Consultation Response from KC Strategic Housing		
2019/92962 Field House, 15 Wellington Street, Dewsbury, WF13 1HF		
Application for: Listed Building Consent for conversion of former office building to 23 self-contained apartments, with A3 use at basement and part ground floor level, within a Conservation Area.		
Date Responded: 23/09/2019	**Responding Officer:** Ellie Selby	**Responding Ref:** SH/19/92962

Affordable housing policy:
The council seeks to secure 20% of dwellings on sites with 11 or more dwellings, for affordable housing. On-site provision (housing) is preferred, however where the council considers it appropriate, a financial contribution to be paid in lieu of on-site provision will be acceptable.

Ward: Dewsbury East
SHMA Market Area: Dewsbury and Mirfield
Kirklees Strategic Housing Market Assessment (SHMA) sub area context:
There is significant need for affordable 3+ bedroom homes in Dewsbury and Mirfield, along with 1/2 bed dwellings and 1/2 bedroom homes for older people specifically. Rates of home ownership are low at just under 65%, with 15% of homes rented privately and affordable housing constituting the remaining 20%. House prices in Dewsbury and Mirfield range from around £88,100 to £170,000 and lower quartile rent in the area is £394 per month.

Type: 1, 2 and 3+ bed housing

There is substantial demand for 3+ bedroom properties in Dewsbury and Mirfield. In addition, there is demand for 1/2 bed dwellings and accommodation for older people specifically.

Tenure:

In terms of affordable tenure split, across the district Kirklees works on a split of 55% social or affordable rent to 45% intermediate housing, but this can be flexible.

Affordable allocation for this development: 0 units are sought from this development

Following confirmation of whether or not Vacant Building Credit(VBC) applies(and to what extent), as well as the potential impact of development costs on any affordable housing allocation, there may be some financial contribution that could be sought in lieu of onsite affordable housing.

20% of dwellings (5 onsite dwellings) may have been sought were it not for the following factors:

• Vacant Building Credit may apply- the applicant would need to confirm details for this (see below for further detail on VBC).

• As noted in the planning pre app letter to the applicant, development costs/viability matters may impact on the ability to seek affordable housing.

• Though this does not apply to every flatted development (is considered by each particular development), it's unlikely that Registered Providers would seek a few apartments- particularly those proposed as relatively larger-sized apartments, for purchase.

- This is to be considered alongside the potential for VBC and/or development costs (viability) to affect the number of on-site affordable dwellings that could have been sought from this development.

Vacant building credit:

Pre app documents and advice state that Field House is a currently vacant former office building. Government guidance and policy set out in planning practice guidance and the National Planning Policy Framework, notes the following on vacant building credit:

'National policy provides an incentive for brownfield development on sites containing vacant buildings. Where a vacant building is brought back into any lawful use, or is demolished to be replaced by a new building, the developer should be offered a financial credit equivalent to the existing gross floor-space of relevant vacant buildings when calculating any affordable housing contribution which will be sought. Affordable housing contributions may be required for any increase in floor-space'.

- Planning practice guidance (Planning obligations)

'To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount- equivalent to the existing gross floor-space of the existing buildings. This does not apply to vacant buildings which have been abandoned'.

- National Planning Policy Framework.

If VBC applies, this would mean a reduction (partial or total) in the amount of affordable housing allocation. To calculate a vacant building credit, the applicant would need to confirm:

• That the existing building(s) were vacant at the time the application was submitted.

• The floor-space of the relevant existing vacant building(s), in square metres and confirmation of if it is partially or totally vacant.

• A schedule of accommodation /the residential floor-space of the proposed new development in square metres.

- For wholly residential schemes the total proposed Gross Internal Area (GIA) will be the GIA of all dwellings.
- Where flatted development is proposed the GIA will include all communal and circulation areas.
- For mixed use schemes, the GIA of the proposed residential elements only will be included.