Consultation Response from KC, Strategic Housing
2025/93470 Castle Hall, Lee Road, Ravensthorpe, Dewsbury, WF13 3BE
Change of use of existing care home (Use Class C2) to 11 self-contained residential flats (Use Class C3), including internal alterations
Date Responded: 09/03/2026 Responding Officer: KC Responding Ref: SH/25/93470

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: Based on a total of 11 units, a minimum of **2 units** would be sought as affordable housing.

Tenure: In terms of affordable tenure split, across the district Kirklees works on the split of:

- 55% Social/Affordable Rent
  - **Due to the high need for Social Rented Units Strategic Housing are requesting that Social Rented Units are provided for this tenure.**
- 45% Intermediate housing.

A minimum of 25% of the affordable homes must be First Homes – forming part of the intermediate allocation.

Example – *For a development of 100 units, a minimum of 20 of the units should be affordable homes. Of those 20 units, 11 homes (55%) would be social rent. 9 homes (45%) should be intermediate homes – 5 of which must be First Homes and the remaining 4 can be any form of intermediate tenure that the applicant wishes.*

For this development the proposal is requested to provide:

- **1 home for social rent**
- **1 home must be First Homes.**

At full application stage the applicant must be clear what the final tenure of the affordable homes will be, and show this on a plan detailing Affordable Housing Provision in accordance with https://www.kirklees.gov.uk/beta/planning-applications/pdf/validation-requirements-submission-of-planning-applications.pdf

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

Housing Mix

Ward: Dewsbury West
SHMA Market Area: Dewsbury and Mirfield
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 Dewsbury and Mirfield sub-area, so the following table applies based on local need.

	Market Housing	Affordable or Social Rent	Affordable Intermediate
1 and 2 bed	*30-60%*	*20-59%*	*0-39%*
3 bed	*25-45%*	*0-19%*	*40-59%*

4+ bed	*10-30%*	*20-39%*	*40-59%*

The table above should be used as a starting point for both market housing and affordable housing mix. 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 this SPD. Proposals which depart from the guidance set out in this SPD will need to provide evidence-based justification through the planning application process.

Type: Further detail on the housing mix for each tenure is required from the applicant.

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.

Discount Market Sale and First Homes are administered by the developer at the point of sale, with oversight and required approval by the council.

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 the affordable homes should be indistinguishable from the market housing 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 be indistinguishable from the market dwellings.

Definitions of Affordable Housing

It is expected that most types of affordable homes, 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 types of 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. Affordable housing in Build to Rent developments will be provided as Affordable Private Rent and will be managed by the same build to rent landlord as the market rented units.

Social Rent – must comply with the following (i) rent set in line with the Government's rent policy for social rented affordable housing and (ii) the landlord is Registered Provider.

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 an affordable price 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 Housing – housing at prices and rents above those of social rent but below market price or rents. This includes Shared Ownership, Rent to Buy, Discount Market Sale, First Homes or other shared equity and low-cost home ownership schemes. Previously included Starter Homes but this tenure has now been withdrawn by the Government and replaced by First Homes.

Build to Rent

Build to Rent is purpose-built housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses, but should be on the same site and/or contiguous with the main development. Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control.

Further details regarding Build to Rent can be found in the NPPF. If the applicant is proposing to deliver a Build to Rent scheme, please contact housing.regeneration@kirklees.gov.uk for further guidance.

Vacant Building Credit

Vacant building credit is national policy set out in the NPPG and 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 floorspace of the vacant buildings when the local planning authority calculates any affordable housing contribution. This will apply in calculating either the number of affordable housing units to be provided within the development or where an equivalent financial contribution is being provided.

Affordable housing contributions may be required for any increase in floorspace.

The Local Planning Authority (LPA) will determine on a case by case basis whether a building is vacant or abandoned. As a general principal to qualify for the vacant building credit a building should be vacant at the time a planning application is registered. The LPA will consider case law where a dispute arises about whether a building is abandoned rather than vacant. The credit is only applicable to relevant vacant buildings. The LPA will not accept, for example, sheds and non-permanent buildings as being relevant for the purposes of calculating a vacant building credit.

Further information on vacant building credit is set out in the NPPG.

Please note that where existing floorspace totals are deducted from the floorspace of the proposed residential development, floorspace that will be used for anything other than residential accommodation is not included.

If the applicant wishes to apply for Vacant Building Credit, please contact housing.regeneration@kirklees.gov.uk to find out what further evidence is required.