

Consultation Response from KC Strategic Housing

Land at, former Clough Mill, Clough Road, Slaithwaite, Huddersfield, HD7 5DB

2025/93543 - erection of 33 dwellings (c3) with access from Clough Road and associated works including engineering operations, construction of retaining walls and landscaping

Date Responded: 01/04/2026

Responding Officer: DB

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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 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 33 units, a minimum of **7 units (20%)** would be sought as affordable housing.

The applicant has proposed the following: 'The Affordable Homes are proposed for affordable rental and will be managed and run via S B Homes rental company; up to 80% of the open market rent and to qualifying people.'

If the applicant is not providing affordable housing that would be purchased and operated by a Registered Provider, and they would retain ownership of the affordable homes that are let for rent, this is [Build to Rent](#) housing. 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. Affordable housing in Build to Rent developments is provided as 'affordable private rent' units, at a minimum 20% discount, and is managed by the build to rent owner/operator.

'The process for managing affordable private rent units should also be set out in the section 106 agreement. This should set out the parameters of the lettings agreement, the rent levels, apportionment of the homes across the development, a management and service agreement, and a marketing agreement setting out how their availability is to be publicised.

The section 106 should also require build to rent scheme operators to produce an annual statement to authorities, confirming the approach to letting the affordable units, their ongoing status, and clearly identifying how the scheme is meeting the overall affordable housing level required in the planning permission'.- Planning Practice Guidance

The proposed affordable housing units are all be in an apartment building, which distinguishes the affordable housing from the market housing, which are houses.

As set out below, a range of affordable housing types are needed in the area. The applicant providing a mix of house types for the affordable housing, including houses and flats of different sizes, would be preferable.

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

- 55% Social Rent or Affordable Rent and 55% Intermediate affordable housing.
 - **Due to the high need for Social Rented Units Strategic Housing are requesting that Social Rented Units are provided.**

A minimum of 25% of the affordable homes should be First Homes as advised in the Affordable Housing and Housing Mix SPD - forming part of the intermediate allocation.

Example - For a development of 100 units, a minimum of 20 (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(25%) and the remaining 4(20%) can be any form of intermediate tenure that the applicant wishes.

For this development- advised affordable housing provision would be as follows:

- 4 social rent 'private affordable rent' homes, managed as Build to Rent properties
- 3 homes intermediate affordable dwellings.
- Of the 3 intermediate dwellings:
- 2 homes must be [First Homes](#)
- 1 homes can be any form of intermediate tenure that the applicant decides, including First Homes or Discount Market Sale.

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

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>

Housing Mix

Ward: Colne Valley

SHMA Market Area: Kirklees Rural West

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 West sub-area, so the following table applies based on local need.

<i>Kirklees Rural West</i>	Market Housing	Affordable Rent	Affordable Intermediate
1 and 2 bed	30-60%	20+%	20-59%
3 bed	25-45%	0-19%	60+%
4+ bed	10-30%	0-19%	0-19%

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.

Applicant tenure and house type proposal:

	Market Housing	Affordable Rent Housing
1 bed flat	0	100% 1-2 bed units
2 bed flat	8 units (31%)	
3 bed house	14 units (54%)	0
4 bed house	4 units (15%)	0

Strategic Housing advises a mix of affordable housetypes - including that some 3 bed houses form part of the affordable housing provision where possible, more in line with the above advised SPD housing mix for Kirklees Rural West.

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 rent set in line with the Government's rent policy for social rented affordable housing.

Affordable Rent - rent which is no more than 80% of local market rent (inclusive of service charges where applicable).

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.

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

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 National Planning Policy Framework (NPPF) and Planning Practice Guidance. If the applicant is proposing to deliver a Build to Rent scheme, please contact housing.regeneration@kirklees.gov.uk for further guidance.

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 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.

The layout of affordable dwellings should be dispersed throughout the site in smaller clusters, avoiding large groupings of affordable dwellings together that may reinforce social exclusion. Affordable dwellings should be well integrated within the site layout and not located at specific areas at the edges of sites.