Affordable Housing Needs

11.36 Affordable housing can be defined as housing provided for those whose incomes generally deny them the opportunity to purchase a house on the open market. In addition to housing to rent, low cost housing for sale and residential mobile homes may constitute affordable housing.

11.37 Analysis of income levels and house prices undertaken in the council's Housing Strategy indicates the gap that now exists for many wage earners between what they can afford to pay to buy a house and the cost of a mortgage. Kirklees is generally an area of poor pay levels and around 55,000 households, 38% of the total, have economically inactive heads, with around 38,500 of these being retired head of households.

11.38 For those persons unable to buy on the open market rented accommodation, either from the Council or housing associations (HAs), has provided for those in greatest need. Private rented accommodation is not usually an option for priority groups because of cost and the limited supply. The stock of public sector rented accommodation has been substantially reduced by the introduction of 'right to buy' and since 1985 4,600 council houses have been sold thereby depleting the supply of affordable rented accommodation.

During this same period limitations on the public sector borrowing requirement have prevented the Council from building replacement dwellings, and HA building rates have fallen well below the rate of loss of rented accommodation.

11.40 Assessment of the need for affordable homes undertaken in the preparation of the Council's Housing Strategy and the 'Housing Association Development Strategy' indicates a need for 3,800 additional units of affordable accommodation within the next 5 years and 6,900 over 10 years. Quantification of the need is based on the council's housing waiting lists, which are updated at regular intervals. Analysis of this information, supplemented by homelessness data, empirical information from the 16 local authority housing management teams in Kirklees, and updated socio-economic profiles from the 1991 Census of Population, has been undertaken to give a prioritised list of area needs according to household type and this shows that most management areas in the District have high priority needs for affordable housing of one form or another. The information will be used as a basis for directing future provision in accordance with the needs of the community.

11.41 To meet the need for affordable homes the Council will continue to support the work of HAs and seek to maintain and increase the funding levels of the Housing Corporation which grant aids HA schemes in the District. HA building rates have increased in recent years and they presently contribute about 300 dwellings per annum. The Council has also initiated partnerships with the private sector, and with a combination of gifted land and cross subsidy a number of schemes are underway to provide affordable rented accommodation and low cost home ownership. These initiatives are expected to contribute about 140 units per annum over the next 5 years.

11.42 Despite these efforts there is likely to be a shortfall in affordable housing provision to meet the identified need. Even taking an optimistic view of HA building rates there is likely to be a shortfall of 1,200 to 1,600 units in the first 5 years of the plan. The identified shortfall provides the necessary evidence to indicate that it is appropriate for the Council to negotiate for the provision of affordable housing within new development proposals. The level of need is too high to be used as a target figure, because it is not reasonably achievable through private sector housing developments. However, a contribution towards the shortfall can be expected where the circumstances, with regard to the suitability of the location of the site and the economics of development, suggest that affordable housing should be included.

Housing Policy H10 refers to the justification and requirements for proposed affordable housing. Please refer to Section 3.0 for further comment in relation to this.

Policy H11

In exceptional circumstances, planning permission may be granted for proposals which make provision for affordable housing to satisfy a clear local requirement where housing development would otherwise not be permitted, providing that environmental and highway considerations can be satisfied. In the green belt sites must be small-scale and within or adjoining existing villages where it can be demonstrated that there is no suitable alternative site outside the green belt.

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11.43 Making appropriate provision for affordable homes should be considered by developers at an early stage in the development process, although it may not be until the detailed planning stage that the precise numbers, house types and layout arrangements are fully agreed. The Council will expect to reach agreement on the appropriate level of provision to reflect local needs through negotiation. Where negotiation is unsuccessful the government has indicated that it may be appropriate to withhold planning permission where inadequate consideration has been given by developers to the inclusion of affordable homes.

11.44 It is recognised that the provision of affordable dwellings in a development scheme will have implications for the scheme's viability and that developers will need to be clear about likely requirements at the outset of negotiations. The Council will prepare supplementary planning guidance to provide appropriate advice to assist with negotiations. The scale above which developments are likely to be capable of supporting the provision of affordable units is included in government advice.

11.45 A range of means may be used by developers, including HAs, and the private sector building for sale, so as to provide housing at an affordable price, such as discounted land value and cross subsidy. The Council will also be sympathetic in dealing with design and planning considerations in planning applications which achieve reductions in unit development costs, to the benefit of the provision of affordable housing. It may for instance be possible to maximise the number of dwellings on a site, by careful attention to layout and design, without compromising standards of privacy and open space.

Additionally where it can be demonstrated that car ownership levels will be lower than normal a reduced standard of off-street car parking will be acceptable. Partnerships between private developers and HAs may often be appropriate using housing association grant (HAG) to subsidise dwelling costs.

However, within the overall scheme, the HAG contribution should be considered as extra subsidy enabling the supply of units to be increased or their price to be reduced since the policy objective is to secure extra funding of affordable housing provision and not simply a redistribution of HAG.

Housing Policy H11 refers to the specific provision of affordable housing where housing development would not otherwise be permitted, in the context that permission may be granted (assuming other considerations can be satisfied) where a clear local requirement is demonstrated.

This is most relevant where housing is proposed within green belts, within rural areas, and at the edge of villages, etc...; and so is not specifically relevant to this application.

Policy H12

Prior to the grant of planning permission for development proposals incorporating affordable housing to meet local needs, arrangements will need to have been made to ensure that such housing will remain available for all time for local residents in proven housing need who cannot afford a house on the open market.

Arrangements for Securing Affordability

11.49 Where affordable housing is to be provided secure arrangements will be needed to ensure that those houses go to the people for which they were intended and that the arrangements will last in the longer term through successive changes of ownership and occupation. One common approach will be for an agreement to be arranged with a HA or approved housing trust to undertake future management arrangements. Where a body of this kind, established to meet social housing needs and with the necessary experience to allocate housing to those in need, is contracted by legal agreement to control the affordable housing, it will not usually be necessary for the Council to retain a long term interest in occupancy. However, if no such arrangements can be put in place conditions and legal agreements will be the most suitable way forward to maintain the long- term availability of the dwellings, at affordable prices, to those in need. Housing built for sale which is agreed will meet affordable housing objectives i.e. low-cost market housing, will not need to be covered by these arrangements.

Housing Policy H12 is to ensure that the affordable housing remains as such going forward. Please refer to Section 3.0 for further comment in relation to this.

2.4 Supplementary Planning Documents

Kirklees LDF (Local Development Framework)

Supplementary Planning Document 2, Affordable Housing (November 2008)

The LDF SPD 2, Affordable Housing (November 2008) states a requirement for 15% of proposed habitable floor area as affordable dwellings (within implementation plan).

Given that the total habitable floor area proposed within the scheme is 848.21 sqm, this would therefore equate to provision of affordable dwellings with a total area of 127.23 sqm.

This is the equivalent of 3 No. proposed 1-bed Apartment Dwellings.

However...

Kirklees Interim Affordable Housing Policy 2016

Draft Interim Affordable Housing Policy

The Draft Interim Affordable Housing Policy states that on developments of 11 or more dwellings, the council will negotiate with developers for the provision **20% affordable units** based on the number of dwellings on market housing sites or meet the requirements of Starter Homes Regulations set out nationally or an appropriate combination of the two.

Given that the total number of dwellings within the scheme is 18 No., this would therefore equate to a provision that **4 No. of these be affordable dwellings.**

It is proposed that the affordable homes should be incorporated within the development, but where justified and agreed with the LPA, a financial contribution of at least equal value of median build costs for Kirklees recognised by the RICS Build Cost Information Service (BCIS) may be accepted to provide affordable homes elsewhere or to improve the existing housing stock.

It is intended that the affordable housing provision should:

- a. cater for the type of affordable need identified in the latest housing evidence in terms type, tenure and size;
- b. incorporate appropriate arrangements to retain the benefits of affordability for initial and subsequent occupiers for affordable rent and shared ownership schemes, or for the subsidy to be recycled for alternative affordable housing provision; or for Starter Homes Schemes to accord with the requirements of the Starter Homes Regulations set out nationally, and
- c. be indistinguishable from market housing in terms of achieving the same high quality of design. Transfer values for affordable units are set out in Appendix A and are subject to review where considered appropriate.

2.4 Neighbourhood Planning

No Neighbourhood Plan has been prepared by Kirklees Council for Milnsbridge or surrounding area.

3.0 **Proposed Affordable Housing Provision**

3.1 ***The affordable housing provided will be affordable to those in genuine local need***

It is confirmed that the affordable housing provision will be for those of genuine local need.

3.2 ***Number of affordable dwellings proposed for delivery on the site***

Unless it is evidenced to the local planning authority that such an obligation would render the scheme not economically viable, the proposed scheme would make provision for 4 No. of the proposed residential units being affordable in accordance with the definition set out at Annex 2 of the National Planning Policy Framework. The tenure of affordable housing units is to be consistent with the recommendations of the Interim Affordable Housing Policy 2016, and following discussion between Applicant and Local Authority Planning Office.

3.3 ***Whether the affordable properties will be for rent and / or low cost home ownership***

It is proposed that the affordable units are sold onto a Housing Association of the Applicant / Site Owner's choice. The choice of whether the units are then rented or sold will be determined by the Association.

3.4 ***Size of each affordable dwelling (No of bedrooms)***

This is to be discussed and agreed between the Applicant, and the Local Authority Planning Department.

3.5 ***Type of dwelling (e.g. flat or house)***

It is proposed that the 4 No. dwellings are designated apartments within the scheme.

3.6 ***Affordable selling prices and / or rental levels***

It is proposed that affordable selling prices / rental levels are to be set by Housing Association

3.7 ***The scale of the proposed development is appropriate in relation to the size of the settlement. Development should be in keeping with the character of adjoining development and the locality, and with local traditional building styles***

The proposal would result in the creation of a quality development in a sustainable location. It is within close proximity of a range of community facilities and has good access to jobs and key services. The proposal would not have a detrimental impact on its surrounding characteristics. The proposal will also utilise existing services and utilities (such as water supply, electricity, drainage) within the area.

3.7 ***Arrangements for ensuring the future affordability, management and ownership of the housing***

It is proposed that this is to be dealt with by the Housing Association

3.8 ***Details of the timing of the construction and of the affordable housing element in relation to the development of the whole site***

Given the nature and position of the affordable housing, being integrated into (and indistinguishable from) the "parent" development; it is proposed that this is constructed alongside the other housing proposed for the site.

4.0 **Conclusion**

The proposed scheme satisfies Local and National Planning Policy with respect to the provision of affordable housing.