Consultation Response from KC Strategic Housing		
2023/93667 at Storthes Hall Student Village, Storthes Hall Lane, Kirkburton, Huddersfield, HD8 0WA		
Outline application for demolition of buildings and erection of residential development (up to 261 dwellings), redevelopment of Lodge Cottage for residential use and associated works		
Date Responded: 25/01/2024	**Responding Officer:** DB	**Responding Ref:** SH/23/93667

Local planning policy for affordable housing is set out in the Kirklees Local Plan (adopted February 2019) under policy LP11 (Housing Mix and Affordable Housing). The Affordable Housing and Housing Mix SPD (adopted March 2023) provides detailed guidance and additional information to help implement Local Plan policy LP11 (Housing Mix and Affordable Housing).

Affordable Housing Contribution

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.

Affordable allocation for this development: for a development of 261 units, 20% of the units - 52 units, would be sought as on- site affordable housing.

Tenure: In terms of affordable tenure split, across the district Kirklees usually works on a split of 55% Social or Affordable Rent to 45% Intermediate housing. 25% of the affordable units (forming part of the Intermediate allocation) should be First Homes. The affordable housing tenure breakdown would be as follows:

55% Affordable Rent or Social Rent homes
20% Intermediate Affordable Homes (such as Shared Ownership)
25% First Homes

As noted in application documents Vacant Building credit may apply (to be confirmed by Planning) which would reduce the overall number of affordable units.

Due to the shortage of social rented properties across the district, Strategic Housing's preference is for social rented units over affordable rented units.

See definitions of social rent, affordable rent and intermediate at the end of this consultation response.

Housing Mix

Ward: Kirkburton
SHMA Market Area: Kirklees Rural East
Kirklees Strategic Housing Market Assessment (SHMA) sub area context: The Affordable Housing and Housing Supplementary Planning Document (SPD), adopted March 2023, sets out housing mix tables for each sub-area. The proposal falls within the Kirklees Rural East sub-area, so the following table applies based on local need.

Kirklees Rural East	Market Housing	Affordable Rent	Affordable Intermediate
1 and 2 bed	30-60%	60+%	40-79%
3 bed	25-45%	20-39%	40-59%
4+ bed	5-25%	0-19%	0-19%

The table above should usually be used as a starting point for developments with both market housing and affordable housing. It is acknowledged that there will be local circumstances, within the sub-areas, which could justify a different mix of housing to those set out in the SPD. Proposals that depart from the guidance set out in the SPD will need to provide evidence-based justification through the planning application process.

The applicant has proposed the following housing mix:

No. of Bedrooms	No. of Units	% of Housing Mix (261 units)
(43 1&2 beds (1 x 1bed , 42 x 2beds	43	16.48%
3 Bedrooms	112	42.91%
106 4&5 beds (89 x 4beds, 17 x 5beds)	106	40.61%

In line with the advised house type % ranges in the SPD, having more 1&2 beds (both market and affordable homes) and less 4beds would be advised, if possible.

Strategic Housing is available for further discussion with the applicant regarding details such as the house type mix, and vacant building credit.

Nomination Agreements

In accordance with the Council's Housing Allocations Policy, the Council seeks nomination agreements with Registered Providers in Kirklees for both social and affordable rented new build properties. There may be exceptions to this if they are negotiated at the development stage.

NDSS

The council desires that all developments meet the Government's Nationally Described Space Standards, which set out minimum requirements for internal gross floor area of new dwellings at a certain level of occupancy. The council recognises the nationally described space standards as best practice and will seek to ensure high quality living environments.

Design

The architecture of affordable homes should be indistinguishable from the standard of any such similar market housing that could be provided in the same development, in terms of the quality of materials and finishing, the architectural details, style, and space standards. The approach to external landscaping and on-plot car parking should also be indistinguishable.

Definitions of Affordable Housing

Affordable Housing - housing for sale or rent, for those whose needs are not met by the market as per Annex 2 of the NPPF. It is expected that most types of affordable homes (excluding Build to Rent ('Private Affordable Rent' homes- see below), those being social rent, affordable rent, and shared ownership, will be delivered in partnership with a Registered Provider (RP), who will own and manage these affordable homes. This is because RPs are regulated by Homes England and have satisfied the government's regulatory requirements for the provision and management of affordable housing.

Registered Providers – a registered provider of social housing such as a housing stock holding council, or a housing association, as defined in the Housing and Regeneration Act 2008 or any company or other body approved by the Homes England for receipt of social housing grant as may be proposed by the Owner and approved by the Council.

Social Rent – Social Rents are set using a government formula. This creates a 'formula rent' for each property, which is calculated in a way that takes account of the relative value of the property, the size of the property and relative local income levels. This is typically the most affordable form of rent, lower than Affordable Rent (see below) and market rents.

Affordable Rent - must comply with the following (i) rent which is no more than 80% of local market rent (inclusive of service charges where applicable), calculated using RICS approved valuation methods (ii) the landlord is a Registered Provider and iii) includes provision to remain affordable for future eligible households as defined in Annex 2 of the National Planning Policy Framework (or any future guidance or initiative that replaces or supplements it).

Intermediate Affordable Housing – Intermediate affordable housing is housing at prices and rents above those of social rent but below market price or rents, and which meet the criteria as set out in the definition for affordable housing. This can include equity loan products, intermediate rent, Shared Ownership, Rent to Buy, Discount Market Sale and First Homes. Starter Homes were previously included but this tenure has now been withdrawn by the Government and replaced by First Homes.

Vacant Building Credit

Government guidance and policy in planning practice guidance and the National Planning Policy Framework, notes the following on vacant building credit (VBC):

'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 could mean a reduction (partial or total) in the amount of affordable allocation (financial contribution). To calculate a vacant building credit, the applicant would need to confirm:
• That the existing building was 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 they are 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.