

Affordable Housing Scheme

Main Avenue, Cowlersley, Huddersfield

December 2024

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1.0 Introduction

- 1.1 This Affordable Housing Statement ("AHS") supports a Full Planning Application submitted to Kirklees Council ("KC") on behalf of Thirteen Housing Group ("the Applicants"), a Registered Housing Provider and Homes England Strategic Partner
- 1.2 The Application relates to land off Main Avenue, Cowlersley, Huddersfield ("the Site") and proposes residential development and associated access, landscaping and infrastructure.
- 1.3 This AHS considers and justifies the Applicants' approach to delivery of affordable homes at the Site and should be read alongside the Planning Report, prepared by IDP.
- 1.4 100% of the units in this scheme will be affordable homes and the viability of this scheme relies on Homes England grant being applied to all units.
- 1.5 Due to rules on additionality, Homes England grant cannot be applied to affordable housing provided by Registered Providers via a Section 106 Agreement.
- 1.6 This Statement is set out in three further chapters:
 - Section 2 summarises the relevant planning policy context and the scheme's compliance with it
 - Section 3 sets out the Applicant's affordable housing strategy
 - Section 4 sets out the proposed allocation criteria/process and management proposals for the units

2.0 Planning Policy Context

- 2.1 The Planning Report considers all local and national planning policies which are relevant to the determination of this Application.
- 2.2 It highlights, inter alia, that a key objective of the decision-making framework is to secure the delivery of an appropriate quantum and mix of new homes, including affordable homes.

National Planning Policy

- 2.3 The National Planning Policy Framework ("NPPF") requires local planning authorities to assess (and plan for) different groups in the community, including those who require affordable housing (Paragraph 63).
- 2.4 Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required and require this need to be met on-site unless off-site provision or an appropriate financial contribution in lieu can be robustly justified, and the agreed approach contributes to the objective of creating mixed and balanced communities (Paragraph 64).

Development Plan

Kirklees Local Plan February 2019

- 2.5 The Kirklees Local Plan "the Local Plan" was adopted on 27 February 2019. It comprises the strategy and policies document, allocations and designations document and associated policies map.
- 2.6 National planning policy states that the Local Plan should be based on evidence to allow objectively assessed needs for market and affordable housing to be met. The Kirklees SHMA considers need for affordable housing broken down by market sub-areas by assessing a variety of factors including the relationship between household incomes and house prices. It has identified that there is a substantial undersupply of affordable housing in Kirklees and that this need exists in all parts of the district.
- 2.7 Paragraph 8.38 of the Local Plan states that:

"Within market housing schemes, affordable housing will be sought on sites of more than 10 dwellings, in line with viability evidence. Smaller land parcels on one site developed incrementally will also need to provide affordable housing if the overall site capacity is more than 10 dwellings. A district-wide assessment of the economic viability of land for housing has shown that, for market housing schemes in Kirklees, 20% of the total units on sites should be provided as affordable housing. Negotiation will take place on individual planning applications if viability information is provided to show that the level of affordable homes required cannot be delivered."

- 2.8 Policy LP11 of the Local Plan sets out the Council's aspirations for housing mix and affordable housing.

Policy LP11

Housing Mix and Affordable Housing

All proposals for housing, including those affecting the existing housing stock, will be of high quality and design and contribute to creating mixed and balanced communities in line with the latest evidence of housing need.

All proposals for housing must aim to provide a mix (size and tenure) of housing suitable for different household types which reflect changes in household composition in Kirklees in the types of dwelling they provide, taking into account the latest evidence of the need for different types of housing. This includes consideration of provision for those with specialist needs. For schemes of more than 10 dwellings or those of 0.4ha or greater in size, the housing mix should reflect the proportions of households that require housing, achieving a mix of house size and tenure. The council encourages the inclusion of appropriate design elements that ensure buildings are suitable or can be adapted to meet the needs of people needing specialist accommodation at present and into later life. The council will encourage proposals for custom/self build homes where consistent with other policies in the Local Plan.

Taking into account the annual overall shortfall in affordable homes, the council will negotiate with developers for the inclusion of an element of affordable homes in planning applications for housing developments of more than 10 homes, including proposals involving self-contained residential units. The proportion of affordable homes should be 20% of the total units on market housing sites. The proportion may be less where viability evidence demonstrates that there are development costs which would otherwise prejudice the implementation of the proposal. Achievement of a higher proportion of affordable housing on sites will be encouraged.

The affordable homes should be incorporated within the development but where justified, a financial contribution of at least equal value may be accepted to provide affordable homes elsewhere or to re-use or improve the existing housing stock.

The affordable housing provision should:

- a. cater for the type of affordable need identified in the latest housing evidence in terms type, tenure, size and suitability to meet the needs of specific groups;
- b. incorporate appropriate arrangements to retain the benefits of affordability for initial and subsequent occupiers or for the subsidy to be recycled for alternative affordable housing provision; and
- c. be indistinguishable from market housing in terms of achieving the same high quality of design.

Exceptionally, planning permission may be granted for affordable homes on land which would not normally be permitted for housing development, where there is otherwise little prospect of meeting robustly evidenced local needs particularly for housing to rent by people who work locally. Where appropriate, such schemes must include arrangements for the homes to remain affordable in perpetuity.

Supplementary Planning Documents (SPDs)

Affordable Housing and Housing Mix SPD March 2023

- 2.9 KC has prepared a Supplementary Planning Document, adopted in March 2023, to provide additional guidance on implementing Local Plan Policy LP11.
- 2.10 The site falls within the Golcar ward which is within the Huddersfield North sub-area.

Huddersfield North	Market Housing	Affordable Rent	Affordable Intermediate
1 and 2 bed	30-60%	40-79%	60+%
3 bed	25-45%	0-19%	20-39%
4+ bed	10-30%	0-19%	0-19%

Table 9 Huddersfield North dwelling requirement (%) by number of bedrooms for Market Housing, Affordable Rent, and Affordable Intermediate tenure types

- 2.11 As the SPD had not yet been adopted during pre-application discussions Kirklees Council provided feedback on the local requirements for the proposed site based on previous data. This is discussed in more detail within Section 3 of this Statement.

Summary

- 2.12 A key objective of the decision-making framework is to secure the delivery of an appropriate quantum and mix of new homes, including affordable homes. There is, however, embedded recognition that not all developments will be able to viably support the delivery of affordable housing via Section 106 Agreements.

3.0 Affordable Homes

- 3.1 The dwellings to be delivered as affordable homes are as follows and are shown with the proposed tenure on the attached Affordable Housing Plan at Appendix 1:

Plot Number	Type	Sqft	Bed Spaces	Plot Number	Type	Sqft	Bed Spaces
1	HT9	1020.42	3B5P	31	HT6	784.69	2B3P
2	HT9	1020.42	3B5P	32	HT6	784.69	2B3P
3	HT7	877.26	2B4P	33	HT12	1032.26	3B5P
4	HT7	877.26	2B4P	34	HT12	1032.26	3B5P
5	HT7	877.26	2B4P	35	HT8	928.92	3B4P
6	HT7	877.26	2B4P	36	HT8	928.92	3B4P
7	HT12	1032.26	3B5P	37	HT24	1357.33	4B6P
8	HT12	1032.26	3B5P	38	HT24	1357.33	4B6P
9	HT12	1032.26	3B5P	39	HT24	1357.33	4B6P
10	HT12	1032.26	3B5P	40	HT24	1357.33	4B6P
11	HT8	928.92	3B4P	41	HT24	1357.33	4B6P
12	HT8	928.92	3B4P	42	HT24	1357.33	4B6P
13	HT8	928.92	3B4P	43	HT12	1032.26	3B5P
14	HT8	928.92	3B4P	44	HT12	1032.26	3B5P
15	HT11	1020.42	3B5P	45	HT8	928.92	3B4P
16	HT7	877.26	2B4P	46	HT8	928.92	3B4P
17	HT7	877.26	2B4P	47	HT9	1020.42	3B5P
18	HT7	877.26	2B4P	48	HT11	1020.42	3B5P
19	APT(G)	659.83	2B3P	49	HT6	784.69	2B3P
20	APT(1)	731.95	2B4P	50	HT6	784.69	2B3P
21	APT(G)	659.83	2B3P	51	HT6	784.69	2B3P
22	APT(1)	731.95	2B4P	52	HT14	1184.03	4B6P
23	APT(G)	659.83	2B3P	53	HT7	877.26	2B4P
24	APT(1)	731.95	2B4P	54	HT11	1020.42	3B5P
25	APT(G)	659.83	2B3P	55	HT10	1020.42	3B5P
26	APT(1)	731.95	2B4P	56	HT9	1020.42	3B5P
27	HT11	1020.42	3B5P	57	HT11	1020.42	3B5P
28	HT11	1020.42	3B5P				
29	HT6	784.69	2B3P				
30	HT6	784.69	2B3P				

- 3.2 The tenure of the dwellings will be as follows:

Type	Size	Beds	Tenure	Number
HT6	784.69	2	Rent	7
			SO	0
HT7	877.26	2	Rent	8
			SO	0

HT8	928.92	3	Rent	8
			SO	0
HT9	1020.42	3	Rent	3
			SO	1
HT10	1020.42	3	Rent	1
			SO	0
HT11	1020.42	3	Rent	5
			SO	1
HT12	1032.26	3	Rent	8
			SO	0
HT14	1184.03	4	Rent	1
			SO	0
HT24	1357.33	4	Rent	2
			SO	4
APT(G)	693.19	2	Rent	4
			SO	0
APT(1)	777.15	2	Rent	4
			SO	0
TOTAL		57	Rent	51
			SO	6

3.3 The below table shows the proposed mix of properties proposed:

Number of Bedrooms	Number of properties	Percentage
Affordable Rent		
1 bed	0	0%
2 bed	19	45%
3 bed	32	45%
4 bed	0	10%
Shared Ownership		
1 bed	0	0%
2 bed	0	0%
3 bed	4	67%
4 bed	2	33%
Total		
1 bed	0	0%
2 bed	23	40%
3 bed	27	48%
4 bed	7	12%

3.4 A pre-application submission was made to the Council in October 2021. At the time, the pre-application the proposed scheme was 49 units and therefore, advice was based on this figure. Feedback on the proposed scheme from Kirklees Council's housing officer was as follows.

"LP11 requires proposals to include 20% of units as affordable housing. For 49 dwellings, this would equate to 10 units."

- 3.5 The proposed scheme of 57 units now proposes 100% of the homes to be affordable therefore delivering over and above the policy requirement of 20% on the site.
- 3.6 In terms of mix the pre-app response advised:
- "You propose 7 x 2-bed houses, 12 x 2-bed apartments and 30 x 3-bed houses. **There is a significant need for affordable 3+ bed homes** and a lesser need for 1- and 2-bed properties. The affordable dwellings in this proposed development should be a balanced range of 2-bed and 3-bed properties which reflects this local need as well as a mix of houses and apartments."*
- 3.7 As set out in the table above the proposed housing mix complies with this requirement with the majority of homes being 3 bed or more (60%) and the remaining homes being a mix of 2 bed houses and apartments (40%).
- 3.8 In terms of tenure split the housing officer stated:
- "In terms of affordable tenure split, across the district Kirklees works on a split of 55% social or affordable rent to 45% intermediate housing. A mix of 6 social/affordable rent dwellings and 4 intermediate dwellings would be suitable. These numbers would, of course, increase with the required increase in the development's overall quantum."*
- 3.9 A policy compliant number of affordable homes on this scheme of 57 units would equate to 11 homes (20% of 57). 45% of the 11 affordable homes required via policy would equate to 5 shared ownership homes being required on the site. The proposal is for 6 shared ownership homes to be delivered and therefore this is considered to meet the policy requirement and the Housing Officer's request. The remainder of the affordable housing is to be provided as Affordable Rent which again meets policy requirements.
- 3.10 Notwithstanding the above, the pre-app advice of appropriate mix was provided on the premise of a standard residential development where only 20% of the homes are affordable. However, this development will be brought forward by a registered provider with the scheme being 100% affordable, as aforementioned. As such, following discussions with Planning Officers, the methodology to determine mix of tenure set out within the SPD is not reflective of a 100% affordable development and can in some instances create challenges in providing a policy compliant mix. Thus, as agreed with the LPA, the market housing mix column within the SPD is deemed a good rule of thumb as to what an appropriate housing mix should be.
- 3.11 As such, the SPD sets out that 1&2 bed should be 30-60%, 3 bed 25-45% and 4+ bed 10-30%. The proposals comprise of 40% 2 bed dwellings, 48% 3 bed and 12% 4 Bed. Therefore, the proposals are considered to broadly accord with the percentage requirements for housing mix set out within the SPD, albeit with a marginal over provision (by 3%) of 3 bed dwellings.

- 3.12 Nonetheless, the proposed housing mix has been devised following the advice provided within the pre-app, as well as research undertaken by Thirteen which indicates a strong demand for good quality family housing in the area, with 3 bed dwellings being beneficial to the wider housing stock of the area. As such, the marginal over provision of 3 bed dwellings is considered to be suitably justified in this case.
- 3.13 The tenure split has been informed through discussion with the Council's housing team, with consideration to viability and Thirteen's vast experience with delivering high quality housing that meets the housing needs of local people. Therefore, the proposed tenure split is considered to be acceptable, particularly when considering the requirements set out in policy.
- 3.14 In summary, it has been demonstrated that the proposals will provide over and above the policy requirement for affordable housing with a proposed mix that meets Kirklees Council's Housing Officer's requests and is considered to accord with the required housing mix.

4.0 Allocation and Management Arrangements

- 4.1 Thirteen will provide homes for rent and intermediate tenures to those in housing need.
- 4.2 Thirteen will allocate their homes in a fair, transparent and equitable manner, working together with Kirklees Council to support their strategic housing functions and sustainable communities and enable them to fulfil their statutory duties under the Housing Act 1996 and Homelessness Act 2002, as amended.
- 4.3 Thirteen will adhere to Kirklees Council's Housing Allocation Policy to advertise properties on the 'Choose and Move' system allowing people on the Housing Register to bid for the homes. Thirteen will also agree nomination rights with Kirklees Council.
- 4.4 Thirteen will own and be responsible for managing the rented properties in the scheme.
- 4.5 Thirteen propose to develop the 57 affordable housing units which shall remain affordable in perpetuity. The exceptions to this are listed as Permitted Disposals within the land Transfer between Kirklees Council and Thirteen Housing Group as listed below.
- 4.6 'Permitted Disposal' means a Disposal:
- to a statutory undertaker in connection with its statutory undertaking; or
 - to a highways authority to comply with highways requirements or in connection with the adoption or dedication of a public highway; or
 - to a utilities company for an electricity sub-station, gas governor, sewage or water pumping station, drainage balancing device or other similar matters for the provision of services; or
 - of a Constructed Dwelling involving a 100% staircasing permitted by the Model Lease and as required by Homes England as a condition of funding; or
 - of a Constructed Dwelling involving a statutory right to buy or right to acquire or right to shared ownership; or
 - of a Constructed Dwelling involving the first disposal of a shared ownership lease of 990 years in accordance with HE Grant requirements and as provided in the Model Lease; or
 - a rack rent lease for a term of 25 years or less.

Appendix 1 – Affordable Housing Plan

