

To: All Members of the EXECUTIVE

When calling please ask for:

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Date: 24 February 2023

Membership of the Executive

Cllr Paul Follows (Chair)
Cllr Peter Clark (Vice Chair)
Cllr Andy MacLeod
Cllr Penny Marriott
Cllr Mark Merryweather

Cllr Kika Mirylees
Cllr Nick Palmer
Cllr Paul Rivers
Cllr Liz Townsend
Cllr Steve Williams

Dear Councillors

A meeting of the EXECUTIVE will be held as follows:

DATE: TUESDAY, 7 MARCH 2023

TIME: 6.00 PM

PLACE: COUNCIL CHAMBER, COUNCIL OFFICES, THE BURYS,
GODALMING

The Agenda for the Meeting is set out below.

Yours sincerely

STEPHEN RIX

Executive Head of Legal & Democratic Services (Interim) & Monitoring Officer

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NOTES FOR MEMBERS

Contact Officers are shown at the end of each report and members are welcome to raise questions, make observations etc. in advance of the meeting with the appropriate officer.

Prior to the commencement of the meeting, the Leader, Deputy Leader or an appropriate Portfolio Holder to respond to any informal questions from members of the public, for a maximum of 15 minutes.

[Questions will be taken in the order in which questioners register with the Democratic Services Officer prior to the start of question time. When read out, each question must be concluded within 2 minutes. In the event that it is not possible to give a verbal response, a written response will be provided following the meeting.]

AGENDA

1. **APOLOGIES FOR ABSENCE**

To receive apologies for absence.

2. **MINUTES**

To confirm the Minutes of the Meeting held on 7 February 2023..

3. **DECLARATIONS OF INTERESTS**

To receive from members, declarations of interest in relation to any items included on the agenda for this meeting, in accordance with the Waverley Code of Local Government Conduct.

4. **QUESTIONS FROM MEMBERS OF THE PUBLIC**

The Chairman to respond to any questions received from members of the public for which notice has been given in accordance with Procedure Rule 10.

The deadline for receipt of questions is 5pm on Tuesday 28 February 2023.

5. **QUESTIONS FROM MEMBERS OF THE COUNCIL**

The Chairman to respond to any questions received from Members in accordance with Procedure Rule 11.

The deadline for receipt of questions is 5pm on Tuesday 28 February 2023.

6. LEADER'S AND PORTFOLIO HOLDERS' UPDATES

7. RECOMMENDATIONS FROM THE OVERVIEW AND SCRUTINY COMMITTEES

An Extraordinary meeting of the Overview & Scrutiny Committee – Resources was held on Monday 20 February 2023 to consider the proposals for the Ockford Ridge Refurbishment Phase 4.

The observations and recommendations of the Overview & Scrutiny Committee – Resources are set out in the report at agenda item 8 and will be addressed as part of the consideration of that report.

8. OCKFORD RIDGE REFURBISHMENT PHASE 4 - DEEP RETROFIT - GREEN TECHNOLOGY PILOT (Pages 7 - 46)

[Portfolio Holder: Portfolio Holder for Housing (Delivery)]

Purpose and summary of the report:

- To update members on the progress made with delivery of the pilot project to deep retrofit seven properties at Ockford Ridge. A pilot project that will contribute to the Council's environmental and sustainability objectives and aim to become a net zero-carbon council by 2030 through the delivery of affordable homes which are more sustainable and energy efficient than they are at present. At the same time improving quality of life and reduce fuel poverty for future tenants by using renewable energy sources (air source heat pump / photovoltaic cells (PV's)) and reducing the overall heat demand through the provision of additional external wall and internal floor and roof insulation and modern A+ rated double glazed windows. Electric vehicle charging points will be installed where the properties have off street parking.
- Advise members on:
 - the outcome of the procurement process to identify a build contractor
 - background to the request for additional budget to complete the proposed pilot and
 - options considered to reduce the costs
- Seek Executive approval to enter into contract to deliver the pilot project.

Recommendation

The Executive, after considering the report and annexes and comments of the O&S Resources Committee as detailed in the Consultation and Engagement section of this report,

1. **Recommend to Full Council that an additional budget allocation of £784,000 is agreed for Phase 4 of the Ockford Ridge Regeneration Project, bringing the total allocated budget to £1.765m, to enable the deep retrofit of seven homes, piloting the use of green**

renewable energy sources and enhanced fabric, to proceed according to the previously approved specification as detailed in Exempt Annexes 1 – 4; and

- 2. Subject to the agreement of Full Council of the additional budget allocation, approves:**
 - i. Entering into a contract with the preferred contractor for the delivery of the works;**
 - ii. Entering into any related contractual documentation (including collateral warranties or agreements) relating to the project; and**
 - iii. Giving delegated authority to the Executive Head of Legal and Democratic Services to approve the final form of legal agreements.**

9. **AFFORDABLE HOUSING SUPPLEMENTARY PLANNING DOCUMENT**
(Pages 47 - 160)

[Portfolio Holder: Portfolio Holder for Housing (Delivery), Portfolio Holder for Planning and Economic Development]

The purpose of this report is to seek the Executive's approval for the updated Affordable Housing Supplementary Planning Document (SPD) to be recommended to Full Council for formal adoption as a material planning consideration.

Recommendation

It is recommended that the Executive recommends to Full Council that the updated Affordable Housing Supplementary Planning Document be adopted.

10. **DRAFT UPDATED AIR QUALITY ACTION PLAN AND DRAFT CLEAN AIR STRATEGY FOR WAVERLEY** (Pages 161 - 248)

[Portfolio Holder: Portfolio Holder for Environment and Sustainability]

To review feedback from the public consultation and consider the draft updated Air Quality Action Plan (AQAP) February 2023 for the Air Quality Management Areas (AQMAs) and draft Clean Air Strategy for Waverley (CAS) February 2023.

To seek approval of the draft updated Air Quality Action Plan (AQAP) February 2023 and draft Clean Air Strategy for Waverley (CAS) February 2023, prior to submitting the AQAP to Defra for approval.

Recommendation

It is recommended that the Executive note the feedback from the public consultation, and recommend that Council adopt the draft updated AQAP February 2023 and draft CAS February 2023, which align with the Climate Change and Sustainability Strategy (CCSS), the Carbon Neutrality Action Plan (CNAP) and the work underway on the Farnham Infrastructure Plan (FIP).

11. COMMUNITY INFRASTRUCTURE LEVY (CIL) BIDDING CYCLE 2022/23
(Pages 249 - 262)

[Portfolio Holder: Portfolio Holder for Housing (Delivery)]

As per the approved CIL governance arrangements, the Executive is delegated to approve bids for the allocation of Strategic CIL Funding, on the recommendation of the CIL Advisory Board, subject to an upper limit of £2.5m per individual award, above which approval reverts to Full Council.

This report seeks approval from the Executive for the allocation of Strategic CIL funding to the projects recommended for funding by the CIL Advisory Board in relation to the Strategic CIL Bidding Cycle 2022/23.

Recommendation

- 1) It is recommended that the Executive agree the recommendations of the CIL Advisory Board and approve the allocation of Strategic CIL funding to the projects as set out in this report. This is subject to the completion of the final relevant checks and the signing of funding agreements, the details of which are delegated to the Strategic Director in consultation with the Portfolio Holder for Housing (Delivery).
- 2) It is recommended that the Executive agree the recommendation of the CIL Advisory Board to remove the 'Community CIL' from future Strategic CIL Bidding Cycles, for the reasons as set out within this report.

12. REQUEST FOR SUPPLEMENTARY ESTIMATE - DEVELOPMENT MANAGEMENT (Pages 263 - 268)

[Portfolio Holder: Portfolio Holder for Planning and Economic Development]

The purpose of this report is to seek approval for a supplementary estimate to cover the costs associated with various pending and upcoming appeals and to further fund legislation required advertising costs. The report sets out that the Service does not have sufficient budget to meet the costs being claimed.

Recommendation

It is recommended that the Executive approves a supplementary estimate totalling £97,990 for the following costs:

- £15,000 for planning application advertising fee overspend (statutory requirement) and
- £82,990 for pending and forthcoming appeals costs.

13. CRANLEIGH LEISURE CENTRE - NEW BUILD TENDER (Pages 269 - 274)

[Portfolio Holder: Portfolio Holder for Planning and Economic Development]

This report provides an update on the current position of the Cranleigh Leisure Centre new build project and presents recommendations for approval to award

contracts for the design team (as specified in 3.6) following completion of the procurement process.

Recommendation

It is recommended the Executive:

1. Approve the award of contracts to the design team and other professional services required to reach RIBA stage 5, following completion of the procurement processes; and

2. Delegate authority to the Strategic Director for Transformation & Governance to complete all required contractual documentation and approve execution of the contract documentation.

14. EXCLUSION OF PRESS AND PUBLIC

To consider the following recommendation on the motion of the Chairman:-

Recommendation

That, pursuant to Procedure Rule 20, and in accordance with Section 100A(4) of the Local Government Act 1972, the press and public be excluded from the meeting during consideration of the following item(s) on the grounds that it is likely, in view of the nature of the business to be transacted or the nature of the proceedings, that if members of the public were present during these items, there would be disclosure to them of exempt information (as defined by Section 100I of the Act) of the description specified at the meeting in the revised Part 1 of Schedule 12A to the Local Government Act 1972.

15. ANY OTHER ISSUES TO BE CONSIDERED IN EXEMPT SESSION

To consider matters (if any) relating to aspects of any reports on this agenda which, it is felt, may need to be considered in Exempt session.

**For further information or assistance, please telephone
Fiona Cameron, Interim Democratic Services Manager, on 01483
523226 or by email at fiona.cameron@waverley.gov.uk**

WAVERLEY BOROUGH COUNCIL

OVERVIEW & SCRUTINY COMMITTEE – RESOURCES – 20 FEBRUARY 2023

EXECUTIVE – 7 MARCH 2023

COUNCIL – 21 MARCH 2023

Title:

**Ockford Ridge Refurbishment Phase 4
Deep Retrofit - Green Technology Pilot**

Portfolio Holder: Cllr Paul Rivers, Portfolio Holder for Housing (Operations)

Head of Service: Andrew Smith, Executive Head of Housing

Key decision: Yes

Access: Part Exempt – Report Open / Annexes Exempt

Note pursuant to Section 100B(5) of the Local Government Act 1972

Annexes to this report contain exempt information by virtue of which the public is likely to be excluded during the item to which the report relates, as specified in Paragraph 3 of Part I of Schedule 12A to the Local Government Act 1972, namely:

Information relating to the financial or business affairs of any particular person (including the authority holding that information).

1. Purpose and summary

1.1 Purpose and summary of the report.

- To update members on the progress made with delivery of the pilot project to deep retrofit seven properties at Ockford Ridge. A pilot project that will contribute to the Council's environmental and sustainability objectives and aim to become a net zero-carbon council by 2030 through the delivery of affordable homes which are more sustainable and energy efficient than they are at present. At the same time improving quality of life and reduce fuel poverty for future tenants by using renewable energy sources (air source heat pump / photovoltaic cells (PV's)) and reducing the overall heat demand through the provision of additional external wall and internal floor and roof insulation and modern A+ rated double glazed windows. Electric vehicle charging points will be installed where the properties have off street parking.
- Advise members on:
 - the outcome of the procurement process to identify a build contractor
 - background to the request for additional budget to complete the proposed pilot and
 - options considered to reduce the costs
- Seek Executive approval to enter into contract to deliver the pilot project.

2. **Recommendation**

The Executive, after considering the report and annexes and comments of the O&S Resources Committee as detailed in the Consultation and Engagement section of this report.

1. Recommend to Full Council that an additional budget allocation of £784,000 is agreed for Phase 4 of the Ockford Ridge Regeneration Project, bringing the total allocated budget to £1.765m, to enable the deep retrofit of seven homes, piloting the use of green renewable energy sources and enhanced fabric, to proceed according to the previously approved specification as detailed in Exempt Annexes 1 – 4; and
2. Subject to the agreement of Full Council of the additional budget allocation, approves:
 - i. Entering into a contract with the preferred contractor for the delivery of the works;
 - ii. Entering into any related contractual documentation (including collateral warranties or agreements) relating to the project; and
 - iii. Giving delegated authority to the Executive Head of Legal and Democratic Services to approve the final form of legal agreements.

3. **Reason for the recommendation**

- 3.1 The Council has already committed to the delivery of the regeneration of the Ockford Ridge estate which includes both regeneration and refurbishment of homes. To date, three phases of refurbishment have been completed and a budget of £981,000 was approved at full Council in February 2022 to deliver this next phase.

The project will deliver modern, safe, and secure, sustainable homes and support delivery of the Council's [Corporate Strategy 2020 – 2025](#), [Climate Change and Sustainability Strategy 2020 - 2030](#), [Carbon Neutrality Action Plan 2020 - 2030](#) and [Housing Asset Management Strategy 2022-2030](#) commitments and targets.

The Housing Asset Management Strategy sets out that the Council will take a 'Fabric First' approach when investing in our properties to reach a carbon neutral position which aligns with the Social Housing Decarbonisation Fund principles. However, to reach a carbon neutral position it highlights that more complex measures may be required including a whole house retrofit strategy, potentially following the principles of PAS 2035 (PAS, performance advisory specification to be implemented by 2035) which is a British quality standard for the retrofit and energy efficiency sector for housing.

The next phase of retrofit at Ockford Ridge provides the opportunity to implement a pilot which takes the whole house retrofit approach with an enhanced fabric using external and floor insulation and replacement of the use of fossil fuels with green renewable energy sources and technology. This will enable the Council to:

- demonstrate its commitment to its Climate Emergency declaration and how it can retrofit its homes to ensure their energy performance is fit for a carbon-neutral energy system

- demonstrate its intent to invest in our housing stock and how much implementing the commitment costs, informing the details required as part of the Council's call to government to provide long term funding solutions to support delivery of local and national climate targets
- take a 'learning through doing' approach which with monitoring, evaluation, and documentation, will provide an enhanced understanding of the whole house retrofit process and identify areas of cost reduction, replicability, and scalability to potentially develop larger-scale programmes
- develop handover advice and training on the upgrade of fabric envelop and systems that ensure efficient interaction and operation of the property
- undertake post retrofit insitu measurement and monitoring of the performance of the property and post occupancy evaluation
- use the pilot and lessons learnt to assist when bidding for future funding programmes
- maximise the potential and value of a Council owned asset and proactively decarbonise homes.

4. Relationship to the Corporate Strategy & Service Plan

4.1 Affordable housing is central to community wellbeing. The actions within the Housing Service Action Plan are consistent with the Council's Corporate Strategy 2020-2025 and strategic priorities to deliver 'good quality housing for all income levels and age groups', 'a sense of responsibility for all of our environment, promoting biodiversity, championing the green economy and protecting our planet', 'effective strategic planning and development management to meet the needs of our communities.'

The project aims to provide seven (6 x 2b 4p / 1 x 3b 5p) modern, energy efficient, and affordable homes; six will be available for those that are in housing need and registered on the Council's housing register and one tenant will return to a refurbished home.

5.1 Resource

Finance

Drafted by: Candice Keet, Senior Accountant

The delivery of seven refurbished homes would be funded through the Major Repairs Reserve. The Council approved budget for Ockford Ridge refurbishment for 2022/23 is £981,000.

The total required for these works now totals £1,765,000. There is therefore a budget shortfall of £784,000.

The Major Repairs Reserve has sufficient balances to cover this additional spend, with a balance of £1.7m. The Major Repairs Reserve is used to fund capital spend on our current dwelling stock and is monitored regularly to ensure balances are sufficient.

Procurement has been undertaken in compliance with the Council's Financial Regulations and Contract Procedure Rules.

As advised above the budget for the project was agreed at full Council in February last year however inflationary pressures and construction cost uplift have impacted on the value for the works costs in the tenders received and additional budget is required to deliver the pilot. Further details including details of the procurement, tender, the Tender Evaluation Report and Appendices, and review of cost estimates can be found at Exempt Annexe 1, 2 and 3.

In consideration of the increase in these costs officers have obtained advice from the Councils consultant employers agent, quantity surveyor and mechanical and electrical consultants on alternative options which have been costed and can be found at Exempt Annexe 4

5.2 Risk management

Risk will be managed in accordance with the Council Risk Management Framework with consideration of the Council's Risk Appetite Statement and risk domains.

The existing Ockford Ridge Regeneration Project risk register will be reviewed as part of the ongoing project management and governance of this project.

5.3 Legal

Drafted by: Ian Hunt, Interim Deputy Borough Solicitor

The Council's Legal Services team has already been fully involved with the process linked to the delivery of both the new build and refurbishment projects at Ockford Ridge. Internal and external specialist legal advice has been sought regarding procurement and contract documentation and this will continue as and when required.

5.4 Equality, diversity, and inclusion

There are no direct equality, diversity, or inclusion implications in this report. Equality impact assessments are carried out, when necessary, across the council to ensure service delivery meets the requirements of the Public Sector Equality Duty under the Equality Act 2010.

5.5 Climate emergency declaration

The deep retrofit pilot project will contribute to the Council's environmental and sustainability objectives and aim to become a net zero-carbon council by 2030 through the delivery of affordable homes which are more sustainable and energy efficient than they are at present.

Design / retrofit

Work has been undertaken with surveyors, mechanical, electrical and sustainability consultants to design, and deliver more sustainable and energy efficient homes and identify carbon off-set opportunities in the materials used for the retrofit.

The use of contractor shortlisting / tender process supports the Council's ambition of being carbon neutral by 2030.

The most economically advantageous tender criteria will be used to enable the Council to take account of the qualitative, technical, and sustainability aspects of the tender as well as price when evaluating and reaching a contract award decision. This included an assessment of responses in relation to minimizing carbon impact on the delivery of this retrofit project with specific references to addressing the environmental impact, through all phases of delivery and management of their supply chain.

Contractors are required to demonstrate areas of innovation that they have developed, or products used and how any contractor work with the council, having regard to the Council's current Employers Requirements.

6. Consultation and engagement

The Resources Overview and Scrutiny Committee scrutinised this report, Ockford Ridge Refurbishment Phase 4 Deep Retrofit – Green Technology Pilot report on 20 February 2023 and made the following recommendations to the Executive:

1. In relation to the data regarding the energy performance of the homes, the Committee wishes to ensure the Council's entitlement to the performance data which may necessitate an agreement be entered into with the tenant. Also, that our tenants will be supported in understanding how to make optimal use of the equipment, undertake maintenance required and otherwise engage with us to ensure we get maximum value for both tenants and the Council.
2. The title of the project is changed to make clear that the majority of the cost (70%) relates to a high-quality refurbishment project with retrofit of green technology as the minority cost (30%).
3. All opportunities for grants be sought on the basis that this is a learning opportunity, and opportunities for shared learning should also be explored.
4. An indication of expected annual CO₂ savings (i.e., current CO₂ output from equivalent dwellings minus expected CO₂ output from the refurbished dwelling (recognising the CO₂ footprint of grid electricity used to power the heat pump)) should be included as well as the expected payback period in years (i.e. the CO₂ emitted in the refurbishment exercise divided by the expected annual CO₂ savings).
5. Greater clarity is needed regarding how much of the cost is for the refurbishment (as opposed to the new technology) and how these refurbishment costs compare with previous refurbishment phases 1 and 3.

In addition, the Committee expressed its concern that only two tender responses were received, of which only one was considered suitable, which casts doubt on the ability to find contractors to scale up this project should funds be available to do so.

7. Options considered

Do nothing

If no action were taken, we would fail to use our existing assets to their fullest potential and relet properties at a void standard (with kitchen and bathroom replacement) without making use of the opportunity to improve their energy efficiency and internal configuration (e.g., moving the bathroom upstairs to deliver a kitchen breakfast room etc). We would not be fulfilling our aim to regenerate Ockford Ridge through new build and refurbishment or address several the Council's commitments and targets. Due to investigatory work to inform the tender pack there has been some disturbance to the internal fabric of the be properties which would require rectification ahead of relet. It is estimated that this work would cost £15k per property including provision of new kitchen and bathroom. Following this the homes would continue to be maintained through the programme works delivered by Property Services and appointed contractors.

Dispose of seven Council homes

Disposal of the seven council owned properties would reduce the ability of the Council to meet local housing need and the cost of the replacement of these assets would exceed the budget request for delivery of the deep retrofit – green technology pilot.

Regeneration – Demolition & new build

Only two of these properties are adjacent to each other, the other homes are either one of a pair of semi-detached homes or part of a terrace where the other homes are privately owned. This option would require the acquisition of property and due to the pepper potted nature of their locations would not be viable to deliver a significant net gain.

Refurbishment - Deep retrofit – Green Technology Pilot

This option is considered the preferred option as a commitment has already been made to refurbish homes that are owned by the Council and are not part of a site for regeneration at Ockford Ridge and budget has been approved. Previous phases of refurbishment have been undertaken where homes have been reconfigured, new heating (gas boilers), electrics, kitchens and bathrooms, and increased insulation in the loft space. However, this option considers that the retrofit is taken further to contribute to the Council's aim of becoming a net-zero carbon council by 2030 and reducing fuel poverty by removal of the use of fossil fuel gas boilers and replacement with the use of green technology, air source heat pumps and photovoltaic cells. The fabric efficiency of the building will also be enhanced from the outside using external insulation for example KRender, roof and floor insulation and new A+ rated double glazing with a higher energy performance (conduction heat loss, solar heat gain, and a heat loss through air filtration).

The external insulation system used will consist of several material layers which include insulation material and external render finish which will have limited contribution to fire.

Whilst the property will have improved airtightness when works have been completed, assessments will be undertaken to ensure that adequate ventilation,

either natural or mechanical is in place to mitigate against the risk of mould formation. Contractors will need to comply with all current Building Regulation Approved Document requirements associated with retrofit works and Waverley Building Control will be appointed to ensure compliance.

The appointed contractors and consultants will work with the Council's Housing Development Team to deliver homes that use green technology and enhanced fabric efficiency with the aim to achieve an EPC (Energy Performance Certificate) A or near A rating from a current EPC D rating for existing stock.

To support and evidence the success of this option the following information can be obtained.

- EPC assessment of existing property, based on drawings and specification and at the point of completion
- Data on energy and water usage
- Sample reports on thermography
- Airtightness test
- Carbon reduction assessment
- Post retrofit insitu measurement and monitoring using for example Switchee (in accordance with privacy policy associated with use of equipment and information obtained)
- Post occupancy interviews prior to the end of the defects period

The investment through this deep retrofit option will remove the cost of standard void works at relet, reduce the potential level of responsive repairs and the required programmed works on these homes in the medium term.

Appointed contractors will be required to contribute to the Community Benefit Programme for example mentoring via SATRO at Rodborough School, investment in The Green / Gardening Club or contributing to the delivery of improvements to The Green.

All properties are currently void and surveys with resulting reports and drawings used to secure planning permission and preparation of the tender pack.

Stakeholder engagement would continue through the Ockford Ridge Liaison Group (which includes council officers, Ward Members, and a local resident / Tenants Panel representative), project governance board Ockford Ridge Programme Board, and Housing Delivery Board.

All properties are currently void and surveys with resulting reports and drawings used to secure planning permission and preparation of the tender pack.

Stakeholder engagement would continue through the Ockford Ridge Liaison Group (which includes council officers, Ward Members, and a local resident / Tenants Panel representative), project governance board Ockford Ridge Programme Board, and Housing Delivery Board.

9. Governance journey

A project governance board Ockford Ridge Programme Board is made up of key officers from Housing, Finance, Legal services, Communications, Strategic Director and Executive Head of Regeneration and Planning Policy provide strategic oversight and direction. This governance board reports to the Housing Delivery Board which met on 8 December and members received a verbal update on the progress of this project, procurement outcome and requirement to seek additional budget to facilitate delivery.

Exempt Annexes:

Annexe 1 – Ockford Ridge Refurbishment Phase 4 (Deep Retrofit – Green Technology Pilot) Summary – Procurement & budget

Annexe 2 – Tender Evaluation Report and Appendices A1 & A2

Annexe 3 – Ockford Ridge Refurbishment Phase 4 – Cost estimates Jan 22 / 23

Annexe 4 - Ockford Ridge Refurbishment Phase 4 – Costed options summary.

Background Papers

There are / are no background papers, as defined by Section 100D(5) of the Local Government Act 1972).

CONTACT OFFICER:

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Position: Housing Development Manager
Telephone: 0148 3523205
Email: louisa.blundell@waverley.gov.uk

Agreed and signed off by:

Legal Services: Ian Hunt

Finance: Candice Keet

Strategic Director: Annie Righton

Portfolio Holder Housing (Operations): Councillor Rivers

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
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WAVERLEY BOROUGH COUNCIL

EXECUTIVE - 7 MARCH 2023

COUNCIL - 21 MARCH 2023

Title:

**Affordable Homes Supplementary Planning Document (SPD) Update-
Adoption**

Portfolio Holders: Cllr Nick Palmer, Co-Portfolio Holder for Housing (Delivery)
Cllr Liz Townsend, Portfolio Holder for Planning and Economic
Development

Head of Service: Abi Lewis, Executive Head of Regeneration and Planning Policy
Gilian MacInnes, Interim Executive Head of Planning
Andrew Smith, Executive Head of Housing Services

Key decision: Yes

Access: Public

1. Purpose and summary

The purpose of this report is to seek the Executive's approval for the updated Affordable Housing Supplementary Planning Document (SPD) to be recommended to Full Council for formal adoption as a material planning consideration.

2. Recommendation

It is recommended that the Executive recommends to Full Council that the updated Affordable Housing Supplementary Planning Document be adopted.

3. Reason for the recommendation

The SPD provides further guidance on the implementation of Local Plan Part 1 (LPP1) policies relevant to affordable housing and will become a material planning consideration. It will support a transparent and efficient planning process and will ensure consistent and fair decision-making.

This recommendation follows a statutory public consultation on the SPD undertaken in accordance with Regulation 13 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (“the Regulations”). The final SPD attached at Annexe 1 has been amended in response to comments raised through the public consultation.

4. Background

4.1 The Waverley Borough Council [Local Plan Part 1](#); Strategic Policies and Sites (LPP1) was adopted by the Council on 20 February 2018 and contains strategic planning policies on affordable housing. LPP1 requires us to have an Affordable Housing SPD to include details of the approach to calculating financial contributions; up to date information on the type and size of affordable housing required; the cascade mechanism to be applied to cases where viability is an issue and other matters of detail interpretation/ application of the policies. The SPD therefore covers LPP1 Policies AHN1; Affordable Housing on Development Sites and AHN2; Rural Exception Sites. The purposed of the SPD is to provide further detail and guidance on existing LPP1 policies, as SPDs do not form part of the development plan and therefore cannot introduce new planning policies.

4.2 The current Affordable Housing SPD was adopted in April 2021. Its purpose is to provide clarity to developers, affordable housing providers, Development Management officers, stakeholders and local residents on our affordable housing requirements. An update is now required to take into account changes in national policy and to reflect the commitment to lower rents in our adopted Affordable Homes Delivery Strategy (April 2022).

5. Public Consultation on the draft SPD

In accordance with the requirement in the regulations to undertake a four-week public consultation, a consultation was held between 17.10.22 and 28.11.22. In total, 29 responses were received from a range of stakeholders including: statutory consultees, Parish Councils, local residents, affordable housing providers, developers and other interested parties.

The Consultation Statement attached at Annexe 2 details the comments received and the response to these. Where appropriate and deemed necessary, changes have been made to the SPD to address the comments received. Responses were generally supportive and areas where clarification was needed have been addressed (see table below).

6. Changes to SPD following consultation

Changes to the Affordable Housing Supplementary Planning Document made a result of consultation responses are summarised in the table below and highlighted in the document:

PROPOSED CHANGE TO THE AH SPD	PARA	PAGE
Clarification on recommendations regarding affordable tenure split	53	23

Definition of rents in the s106 to make clear that an annual rent increase in line with Homes England guidance is permitted, for the avoidance of doubt.	60	24
Inserted “unless a waiver is agreed by Homes England”	65	25
References to shares from 25% amended to 10%. References to Help to Buy Agent removed.	67	26
Size specifications for rented housing cross-referenced with Waverley Housing Allocation Scheme	77	27
Applications amending or reducing affordable housing to go to committee; added reference to the Scheme of Delegation	84	30

6. Relationship to the Corporate Strategy and Service Plan

- 6.1 The SPD will support the strategic priorities of *Good quality housing for all income levels and age groups*, by “*delivering Waverley’s new Housing Strategy to ensure homes are the right homes in the right places and that they are truly affordable for those who need them*”.
- 6.2 The Supplementary Planning Document contributes to Outcome 7 of the Housing Delivery and Communities Service Plan: *Deliver new affordable homes: increase delivery of well-designed, well-built affordable housing*.

7. Implications of decision

7.1 Resource (Finance, procurement, staffing, IT)

Any costs associated with implementing the measures in the SPD will be covered by funds within existing budgets. No additional staffing or IT resources are likely to be required.

7.2 Risk management

The Affordable Housing SPD Update recommends implementing rental caps of 70% on one and two bedroom properties and 65% on three and four beds. The First Homes Viability Update (Three Dragons) demonstrated rents from 60% to be viable. This would give officers more influence to secure affordability during negotiations. Rental caps will have an impact on the viability of developments and the tenure mix of homes that can be provided through Waverley’s own housing developments, as it will for other affordable housing providers. The Council will need to lead by example, prioritising affordability for the end user on its own new housing schemes.

7.3 Legal

Lewis Jones, Planning Solicitor:

There are no direct legal implications associated with this report. The Affordable Housing Supplementary Planning Document Update will underpin the Council's delivery of its statutory and national policy requirements as an affordable housing provider, together with the other key functions of the Housing Service.

This supplementary planning document should build upon and provide advice and guidance on policies in an adopted local plan. As it will not form part of the development plan, it cannot introduce new planning policies into the development plan. It will however be a material consideration in decision-making. If formally promulgated for adoption in due course, this will be done in accordance with and to satisfy Regulations 14 and 35 of the TCP (Local Planning) (England) Regulations 2012, in terms of notification to specific interested persons, general publicity and inspection by the public at the Council's offices and on the Council's website.

7.4 Equality, diversity and inclusion

The SPD provides guidance on the implementation of adopted policy in LPP1. An Equality Impact Assessment was undertaken for LPP1 prior to its submission for examination in 2016. LPP1 was found to have neutral or positive impacts on all protected characteristic groups. A further Equality Impact Assessment has been carried out on the SPD updates.

Delivery of new affordable housing actively promotes equality, reduces economic and social disparities and helps to ensure an adequate standard of living for all, regardless of income or background. We know that women and those from BAME groups are more likely to access affordable and social rented housing in Waverley. The Affordable Homes Supplementary Planning Document Update document will meet accessibility standards.

7.5 Climate emergency declaration

Full details of our commitment to sustainability and developing affordable homes which are both built sustainably and enable residents to live in a more environmentally sustainable way, now and for years to come, are set out in our Climate Change and Sustainability Supplementary Planning Document. Readers are signposted to this document on page 3 of the Affordable Housing SPD Update.

8. Consultation and engagement

- 8.1 The draft Affordable Housing Supplementary Planning Document Update was subjected to public consultation from midday on 17.10.22 until midday on 28.11.22.
- 8.2 The consultation was publicised on the Council's website, social media channels and planning policy consultation portal. Hard copies were placed in the Council offices and local libraries. Statutory consultees, Town and Parish Councils, residents' associations/groups, local businesses, developers, landowners and Waverley residents were consulted. A public notice was placed in the Surrey Advertiser, Farnham Herald and Haslemere Herald newspapers setting out the details of the consultation and how representations could be made.

- 8.3 The consultation was carried out via Inovem, the Council's planning consultation portal.
- 8.4 The updated Affordable Housing SPD will help all parties involved with the provision of new affordable housing, such as the Council, landowners, developers and affordable housing providers. The consultation was open to anyone but was aimed at those who will use the SPD to inform the planning applications they submit to the Council, and therefore contained some technical language.
- 8.5 Responses were received by the Planning Policy Team and analysed by the Housing Strategy and Enabling Team. Officers reviewed each response and incorporated comments into the Consultation Statement, before returning the amended document to Executive for recommendation to the Council to adopt.

9. Other options considered

- 9.1 Another option is not to adopt the updated SPD. However, the current Affordable Housing Supplementary Planning Document does not reflect the current aspirations of our Affordable Homes Delivery Strategy, Corporate Strategy, Climate Emergency Declaration or changes to national policy. This option has not therefore been taken forward.
- 9.2 Maintaining current Affordable Rent levels i.e. 80% rents, capped at Local Housing Allowance (LHA) – has its own risks. New rented units set at this level do not help working households on low incomes and creates a disincentive for tenants currently receiving LHA to seek employment. If all households moving into new build affordable rents at 80% are in receipt of LHA, this makes the new community less of a mix of household types and less sustainable.

10. Governance journey

- 10.1 The draft SPD was approved for consultation by Executive on 06.09.22; it was then amended following the consultation period in light of responses received. If agreed by Executive on 07.03.23, it will be taken to Full Council on 21.03.23 with a recommendation for formal adoption at the meeting.

Background Papers

1. [Affordable Homes Delivery Strategy; Build More, Build Better, Build for Life \(2022\) Waverley Borough Council](#)
2. [Waverley First Homes Viability Update \(2021\) Three Dragons](#)
3. [Waverley Housing Affordability Study \(2021\) Icen Projects/ Justin Gardner](#)
4. Updated Affordable Housing Supplementary Planning Document (2023)
5. Affordable Housing Supplementary Planning Document Consultation Statement
6. Equality Impact Assessment on Updates to the Affordable Housing SPD

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Portfolio Holder: Cllr Townsend for Planning 02.02.23; Cllr Palmer for Housing 02.02.23

**AFFORDABLE
HOUSING
SUPPLEMENTARY
PLANNING
DOCUMENT
UPDATE**

2023

Approval & Publication:

Approving Body	Approval route requirement	Publication Type	Publication requirement	Review frequency	Document owner	Next Review Date
Executive, Council		Internal/ external	There are no legal or constitutional requirements for publication	As required, according to national and local policy changes	AS	NA

Version Control Information:

Version	Version Status (<i>Draft, Approved /Published Internally or Externally</i>)	Date	Version Comment	Version Author
V1	Published	April 2021	Approved by Full Council/ 1 st Publication	AL & EL
V2.1	Draft Update	06.09.22	Executive approve for consultation	AL & EL
V2.2	Draft Update – amended	30.09.2022	Amendments (typos) for consultation	AL & EL
V3	<i>Draft Update following consultation</i>	<i>Est 07.03.23</i>	<i>Executive approve amended draft</i>	<i>AL & EL</i>
V4	<i>Final Approval</i>	<i>Est 21.03.23</i>	<i>Approved by Full Council/ update</i>	<i>AL & EL</i>

Impact Assessments and Consideration:

Impact Assessment Type	Required / Not Required	Date Completed	Impact Assessments and Considerations Comment	Assessment Owner
Equality Impact Assessment	Required	04.08.22	See separate EqIA document	AL & EL
Data Protection Impact Assessment	Not required			
Climate Change	Not required			

Document Statement

Waverley is committed to homes to buy or rent for households from all income levels. The strategy sets out our priorities and objectives for the development of new affordable homes by the Council and our partners for the next 3 years.

Scope and Purpose

This update reflects changing policy and practice since the Affordable Housing Supplementary Planning Document was published in April 2021, including the introduction of First Homes.

Amendments are highlighted for ease of reference but will be removed when the final document is adopted and published.

Document Improvement

The Council welcomes comments and feedback on its policies and procedures.

Please contact alice.lean@waverley.gov.uk and esther.lyons@waverley.gov.uk of the Housing Strategy and Enabling Team if you have any comments on this document.

Related information

[Waverley Borough Council Affordable Homes Delivery Strategy 2022-25](#)

[Waverley Borough Council Affordable Housing Supplementary Planning Document](#)

[Waverley Borough Council Quality and Design Standards Update](#)

[Draft Waverley Borough Council Climate Change and Sustainability Supplementary Planning Document](#)

Contents

DOCUMENT STATEMENT	3
SCOPE AND PURPOSE	3
DOCUMENT IMPROVEMENT	3
RELATED INFORMATION	3
CONSULTATION	7
EXECUTIVE SUMMARY	8
PART ONE: BACKGROUND	9
Policy Context	9
The Council’s affordable housing policies	10
AHN1- Affordable Housing on Development Sites (extract from Local Plan Part 1)	10
AHN2-Rural Exception Sites (extract from Local Plan Part 1)	12
Legal Agreements	14
Scheduling affordable housing delivery	17
Maintaining accommodation as affordable housing	18
Recycling of receipts	18
PART TWO: DELIVERY	20

Planning application process20

Negotiations21

Affordable housing providers21

Funding of affordable housing23

Size, mix and tenure split23

Homes for Social or Affordable Rents25

Affordable Home Ownership.....26

First Homes27

Quality and Design Standards28

Building Regulations30

PART THREE: VIABILITY 31

Development Viability31

Basis of the Financial Viability Appraisal33

Outcome of the assessment of scheme viability34

Indexation of Financial Contributions.....35

Committed sums or payments in lieu of affordable housing on site.....36

What is a commuted sum?36

What is the Council’s approach to the use of ‘commuted sums’?37

How will the money be used?38

How is a commuted sum calculated?39

What are the steps in calculating the payment?40

How will this be monitored?.....41

How will this be managed?	42
What is a Vacant Building?	43
How is the Vacant Building Credit calculated?	44
GLOSSARY	46
APPENDIX 1- AFFORDABLE HOUSING PLAN	50
APPENDIX 2- FINANCIAL VIABILITY APPRAISALS	51

LIVE VERSION WITH CONSULTATION CHANGES

CONSULTATION

This Affordable Housing Supplementary Planning Document has been amended to include comments made following public consultation between **17.10.22 – 28.11.22**

LIVE VERSION WITH CONSULTATION CHANGES

EXECUTIVE SUMMARY

*Our **vision** is that Waverley will be environmentally, economically and financially sustainable with healthy, inclusive communities and housing available for all who need it.*

(WBC Corporate Strategy 2020-25)

We are committed to achieving our vision of homes to buy and rent for households from all income levels.
(Build More, Build Better, Build for Life; Waverley Housing Strategy 2022-2025)

1. This Affordable Housing Supplementary Planning Document (SPD) Update sets out the Council's guidance on the securing of planning obligations and affordable housing from new development within the Borough.
2. It has been prepared to support the new Waverley Borough Local Plan Part 1; Strategic Policies and Sites (LPP1) which was adopted by the Council on 20 February 2018.
3. LPP1 is supported by the National Planning Policy Framework (NPPF), which was published in March 2012 and last updated in February 2019. The NPPF sets out the Government's planning policies and how these are expected to be applied. This SPD is subject to change, in light of any consultation responses or changes to Government legislation and policy.
4. This SPD sets out the Council's approach to securing planning obligations in respect of affordable housing from new development across the Borough.
5. Its purpose is to provide all parties with clarity and guidance on when, how and what affordable housing the Council expects on new developments and to assist the Council in achieving the goals set out in our Housing Strategy.
6. An important role of the Council is to enable and coordinate the provision of housing to meet local need. This includes affordable housing, which is provided for eligible households, whose needs are not met by the market.
7. The Council, through the targets set out in LPP1 will seek to match the supply of new homes with the needs of local people, ensuring that all new residential development contributes appropriate new homes in terms of size, type and tenure.

PART ONE: BACKGROUND

Policy Context

8. The Waverley Borough Council Local Plan Part 1; Strategic Policies and Sites (LPP1) was adopted by the Council on 20 February 2018.
9. LPP1 sets out the strategy for development and growth in the Borough to 2032 and includes policies to secure affordable housing.
10. Chapter 9 ('Affordable Housing and Other Housing Needs') includes Policy AHN1; Affordable Housing on Development Sites and Policy AHN2: Rural Exception Sites.
11. Paragraph 9.27 states that 'more detail on the application of Policy AHN1 and Policy AHN2 will be developed through supplementary planning documents which will include details on:
 - ✓ The approach to calculating financial contributions
 - ✓ Up to date information on the type and size of affordable housing required
 - ✓ The cascade mechanism to be applied to cases where viability is an issue
 - ✓ Other matters of detailed interpretation/ application of the policies'

The Council's affordable housing policies

AHN1- Affordable Housing on Development Sites (extract from Local Plan Part 1)

Policy AHN1: Affordable Housing on Development Sites

The Council will require 30% affordable housing on all housing developments where at least one of the following applies:

- In designated rural areas¹ developments providing a net increase of 6 dwellings or more
- In non designated rural areas developments providing a net increase of 11 dwellings or more
- Developments that have a maximum gross internal floor area² of more than 1,000 sqm.

12. Policy AHN1; Affordable Housing on Development Sites 'will apply to single use or mixed use schemes, and to all types of residential development including private retirement homes, sheltered accommodation, extra care schemes and other housing for older people where these fall within Use Class C3³' (paragraph 9.16). Residential care homes and nursing homes (Use Class C2) are not required to provide affordable housing.
13. 'The policy will apply to development sites that exceed the thresholds set out. Where such sites are sub-divided, each sub-division or smaller development must contribute proportionally towards achieving the amount of affordable housing which would have been appropriate on the whole or larger site' (paragraph 9.17)
14. Policy AHN1 applies to all types of residential development sites including change of use, conversions and mixed use sites that incorporate an element of residential development and will be applied to the net increase in the number of units on the site.
15. The thresholds in Policy AHN1 of Local Plan Part 1 were set in accordance with, and to reflect, previous national planning practice guidance. Since the adoption of Policy AHN1 in February 2018, the Government has revised the National Planning

¹ Rural Areas described under [Section 157 of the Housing Act 1985](#). In the Waverley context, this applies to Areas of Outstanding Natural Beauty (AONB).

² Gross Internal Area (GIA) is defined in the [RICS: Code of Measuring Practice 6th Edition \(2007\)](#) as the internal area of a building measured to the inside face of perimeter walls at each floor level

³ Town and Country Planning (Use Classes) Order 1987 (as amended)

Policy Framework, whereby affordable housing is required on major developments, which are defined as developments of 10 or more new homes or where the site has an area of 0.5 hectares or more. Therefore, the Council will be applying the thresholds set out in the revised National Planning Policy Framework.

16. In calculating the number of units to be provided on any qualifying site, the Council will normally round up to the nearest number of whole units. However, where this is not practical, a commuted sum can be offered in lieu of a proportion of a dwelling instead. The final decision as to whether to round up or provide a commuted sum for part of a unit will be dependent on the local housing need, nature of the scheme and the impact of rounding up or down on the design, layout and viability of the affordable units.
17. In all cases where on-site provision is being made, the mix of dwelling types, sizes and tenure split should reflect the type of housing identified as being required in the most up to date evidence of housing needs^{4,5} and the Strategic Housing Market Assessment (SHMA), having regard also to the form and type of development appropriate for the site. Any proposed departure from the mix recommended will require justification and supporting evidence to be provided by the applicant.
18. Contributions towards the provision of affordable housing will be either through the on-site provision of affordable homes or by financial contribution or commuted sum⁶. The provision of affordable housing or financial contributions will be secured through an appropriate legal agreement or undertaking.
19. On developments in designated rural areas with a site area under 0.5 hectares but with a net gain of 6-9 dwellings, the contribution may be in the form of a cash payment equivalent to the cost of providing 30% on-site provision in line with the Council's Commuted Sum Formula. This is paid after the completion of all of the units within the development. In all other cases, on-site provision of affordable housing will be required and only in exceptional circumstances will an alternative to on-site provision be considered.

⁴ [Waverley Housing Affordability Study by Icen Projects/ Justin Gardner \(December 2021\)](#)

⁵ [Waverley First Homes Viability Update by Three Dragons \(December 2021\)](#)

⁶ See Part 3

AHN2-Rural Exception Sites (extract from Local Plan Part 1)

AHN2: Rural Exception Sites

Where there is a genuine local need for affordable housing which cannot be met in some other way, small scale developments of affordable housing may be permitted on land that is within, adjoins or is closely related to the existing rural settlement, provided that:

- The development is small in scale, taking account of the size of the village and respects the setting, form and character of the village and surrounding landscape and
- Management arrangements exist to ensure that all of the affordable dwellings remain available on this basis to local people in perpetuity

Where it can be clearly demonstrated that it is required to ensure the viability of the scheme, the Council will consider a limited element of open market housing, provided that;

- The requirements set out under (i) and (ii) or of this policy and be satisfactorily met
- The new development physically integrates the open market and affordable housing and makes the best use of the land; and
- The number of open market dwellings included in the scheme is the minimum required to provide the necessary number of affordable dwellings

20. 'The NPPF states that in rural areas, local planning authorities should be responsive to local circumstances and plan housing development to reflect local requirements, particularly for affordable housing, including through rural exception sites where appropriate. Local Planning Authorities are also expected to consider whether allowing some market housing would facilitate the provision of significant additional affordable housing' (Paragraph 9.21).

21. 'In the past, the Council has successfully applied a rural exception site policy, which allows for small scale developments of affordable housing within or adjoining rural settlements where there is a clear need. This policy has helped to facilitate the development of a number of such schemes in Waverley' (Paragraph 9.22).
22. 'The identification and development of these sites is usually driven by evidence of local need and potential sites, following the carrying out of a local housing needs survey. Recommendations from the survey will propose the number, type, tenure and mix of affordable homes in line with community need' (Paragraph 9.23).
23. 'Proposals for rural exception sites will need to be accompanied by evidence that clearly identifies and quantifies the need for affordable housing in that settlement. Any development proposals must be small in scale, having regard to the size of the settlement itself. The Council will need to be satisfied that:
- There is local support for the scheme, including adequate consultation with the appropriate Parish Council;
 - The scheme meets a demonstrated housing need identified in a Parish Council Needs survey' (Paragraph 9.24).
24. 'Depending on the circumstances and the proposed site, it will be necessary to demonstrate why the site has been selected and why other sites have been discounted. Any planning permission that is granted must be subject to an appropriate legal agreement to ensure that new dwellings remain affordable housing in perpetuity' (Paragraph 9.25).
25. 'It is expected that the land provided for affordable housing will be provided at low or nil cost. However, if it can be demonstrated that it is necessary to create additional funds over and above those available from free and low-cost land, to overcome specific constraints, or that the provision of low cost dwellings for local needs is not realistic or practicable without extra subsidy, an element of open market housing may be permitted within an overall scheme. This will be in the form of carefully prescribed cross-subsidy schemes, in order to meet the objective of developing rural affordable housing to meet local needs. The Council will need to be satisfied that the number of open market dwellings is the minimum necessary to ensure delivery of the scheme' (Paragraph 9.26).

Legal Agreements

26. Planning obligations are used to make a development acceptable in planning terms. Legal agreements are the tool to secure planning obligations and are negotiated between local planning authorities and those with an interest in a piece of land (e.g. developers). Planning obligations can be secured either through a bilateral Section 106 Agreement or through a 'Unilateral Undertaking' from a developer. Unilateral Undertakings are only signed by the land owner(s) and any other parties with an interest in the land, and not by the Council. These unilateral obligations are most frequently used in planning appeal situations, but can also be used in other circumstances.
27. The statutory basis for allowing anyone interested in land in the area of a local planning authority to enter into planning obligations is Section 106 of The Town and Country Planning Act (TCPA) 1990 (as amended).
28. The Council will expect developers to enter into an appropriate Section 106 Agreement covering all aspects of the delivery of affordable housing on the application site. An estimate of the fee payable for this can be obtained from the Council's Policy and Governance Team. The fee will depend on the complexity of the agreement.
29. The Section 106 agreement will include requirements relating to:
- Definition of affordable housing and affordable tenures
 - The bed size, tenure mix and location of affordable housing
 - Any local connection criteria (if appropriate)
 - Agreement with the Council on the Affordable Housing Plan
 - Safeguarding use of homes as affordable dwellings for future eligible households⁷

⁷ Subject to exclusions, such as Right to Buy/ Right to Acquire

- The retention of obligations relating to the affordable dwellings
- Expectation to recycle any receipts or grant arising from the disposal of all or part of an affordable dwelling⁸
- Mortgagee in Possession clauses and limitations on the occupation of the affordable housing.

A model S106 agreement for First Homes is available at www.gov.uk:

30. The Section 106 Agreement should be finalised and ready for completion prior to the determination of the application. There may be circumstances, particularly with Outline applications, where the details of affordable housing provision have not been finalised. The Section 106 Agreement will contain a requirement for the submission and approval of an Affordable Housing Plan. The Affordable Housing Plan would need to be submitted and approved prior to the commencement of the development. In the case of Outline applications, we recommend this should be submitted as part of the Reserved Matters application, when known.
31. The details to be provided in the Affordable Housing Plan are⁹:
 - a. Total number and % of affordable homes
 - b. Anticipated tenure/ bed size/ type/ gross internal floor areas
 - c. Site layout showing location of affordable homes
 - d. Affordable housing provider
 - e. Nomination and management arrangements
 - f. Affordability

⁸ Subject to current Homes England policies or requirements, and amended as appropriate to reflect any changes arising from Homes England

⁹ See Appendix 1

LIVE VERSION WITH CONSULTATION CHANGES

32. Planning obligations secured by way of a Section 106 agreement or Unilateral Undertaking are binding on the land and are therefore, enforceable against all successors in title. They are registered as a local land charge and will remain on the register. They will therefore, be revealed on local searches until the planning obligation has been fully complied with or the planning permission to which the Section 106 agreement or Unilateral Undertaking relates has expired.
33. If the Council has evidence that a planning obligation is not being complied with, the Council will consider all options including enforcement to remedy the solution.

Scheduling affordable housing delivery

34. The Council will normally include triggers in the legal agreement to ensure that the affordable housing is not delivered significantly in advance or later than the market housing. These may vary from site to site, but a guide would be:
 - Not to allow the commencement of development until a contract has been entered into with an Affordable Housing Provider to deliver the affordable housing in accordance with an approved Affordable Housing Plan.
 - Not to permit nor enable more than 50% of the Open Market Units (or as otherwise agreed in writing between the Borough Council and the Parties) to be in occupation until the date upon which the Parties or their successors in title have transferred the freehold interest in the Affordable Housing Land to the agreed Affordable Housing Provider.
 - Not to permit nor enable more than 75% of the Open Market Units to be in occupation until the date upon which the Parties or their successors in title have completed the affordable housing units.
 - Unless otherwise agreed in writing with the Borough Council, the Affordable Housing Units shall be occupied pursuant to the provisions of the Nomination Agreement.

Maintaining accommodation as affordable housing

35. In order to ensure that the need for affordable housing in Waverley Borough continues to be met in the future, it is considered that there should be provisions that either preserve the status of the affordable housing, replace it, or, if it is no longer used for affordable housing, that resources derived from it are recycled to replace the dwelling(s) that have been lost.¹⁰
36. The Council will therefore, require provisions in the Section 106 agreement that:
- Keep the units within the definition of affordable housing; and
 - Require any purchaser (other than an occupier) to preserve the accommodation as affordable housing, or replace it within the Borough, like for like; and
 - Require any purchaser to take on the obligations in the Nomination Agreement or enter into a replacement Nomination Agreement.

Recycling of receipts

37. There are a number of reasons why affordable housing dwellings may be lost, for example: a tenant's statutory acquisition of a rented dwelling, shared ownership staircasing to 100%, discharge of the charge on a shared-equity dwelling. In all cases the Council expects the dwelling to be replaced within the Borough, or any receipts arising from the disposal of the dwelling to be recycled to provide further affordable housing in the Borough, whenever possible.

Nomination Agreements

38. Providers of affordable housing will be required to enter into a Nomination Agreement with the Council. The Council will normally require 100% of nomination rights on all initial lettings/shared ownership sales and 75% of nomination rights thereafter.

¹⁰ see para 011 Reference ID: 70-011-20210524 of the NPPG

39. Policy AHN1 is intended to meet identified local housing need. It is therefore important that households with an established local connection with the Borough as defined in the Council's Housing Allocation Scheme are nominated to social and affordable rented housing provided through the Waverley Borough Council Local Plan. Rented vacancies will be advertised through the Council's Choice Based Lettings system.
40. Priority will be given to nominations from households with a local connection on shared ownership schemes, except where units are funded by Homes England grant.

LIVE VERSION WITH CONSULTATION CHANGES

PART TWO: DELIVERY

Planning application process

41. All applicants are strongly encouraged to make use of the Council's pre-application advice service before making a planning application.
42. Pre-application dialogue is particularly important where the proposed development may give rise to an affordable housing requirement. This will allow issues such as local housing need and demand to be considered in addition to the form of any affordable housing contribution.
43. The discussions will need to include the following, as appropriate:
 - Clarify the amount, type, size, and tenure of affordable housing to be provided;
 - Identify the affordable housing provider and contact to discuss the delivery of the affordable housing element of the development;
 - Reach agreement with the chosen affordable housing provider in respect of the design and specification of the affordable housing units;
 - Agree the arrangements for the provision of affordable housing with the affordable housing provider prior to the submission of a planning application;
 - Whether specialist providers (such as Adult Social Care) will need to be engaged in relation to the proposed development, in order to gain a better understanding of any requirements they might make in relation to the proposed development; and
 - Agree with Council Officers the Terms of the Section 106 Agreement that will be required to ensure the delivery of the affordable housing.

44. The applicant should outline the proposed methods of meeting the affordable housing requirements of the scheme which need to be submitted as part of any subsequent planning application. If an application (for 6 units or more or site size over 0.5 hectares) does not set out how the affordable housing requirement will be provided, the application may not be validated and will be returned to the applicant. Once the affordable housing provision has been agreed, the Council will draft an appropriate Section 106 agreement.

Negotiations

45. Where a Section 106 Agreement is required, planning permission cannot be issued until affordable housing Heads of Terms have been agreed. It is the Council's aim to carry out negotiations on planning obligations and to agree Section 106 agreements prior to the issuing of the planning permission to which the agreement is linked. The aim is to ensure that developers and landowners are informed of the likely works or contributions required for a proposed development at the earliest opportunity. Ideally, this should be through pre-application discussions, which developers are encouraged to undertake as soon as possible.

Affordable housing providers

46. The Council's preference is for affordable housing to be provided and managed by established affordable housing providers or by the Council. The Council works with a number of affordable housing providers that meet the following criteria:
- Own and manage stock in the Borough;
 - Commitment to developing in the Borough;
 - Commitment to Council housing policies; or
 - Ability to fund and deliver affordable housing.

A list of **affordable housing providers** and their specialisms is available on the Council's website.

47. The Council expects that affordable housing will usually be provided by housing providers registered with Homes England. However, in exceptional circumstances, the Council may use its discretion to allow other affordable housing providers approved by the Council to deliver affordable housing units, subject to affordability and satisfactory management and allocations arrangements being in place. This will, at all times, be strictly in line with the Homes England guidance and the Council's Allocations Scheme.
48. The Council will encourage developers to work in partnership with preferred affordable housing providers. However, if a developer proposes to provide affordable housing other than through a preferred provider, the Council will consider this, taking account of the following:
- Whether the organisation has any other affordable housing in the Borough or in neighbouring local authority areas;
 - Past commitment and performance in the Borough;
 - Local management base and arrangements for interaction with tenants;
 - Management arrangements for external amenity space;
 - Affordable Rent levels set within Local Housing Allowance levels;
 - Nomination arrangements;
 - Track record in delivering and funding affordable housing;
 - Participation in community initiatives; and
 - Genuine community led development, via a Community Land Trust.
49. In all cases the provider of on-site affordable housing will need to meet the requirements of this document.

Funding of affordable housing

50. In formulating proposals for affordable housing, applicants and developers should be aware of the limitations on funding of affordable housing and the price that providers can typically pay for affordable housing dwellings. This is a direct consequence of ensuring affordability to the occupants. It will need to be explored with reference to the location and scheme proposals.
51. The Council's latest assessment indicates that providers should pay developers in the range of approximately 30 to 70% market value for affordable homes. The level is dependent on the type(s) and mix of tenure appropriate as affordable housing on a particular site. Very broadly, in the case of a mixed tenure scheme (i.e. including both rented and affordable homeownership tenures) a developer may expect to receive around 50 to 60% market value for the affordable element overall. This point needs to be taken into account in the very early consideration of development proposals.

Size, mix and tenure split

52. The affordable housing mix shown in the table below reflects the affordable housing size requirements and waiting list demands from local households. Overall, there is an increasing need for smaller homes, particularly 1 and 2 bed properties.

	1 bed	2 bed	3 bed	4+ bed	Total
Affordable home ownership (First Homes, shared ownership and shared equity)	20%	50%	25%	5%	100%
Affordable housing (for social and affordable rent)	40%	30%	25%	5%	100%

[Suggested Mix of Affordable Housing by Size and Tenure – Waverley Housing Affordability Study 2021](#)

53. 25% of affordable homes need to be First Homes, in line with the revised National Planning Policy Framework and at least 10% of the homes overall on each site must be available for affordable home ownership. The latest evidence of need suggests that 60% of affordable homes should be provided at social rents or affordable rents. The remaining 15% are recommended as shared ownership. However, it is recognised that the tenure split on each site may vary, having regard to the specific circumstances of the site. All affordable tenures must meet the definitions set out in Annex 2 of the revised National Planning Policy Framework.

54. The Council intends that part of a dwelling may be either rounded up or down, as illustrated in the example below. Applicants are encouraged to discuss schemes at the early stages of preparation with the Council to enable a workable outcome. The greater need for affordable homes to rent and shared ownership should result in this tenure being rounded up in preference to providing other forms of affordable housing in the Borough, such as First Homes which will be rounded down.

55. Example: A scheme for 100 dwellings

Method	Result
30% affordable housing requirement from Policy AHN1 – 100 x 30%	30 affordable dwellings
Social/ affordable rented = 60% of the 30 affordable housing requirement	18 dwellings
Shared Ownership= 15% of the dwellings	4.5 (rounded up to 5 dwellings) *
First Homes = 25% of the 30 dwellings	7.5 (rounded down to 7 dwellings)

* Tenures for which there is a greater need are rounded up; see para 55.

56. The bed size and tenure split for the affordable homes will need to be determined in the light of up-to-date information. This will include local need and supply, having regard also to the form and type of development appropriate for the site. Any proposed departure from the mix recommended will require justification and supporting evidence from the applicant.

Homes for Social or Affordable Rents

57. The Council is committed to delivering Locally Affordable Homes that local workers and households on low incomes can afford. Social rents for households on the lowest incomes remain a priority for the Council and should be provided on new developments whenever possible. However, where this is not viable, affordable rents should be capped at 70% for 1 and 2 beds and 65% for 3 and 4 bed homes (including service charges) or the current Local Housing Allowance rate for the area; whichever is lower, in order to be affordable to local households.
58. Affordable housing is provided for eligible households whose needs are not met by the market. Affordable housing providers should consider the impact of different rent levels on different household types, and ensure that all household types in need of affordable housing can be catered for, including larger families requiring three or four bedroom accommodation.
59. Tenures and rents levels will need to be agreed with the Council and the affordable housing provider taking on the units. Both rented tenures will be defined in the Section 106 Agreement, to allow providers to deliver social rent instead of affordable rent if funding becomes available at a later date.
60. Local market rent should be calculated using the Royal Institute of Chartered Surveyors' approved valuation methods. **An annual rent increase in line with Homes England guidance is permitted.** Affordable rents must be affordable for local households in housing need.
61. The Council will not support providers seeking upfront payments from tenants in the form of deposits, rent in advance or administration costs in relation to social or affordable rented properties.
62. The Welfare Reform and Work Act 2016 reduced the upper cap on the total amount of benefit an individual household can receive. Where total benefit entitlement is higher than the cap, entitlement will be reduced to the cap. This is likely to present particular challenges for setting rent levels for family sized homes of three or more bedrooms. In these cases, a high Affordable Rent level would cause the total benefit needed by the household to exceed the cap.

Affordable Home Ownership

63. Affordable home ownership includes First Homes, starter homes, discounted market sale housing, and other affordable routes to home ownership (including shared ownership and shared equity), as set out in Annex 2 of the NPPF. 10% of all homes on site should be affordable home ownership products, unless one of the exemptions applies¹¹.
64. Affordable home ownership in Waverley must be:
- For eligible households whose needs are not met by the market. Eligibility for grant funded schemes is set out in the Homes England Capital Funding Guide.
 - Significantly more affordable than existing similar second-hand market properties in the same area of the Borough.
 - Affordable to the majority of applicants living or working in the Borough.
 - Secured at a discount for future eligible households.
 - Provided in accordance with the definitions set out in Annex 2 of the NPPF.
65. Traditionally, affordable home ownership in Waverley has been delivered as shared ownership (or “part-rent part-buy”). To be eligible for shared ownership, applicants must be over 18, have a household income of less than £80,000, and be unable to purchase a property suitable to meet their needs on the open market. The applicant purchases a share in the equity of a property. A mortgage and savings are required for the equity share purchased and rent is paid on the remaining share. After the initial purchase, the owner can usually buy extra shares in the property (known as “staircasing”) until eventually the property is 100% owned. However, staircasing may be capped in certain areas, such as rural exception sites or within Designated Protected Areas. In order to retain affordable housing in these rural areas, the maximum equity share that can be purchased is typically 80%, **unless a waiver is agreed by Homes England**.
66. The Council will work with affordable housing providers to ensure that shared ownership on new schemes remains affordable for local households on low incomes. In order to achieve this, the Council will discuss and agree with the provider the equity share which can be purchased, the rent level on the remainder, and ways in which service charges can be kept to a minimum.

¹¹ Paragraph 65, NPPF

67. Due to the very high open market values in the Borough, affordable housing providers generally offer initial shares in the 10%-40% range. The Council's expectation is for initial shares to be offered from 10% and rents at 2.5% of the value of the unsold share. These shared ownership terms must be agreed in writing with the Council. Service and management charges must be kept to a minimum, without additional enhancements for non housing related services, and should be agreed with the Council in writing. No ground rent will be payable whilst the accommodation remains as affordable housing.
68. Demand for shared ownership homes in Waverley exceeds supply. The Council will seek to work in partnership with affordable housing providers to market shared ownership to households living or working in Waverley. Where possible, the Council will seek to prioritise Waverley households for new build and resale shared ownership properties.

First Homes

69. First Homes are discounted market sale homes that for planning purposes meet the definition of 'affordable housing' stated in the National Planning Policy Framework (see Glossary)
70. 25% of affordable homes need to be First Homes, in line with the revised National Planning Policy Framework.
71. The Waverley Local Plan Part 1; Strategic Policies and Sites (LPP1) was adopted in February 2018. Policy AHN1: 'Affordable Housing on Development Sites' requires that development proposals of 10 or more (net) additional dwellings or sites over 0.5 hectares provide 30% of dwellings as affordable units, with the 'mix of dwelling types, sizes and tenure split should reflect the type of housing identified as being required in the most up to date evidence of housing needs and the Strategic Housing Market Assessment, having regard also to the form and type of development appropriate for the site'. The most up to date evidence of need is the Waverley Housing Affordability Study by Icen Projects/ Justin Gardner (December 2021) and the Waverley First Homes Viability Update by Three Dragons (December 2021).
72. To qualify as a First Home, a section 106 agreement will be required to secure the necessary restrictions on the use and sale of the property, and a legal restriction on the title of the property to ensure that these restrictions are applied to the property at each future sale, guaranteeing perpetuity.

73. Waverley has set the following local criteria for First Homes:
- a) retaining the national guidance of 30% discount for First Homes,
 - b) retaining the national guidance of £80k income threshold
 - c) Applying additional local eligibility criteria to ensure local residents can access the scheme, as set out in the [Waverley Borough Council Housing Allocation Scheme](#), to ensure First Homes are available to local residents and workers.
 - d) Will not apply additional priority for local essential workers, as the proposed 'working locally' eligibility criteria include all essential workers earning under £80k pa.

Quality and Design Standards

74. The Council's expectation for new developments is that the affordable homes should be indistinguishable from, and well-integrated within, the market housing on the site. In other words, the design quality of the affordable housing should be as good, if not better, than the private market housing. The Council has developed Design Standards and Specifications¹² for its own new build developments which set out best practice for design and quality of affordable housing.
75. The Council expects the affordable homes to be distributed throughout the site in small clusters appropriate for the scale and design of the development. Locating affordable housing at the end of a cul-de-sac should be avoided where possible. Affordable homes should face private market units as neighbours, in order to promote an inclusive, sustainable community.
76. Existing design policies need to be taken into account when considering affordable housing. Affordable homes in Waverley should comply with the [Building regulations M4 \(2\) Category 2 Standard: "Accessible and Adaptable Dwellings"](#) to meet the needs of older people and people with disabilities¹³.
77. To make best use of affordable housing stock in the context of recent welfare reforms, the Council's expectation is that 2-bed homes should accommodate 4 people, and 3-bed homes should accommodate 6 people (where these are proposed as rented accommodation). For affordable home ownership, 3-bed 5-person units may be acceptable. **This is because rented homes**

¹² [WBC Design Standards](#)

¹³ As required under Policy AHN3, Waverley Design Standards and secured in s.106 agreements

are likely to be filled to capacity, in line with the [Waverley Borough Council Housing Allocation Scheme](#). Smaller homes for affordable home ownership may improve affordability. Affordable homes should meet the Nationally Described Space Standards set out below,

Unit type proposed	Minimum floor area to meet NDSS	Minimum bedroom size requirement
1-bed flat	50sqm (1b2p)	11.5sqm (double or twin room)
2 bed flat	70sqm (2b4p)	11.5sqm (double or twin room)
2-bed house	79sqm (2b4p)	11.5sqm (double or twin room)
3-bed house	102sqm (3b6p) if rented 93sqm (3b5p) is acceptable if shared ownership	11.5sqm (double or twin room) Single bedspace must be at least 7.5sqm and at least 2.15m wide
4-bed house	115sqm (4b7p)	11.5sqm (double or twin room) Single bedspace must be at least 7.5sqm and at least 2.15m wide

78. The Affordable Housing Units shall be constructed in accordance with the requirements imposed by Homes England’s Design and Quality Standards (mandatory items) current at the time of construction.
79. The majority of residents of affordable housing are car users. Parking for affordable housing should meet the Council’s existing Residential Parking Guidelines. New council homes will also need to meet the parking standards set out in the WBC Design Standards and Specifications. The Council expects the same parking provision to be made available for affordable and market housing of the same size, including a preference for in-curtilage parking. Tenure neutrality is also required in the design of

car parking for affordable housing. Parking courts are discouraged for design reasons and in line with 'Secured by Design'¹⁴ guidance.

Building Regulations

80. Your project will need to meet building regulations.
81. Where the Council is the applicant for development led by the Housing Development Team, the Waverley Borough Council Building Control service will be appointed to support compliance within the Building Regulations.
82. Where the application is for a mixed tenure scheme and affordable housing is provided by another affordable housing provider, they will be encouraged to use Waverley Building Control. This will enable an end to end, one team approach for the efficient delivery of the development, subject to compliance with policy and regulations.

¹⁴ www.securedbydesign.com

PART THREE: VIABILITY

Development Viability

83. On sites in designated rural areas providing a net increase of 6 dwellings or more, or in non-designated rural areas development providing 10 or more (net) new dwellings or having a site area of 0.5 hectares, the presumption is that 30% affordable housing will be provided on-site, in line with the NPPF and Policy AHN1. However, the Council recognises that there may be exceptional situations where the specific circumstances of the site, or other matters, could mean that achieving the required level of affordable housing would compromise development viability. This must be demonstrated through a viability submission, which should adopt an ‘open **book**’ approach in line with Government guidance¹⁵.
84. Where a prospective developer considers viability to be an issue, the onus will be on the developer to provide appropriate financial evidence with any planning application in line with national guidance. The Council’s strong preference is for the required delivery of affordable homes on the development site. If the Council is satisfied that the financial appraisal confirms that affordable housing cannot be provided in accordance with the policy, then negotiations will take place to secure the highest level of affordable housing that is viable. All applications which seek to amend or reduce the affordable housing requirement on the basis of viability will be taken to Planning Committee, **in accordance with the Waverley Scheme of Delegation to Officers**¹⁶ (as updated 18 October 2022).
85. When assessing the overall viability of a scheme, developers should take full account of the scale of planning obligations that are likely to be required, in addition to any Community Infrastructure Levy¹⁷ liability that may arise. Where a developer raises viability concerns in relation to contributions for an application, the Council will expect a full “open-book” viability assessment for the scheme to be submitted to support the viability case being made¹⁸.

¹⁵ www.gov.uk/guidance/viability

¹⁶ See [Waverley Constitution updated 18 October 2022](#)

¹⁷ The Community Infrastructure Levy Regulations 2010 (as amended) http://www.legislation.gov.uk/uksi/2010/948/pdfs/uksi_20100948_en.pdf

¹⁸As per Appendix 2

86. Affordable housing is a corporate priority for the Council. Therefore, if a viability issue arises, consideration is expected to be given to a range of alternative options before a reduction or removal of affordable housing will be considered. This will include prioritising the provision of affordable housing over other less critical infrastructure contributions to ensure viability.
87. The Council reserves the right to have all viability assessments checked by an independent RICS-qualified surveyor/valuer to ensure the robustness and validity of the assumptions and methods used. In these circumstances, the Council will appoint the surveyor/valuer, but the viability assessment costs incurred by the Council will need to be paid by the applicant. The applicant will also be required to provide a written undertaking to cover the costs before the surveyor/valuer is appointed. Viability reports resulting from this process will be shared and discussed with the applicant.
88. Where, following the above process, conflicts of opinion about scheme viability remain, additional viability work may be necessary. If this is the case, the applicant must first undertake to reimburse the Council in respect of additional costs incurred. Any remaining disputes between the Council and the applicant will be referred to an independent arbitrator (in accordance with RICS guidance).
89. To ensure open and transparent decision making, the Council expects all viability assessments to be publicly available unless the applicant can clearly demonstrate why parts must be redacted, in line with Government guidance on viability. The applicant must highlight the scope of this prior to submission in order for the Council to make a judgment as to what information is released for public view. The weight to be given to a viability assessment will take into account the transparency of the applicant's approach.
90. Affordable housing on s.106 sites may be funded by a combination of private subsidy (in the form of nil cost land) and public subsidy (grant funding). The Homes England funding prospectus states that, "If grant is requested for affordable homes provided under a Section 106 agreement, on a larger site developed as market housing, these homes will need to be additional to those that would be delivered under the Section 106 agreement alone, without grant." Negotiations with landowners should therefore start on the assumption that grant funding from Homes England for affordable homes will not be available.

91. In brief, the viability submission should include as the key elements:
- A summary clearly stating the request to vary the usual affordable housing requirements and setting out (with explanation) the reasons why, in the applicant's view, the development is unviable when policy compliant affordable housing provision is included; and
 - Detailed Financial Viability Appraisal(s) with supporting information, and all sources stated, demonstrating how the applicant's assumptions come together to inform the submitted viability view. Part 2 and Appendix 2 refer to the Council's specific expectations in these respects.
92. If an applicant wishes to make a viability submission, this should be included as part of the planning application, alongside the Affordable Housing Statement. A draft Unilateral Undertaking may also be included at the applicant's discretion. It should be noted that planning applications without the required information or documentation are unlikely to be validated.
93. A Financial Viability Appraisal, including an explanation, conclusion, information and sources is only current at the time it is prepared. Financial viability will vary over time with the changing economic and property markets. On large sites that are expected to build or sell over a number of years, and particularly where the planning application is in Outline, viability may need to be assessed at multiple/varying points. It will likely need to be considered at pre-application/initial application stage, then subsequently for each phase, and updated when the Reserved Matters application is made or prior to the commencement of each phase.

Basis of the Financial Viability Appraisal

94. The minimum requirements to be provided by the applicant are outlined in Appendix 2. Each assumption relating to the proposed scheme revenue (values), costs, land value and profit must be supported with component figures, including sources made clear. The submitted approach, assumptions and reasoning will need to be clearly explained in detail.
95. The Council will assume that: the cost of meeting the affordable housing requirements in Policy AHN1 should be reflected in the price paid, or price to be paid, for the land, and should be based on:

- No public subsidy or grant;
- Payment by the provider of the affordable housing should be based on the provision meeting current Homes England Guidance;
- Any site constraints and the development scope (including as influenced by planning policies) including abnormalities should be reflected in the price paid, or to be paid, for the land; and

In accordance with the relevant viability guidance, the land value to be used in the calculation or as a land value benchmark should be the current existing use land value, not necessarily the amount paid for the land.

96. As set out in Paragraph 81 above, in order to assess the applicant's financial viability appraisal, the Council may need to seek advice. It is reasonable for the applicant to bear the costs in these circumstances, as per Paragraph 9.20 in the Local Plan Part 1.

Outcome of the assessment of scheme viability

97. Where the Council is satisfied that the usual policy requirements for affordable housing cannot be met in full due to viability issues, the Council will decide on the appropriate level of reduction or other revision to the affordable housing requirement to enable the scheme to remain financially viable.
98. Where the level of affordable housing provision is reduced, due to an accepted viability submission position, clawback or top-up by way of an affordable housing financial contribution may be pursued by the Council. If the development of the site proves to be significantly more financially viable as it progresses than the initial position suggested would be the case, subject to further viability assessment, clawback or top-ups may be considered by the Council.
99. If the Council decides that a clawback or similar arrangement is required this will be incorporated into a Section 106 Agreement or Deed of Variation. This will usually be based on the actual costs, values, revenues etc. of the completed development compared with the viability submission made with the application or agreed subsequently.

Indexation of Financial Contributions

100. Financial contributions will be subject to indexation by the Council in order to ensure that their value does not decline in the period between the signing of the agreement and the date on which the contributions are paid.
101. The method of indexation will be negotiated with the applicant and once agreed, will be specified within the Section 106 agreement. The method will generally be based on the published Retail Price Index (RPI) or an appropriate index published by the Build Cost Information Service (BCIS), which is the responsibility of the RICS. In the event that there is a decrease in the relevant agreed index, the financial contribution payable shall not fall below the figure originally set out within the Section 106 agreement.

LIVE VERSION WITH CONSULTATION CHANGES

Commuted sums or payments in lieu of affordable housing on site

What is a commuted sum?

102. A commuted sum (or payment in lieu) is an amount of money, paid by a developer to the Council. Paragraph 63 of the revised National Planning Policy Framework enables the Council to accept a commuted sum, towards the provision of affordable housing on an alternative site where it is not possible to incorporate affordable housing within a scheme. Policy AHN1 enables the Council to require commuted sums in the following cases:
- a. in designated rural areas on developments with a net gain of 6-9 dwellings but where the site area is below 0.5 hectares
 - b. in exceptional circumstances where the size or scale of a development triggers a requirement for affordable housing, but it is not possible to achieve appropriate affordable housing on site. This route will be followed only where more direct provision of affordable homes has been explored and the Council is satisfied that is not workable given the particular circumstances, subject to the provision of robust and evidenced reasons
103. The money will be used to provide affordable housing on an alternative site. It is therefore, appropriate that the level of the payment in lieu should relate to how much it will cost an affordable housing provider to buy land on the open market.
104. The principles applied in the collection and use of these payments are very similar to those for other planning obligations. They will generally be dealt with through a legal agreement (under Section 106) related to the land, which triggers obligations once the specific planning permission is implemented.

What is the Council's approach to the use of 'commuted sums'?

105. The revised National Planning Policy Framework¹⁹ states that where a need for affordable housing is identified, "planning policies should... expect it to be met on-site."²⁰
106. However, where off-site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities and meeting local housing need, a commuted sum may be considered²¹.
107. Off-site delivery via the provision of land may apply where the Council considers that such a contribution, either on the proposed development site or on an alternative site, would meet the identified housing needs of the Borough more effectively. Land should be serviced to its boundaries and be of sufficient area to provide the equivalent on-site provision. An appropriate timescale will be applied. Financial contributions may also be sought in addition to land where the site area is insufficient to provide the equivalent on-site provision.
108. Where a commuted sum is proposed, the onus will be placed on the applicant to demonstrate why it will not be possible to provide the affordable housing on site. The applicant will also need to show that other options – for example cross-subsidy between rented and shared ownership units/other affordable tenures, or providing the affordable housing on another site – have been considered, and why they were not viable.
109. It must be stressed that commuted sum payments are exceptions, and in all cases the decision on whether to accept a financial contribution rather than on-site provision will be the Council's. This is consistent with Policy AHN1 which states "On-site provision of affordable housing will be required and only in exception circumstances will an alternative to on-site provision be considered."

¹⁹ NPPF 2021 Paragraph 63

²⁰ Unless the site meets criteria set out in Paragraph 107.a.above

²¹ Unless the site meets criteria set out in Paragraph 96.a.above

How will the money be used?

110. The Council will use financial commuted sums in a number of ways and will require the flexibility to do so to be reflected in the Section 106 Agreement or Unilateral Undertaking.
111. Affordable housing providers can apply to the Council for commuted sum funding for their schemes; these funds can also be spent on Council new build developments.
112. Commuted sums will be earmarked to enable the provision of affordable housing through a variety of means, for example:
 - a. To support the new build development of affordable housing or create additional, larger or a different tenure mix within the existing stock.
 - b. To provide 'top up' subsidy on schemes in order to make it possible for a higher proportion of affordable homes or to make those homes more affordable.
 - c. To fund extra units of affordable housing on alternative sites.
 - d. To contribute to forward-funding/kick-starting of schemes or to reduce funding gaps within pipeline/current affordable housing schemes or other similar initiatives according to scheme circumstances and the funding climate.
 - e. To convert, refurbish, redevelop or make improvements to existing affordable housing where the accommodation no longer meets an identified need.
 - f. To aggregate financial contributions from different sites and spend contributions in the way that best achieves the Council's and the local community's priorities for affordable housing. The number of units resulting from expenditure may be greater or fewer than the number of units used to calculate the contribution, because dwelling types, tenure, specifications and other aspects will vary from scheme to scheme. Financial contributions may be used to fully fund a project or to top up funding from other sources.

- g. To spend on alternatives sites in Waverley before consideration is given to schemes in the wider area (beyond Waverley), to which the Council receives nomination rights or which benefit Waverley residents.
- h. Other innovative methods of providing affordable housing.

113. Decisions on the expenditure of financial contributions will be made in accordance with the Council's Scheme of Delegation to Officers, details of which are available on the Council's website.

How is a commuted sum calculated?

- 114. On sites where a financial contribution is being made, the Council will calculate the payment which seeks to equate to the land value of the relevant dwelling plots (those that would have been made available for on-site affordable housing). In essence the thinking involves calculating how much it would cost to go elsewhere and replace the land on which the affordable housing would have been provided on-site.
- 115. This approach assumes a straightforward payment made by the landowner (who may also be the developer) under the terms of a Section 106 agreement in much the same way as occurs with planning obligations for aspects such as highways/transport, open space, education etc.
- 116. The methodology assumes an additional planning obligations payment being made by the developer, albeit from the increased Gross Development Value sales receipts which results from having no affordable housing on-site.
- 117. The final sum agreed will be at the Council's discretion.

What are the steps in calculating the payment?

- i. Applicant to provide an independent valuation of the Open Market Value of all units on the site, along with the Gross Internal Floor Area²² in order to calculate the sales rate (£ per sqm). The Open Market Values and Gross Internal Floor Areas must be signed off by a RICS Chartered Surveyor or RIBA member architect.
- ii. Council to agree the type and floor area of a suitable relevant affordable housing dwelling which would otherwise have been provided on site for use in the calculation.
- iii. Multiply by the Residual land value percentage (38.1%) to provide a base land value²³.
- iv. Add 15% of the result to reflect site acquisition and servicing costs.
- v. This gives the sum(s) equivalent to the land cost per whole affordable dwelling type(s) or may be more than one level of sum if there are multiple dwelling types being factored into the affordable housing calculation).
- vi. Apply that (or those) to the relevant total scheme numbers and the Council's 30% affordable housing requirement. In this way, the calculation can deal with part dwelling equivalents. The outcome need not be affected where this end stage does not produce round (whole) dwelling number dwellings.

²² Gross Internal Area (GIA) is defined in the RICS: [Code of Measuring Practice 6th Edition \(2007\)](#) as the internal area of a building measured to the inside face of perimeter walls at each floor level, as defined on page 12

²³ [Affordable Housing Viability Study, Para 3.9.22](#)

Table 1 below provides a worked example. The Council will calculate Commuted Sums using the following steps, on receipt of the required valuations.

Table 1: Worked example of commuted sum	e.g.
Scenario= Development of 10 x three bed houses	
Average open market sales value, for a comparable size and type of dwelling in the local area which would otherwise have been provided on site	Open market value of £344,000 for a 3 bed house with a Gross Internal Floor Area of 110m2
Work out Open Market Value per M2	£3,127 per m2 (3,127.273)
Multiply cost per m2 by 102 for floor area of affordable home with 3 bedrooms	X 102=£318,982
Multiplied by residual land value (38.1%)	X 38.1%= £121,532
Plus 15% of the result (of affordable market value x 38.1%)	+18,230
= payment in lieu per three bed house	=£139,762
Multiplied by 3 (to represent the units/ parts of units which would otherwise have been provided on site) =	
TOTAL PAYMENT IN LIEU OF £419,286	

How will this be monitored?

118. The Council will keep and monitor a record of all sums agreed and received and how they have been spent.
119. Generally, the Council will expect the following to be incorporated in the S.106 agreement or Unilateral Undertaking:
 - a. The agreed sum to be index linked on an annual basis from the date the agreement was signed until the date of actual payment. S.106 agreements can take time to complete so it will be important for applicants to consider the requirements at an early stage, working closely with the Council. Indexation will be on an annual basis in accordance with the Retail Price Index.

- b. A milestone that triggers the payment of the contribution will need to be agreed between the Council and the Applicant. Usually this will be the carrying out of any Material Operation or on the commencement of development. Alternatively, it may be 50% on commencement and 50% when 50% of those units have been sold / occupied.
- c. Applicant to notify the Council at Section106@waverley.gov.uk in accordance with the S.106 agreement, of any approaching payment triggers.
- d. On receipt of the notification, the Council will issue a demand notice for the amount payable, including any indexation.
- e. Penalty interest will be payable on late payments.
- f. The Council will specify in the Section 106 agreement the time period in which to spend the contribution.

120. All commuted sums received are added to the available resources in the Council's Housing Grant Budget. The 1988 Local Government Act s.25 allows Local Authorities to use grant to fund the provision of affordable housing on new development sites, subject to the appropriate Homes England guidelines in respect of maximum public subsidy.

How will this be managed?

- 121. The Council will use commuted sums to develop affordable housing within 10 years from the date a sum was received. The Council will return un-spent commuted sums, with accrued interest, to the developer, if they are not spent for the purposes for which they were sought within a ten-year period from the date the money is paid to the Council.
- 122. The approach and assumptions will be monitored and reviewed if necessary, depending on delivery experiences. In any event, the approach is intended to cope with an element of flexibility in its application.

Vacant Building Credit

123. A 'Vacant Building Credit' is available to developers to incentivise them to bring vacant dwellings back into use. Where a vacant building is reused or redeveloped, the affordable housing contribution will be reduced by a proportionate amount²⁴.
124. Affordable housing contributions may be required for any increase in floor space.' The Vacant Building Credit applies to on-site affordable housing as well as financial contributions to off-site provision.

What is a Vacant Building?

125. A vacant building must be physically empty (i.e. not used for storage, excluding rubbish left after vacation of the buildings such as broken furniture/ papers etc.).
126. In coming to a view about whether the building is empty, Officers will need to:
- Consider whether the building is covered by an extant or recently expired planning permission for the same or substantially the same development;
 - Consider the reason why the building became vacant and the last known use of the building;
 - Consider whether there is an extant planning permission for the development of the building; and
 - Establish current uses and extent of vacant areas through a site visit, speaking to Revenues Team and requesting a Statutory Declaration.
127. Vacant Building Credit does not apply where the building has been abandoned. 'Abandonment' in this context follows the interpretation in general planning law. The test is objective and is applied by consideration of the known circumstances. Factors such as the condition of the building, length of non-use, whether there has been an intervening use, and evidence of the

²⁴ Equivalent to the existing gross floorspace of the existing buildings.

owner's intentions, may determine whether a building has been abandoned. The Council may consider that the Vacant Building Credit is not appropriate for buildings which have become vacant solely to enable development to proceed.

How is the Vacant Building Credit calculated?

128. Applicants need to provide an independent valuation including the Gross Internal Floor Area²⁵ and Open Market Value of any vacant building for which they wish to claim Vacant Building Credit, and also for the proposed buildings. The Gross Internal Floor Areas and Open Market Values must be signed off by a RICS Chartered Surveyor or RIBA member architect. Please note that the onus will be on the Applicant to demonstrate to the satisfaction of the Local Planning Authority a building's vacancy and to provide accurate Gross Internal Floor Area measurements.
129. The following example shows how the methodology for calculating affordable housing contributions would be applied to a proposed development. This is for illustrative purposes only and should not be relied upon for calculation purposes.
130. The existing vacant Gross Internal Area of any buildings proposed to be brought back into lawful use or to be demolished and redeveloped will be calculated as a percentage of the proposed Gross Internal Area, leaving the net increase in floor space. The required percentage of affordable housing will then be applied only to the net increase in floor space.

Element	Represented by/ units	Worked Example
Existing vacant floor space	A sq m	300 sq m
Proposed total floor space of new development	B sq m	Mixed use development providing 40 units 2,400sq m
Net increase in floor space (B-A)	C sq m	2,400sq m- 300 sq m= 2,100sq m

²⁵ Gross Internal Area (GIA) is defined in the [RICS: Code of Measuring Practice 6th Edition \(2007\)](#) as the internal area of a building measured to the inside face of perimeter walls at each floor level

Element	Represented by/ units	Worked Example
30% affordable housing required under Policy AHN1	D affordable homes usually required under planning policy	30% of 40 units is 12 affordable homes usually required
Calculation for affordable housing after Vacant Building Credit	$\frac{C}{B} \times D = E$	$\frac{2,100}{2,400} \times 12 = 10.5$ affordable homes Required after VBC
Resulting Affordable Housing Requirement	E	10.5 affordable homes required ²⁶

LIVE VERSION WITH CONSULTATION CHANGES

²⁶ E.g. 10 affordable homes on site and 0.5 via commuted sum

Glossary

Affordable Housing (NPPF Definition): the Government's definitions of 'affordable housing, affordable housing for rent, First Homes, discounted market sales housing and other affordable routes to home ownership' are defined in Annex 2 of the revised National Planning Policy Framework (NPPF) or any future guidance that replaces it, meaning housing for sale or rent for those whose needs are not met by the market.

Affordable Housing Provider means a registered provider of social housing within the meaning of Section 80 (1) of the Housing and Regeneration Act 2008, or alternatively a body providing affordable housing.

Affordable Rent Affordable housing provided to households who are eligible for affordable rented housing and provided at a rent of no more than 80% of the local market rent (including service charges) and always below the Local Housing Allowance and where local market rents are calculated using the Royal Institution of Chartered Surveyors approved valuation methods.

AHN1 Affordable Housing on Development Sites [Waverley Local Plan Policy]

AHN2 Rural Exception Sites [Waverley Local Plan Policy]

AHN3 Housing Types and Size [Waverley Local Plan Policy]

Amenity: A positive element or elements that contribute to the overall character or enjoyment of an area. For example, open land, trees, historic buildings and the inter-relationship between them, or less tangible factors such as tranquillity.

Area of Outstanding Natural Beauty (AONB): A statutory landscape designation, which recognises that a particular landscape is of national importance. The primary purpose of the designation is to conserve and enhance natural beauty of the landscape.

Development Plan: The adopted suite of documents, which set out the parameters for all development in the Borough.

Enabling Development: A development that would normally be rejected as contrary to established policy, but which may be permitted because the public benefits would demonstrably outweigh the harm to other material interests.

First Homes First Homes are a specific kind of discounted market sale housing which are classed as ‘affordable housing’ for planning purposes. First Homes:

- a) must be discounted by a minimum of 30% against the market value;
- b) are sold to a person or persons meeting the First Homes eligibility criteria;
- c) on their first sale, will have a restriction registered on the title at HM Land Registry to ensure this discount (as a percentage of current market value) and certain other restrictions are passed on at each subsequent title transfer; and,
- d) after the discount has been applied, the first sale must be at a price no higher than £250,000 (or £420,000 in Greater London).

Homes England: Homes England is the Government’s national housing and regeneration agency for England. It provides investment for new affordable housing and to improve existing social housing, as well as for regenerating land. It is also the regulator for social housing providers in England.

Waverley Borough Council Local Plan Part 1: The new Local Plan is the overarching planning document for Waverley Borough and replaces the previous Local Plan and relevant Development Control Policies documents which were adopted in 2002. The new Local Plan sets out the planning strategy for the years up to 2032 to deliver the social, economic and environmental needs of the whole Borough, as well as looking beyond the Borough’s boundaries.

Local Plan: A plan for the future development of a local area, drawn up by the local planning authority in consultation with the community. In law, this is described as the development plan document adopted under the Planning and Compulsory Purchase Act 2004. A local plan can consist of either strategic or non-strategic policies or a combination of the two.

Locally Affordable Homes: Homes which are affordable to Waverley workers or low-income households living in Waverley, according to the Council’s latest evidence source.

M4 (1) Category 1: Visitable Dwellings, Schedule 1 to Building Regulations 2010

M4 (1) Category 2: Accessible and adaptable dwellings, Schedule 1 to Building Regulations 2010

M4 (1) Category 3: Wheelchair User Dwellings, Schedule 1 to Building Regulations 2010

Material consideration: A matter that should be taken into account in deciding a planning application or on an appeal against a planning decision.

National Planning Policy Framework (NPPF): The key document, introduced in March 2012 and last updated in 2021, setting out Government policy in relation to planning in England. The NPPF is part of the Government's reforms to make the planning system less complex, more accessible and to promote sustainable growth.

Open market value: The value a property might reasonably fetch if sold on the open market where there is a willing buyer and a willing seller.

Planning Obligation: A legal agreement entered into under section 106 of the town and Country Planning Act 1990 to mitigate the impacts of a development proposal.

Rent Caps: setting overall maximum rent levels

Section 106 Agreement: See '*Planning Obligation*'

Shared Equity: The purchaser acquires the whole of the property but effectively only pays a proportion of the value; the remaining value is secured by an equity loan. There have been, and are a variety of schemes available, some with Government support.

Shared Ownership: Shared ownership is a mechanism for purchasing a property for those who cannot afford full home ownership. A percentage of the equity is purchased by means of deposit and mortgage. The retained equity is held by an Affordable Housing Provider (or similar). The owner takes out a lease, and pays rent on the retained equity. Generally initial purchases are 25-40% of the equity. Owners can usually purchase further shares of the property over time – this is known as “staircasing”.

Social Rented Housing Affordable homes provided by Affordable Housing Providers to households who are eligible for social rented housing, and for which guideline target rents are determined through the national rent regime;

Supplementary Planning Documents (SPD): Documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.

Viability: In planning terms relates to the assessment of a development scheme to establish that favourable conditions regarding the financial aspects will enable development to proceed.

LIVE VERSION WITH CONSULTATION CHANGES

Appendix 1- Affordable Housing Plan

The Affordable Housing Plan should generally meet the requirements outlined below. It is anticipated that the Developer and Affordable Housing Provider will submit the Affordable Housing Plan jointly. It is agreed by the parties that where any of the information required below is not available at the time of submitting the Affordable Housing Plan, such information shall be submitted or re-submitted (where an amendment is required) for approval prior to commencement of construction of any affordable housing unit within the relevant phase:

	INFORMATION/ DATA	PLEASE TICK IF INCLUDED
1.	The total number of affordable units in the phase as a percentage of the total units in the phase	
2.	The anticipated tenure, bed size, gross internal floor area and type of each of the affordable units	
3.	A site layout plan showing the location, tenure and bed size of the units	
4.	Plans showing the indicative internal layout of each type of unit	
5.	Confirmation that Affordable Housing Units shall be constructed in accordance with building regulations applicable at the time of registration of the Development with the relevant body	
6.	Name of Affordable Housing Provider that will deliver the affordable units with contact person	
7.	Confirmation that all of the units will be allocated either according to the draft Nomination Agreement set out in the Section 106 Agreement, or through the Home Buy Agent	
8.	Details of proposed shared ownership share % and service charge for each type of unit	
9.	Confirmation that rents will be set social rent or Affordable Rent set no higher than 70% for 1 and 2 beds or 65% for 3 and 4 beds. Rents (including service charges), should be no higher than current Local Housing Allowance rates in the Borough.	
10.	Details of management arrangements.	

Appendix 2- Financial Viability Appraisals

Any Development Viability Appraisal submitted in support of a developer’s case for reviewing or reducing planning obligations identified as necessary by the Council, should contain the following information and data as a minimum.

All information and data should be evidenced from an independent RICS-qualified expert or a reliable and reputable source in relation to secondary data.

Figures included within the appraisal should be benchmarked.

INFORMATION/ DATA	PLEASE TICK IF INCLUDED
1. Methodology used for the appraisal and details of any appraisal software or toolkits used.	
2. Land values, both current and at the time of purchase (if different)	
3. Price paid for the land; & costs taken into account when arriving at the price paid for the land (if the land is not owned by the applicant – details of any option agreements or agreements to purchase)	
4. Gross and net area of development	
5. Number size and type of units	
6. Build costs (per square metre)(and comparison with appropriate published RICS data)	
7. Abnormal or exceptional costs not reflected in the land value/price (Note: All abnormal and exceptional development costs should be supported by robust and costed specialist reports, including full technical data to support the stated costs)	

8. Costs associated with bringing a heritage asset back into beneficial use or enabling development and/or costs of repairs (Note: all such costs should be supported by robust and costed specialist reports, including full technical data to support the stated costs)	
9. Other costs (design, legal, consultants, planning etc.)	
10. Cost of any other planning obligations including infrastructure requirements and financial contributions	
11. Build programme and phasing	
12. Interest rates, cap rates, loan costs, cash flows	
13. Developer's profit and an explanation of its make up, and any company or financiers requirements	
14. Anticipated phasing	
15. Marketing and legal costs (and as a % of GDV)	
16. Anticipated sales price for each unit type, and current assumed value of each unit type	
17. Anticipated phasing of sales	
18. Ground rents and services charges payable	
19. Proposals for on-site affordable housing meeting the requirements of the Supplementary Planning Document, modelling a range of scenarios i.e. <ul style="list-style-type: none"> a. 20% and 30% affordable housing of which <ul style="list-style-type: none"> i. 60% social and/or affordable rent/ 40% affordable home ownership ii. 50% social and/or affordable rent/ 50% affordable home ownership iii. 100% intermediate, including shared equity products. 	
20. Attach evidence of engagement with affordable housing providers	
21. Anticipated price to be paid by the affordable housing provider, and the assumption on which this is based.	

LIVE VERSION WITH CONSULTATION CHANGES

Depending on individual site circumstances, further information may be required, including:

INFORMATION/ DATA	PLEASE TICK IF INCLUDED
22. Developer's Market Analysis Report	
23. Details of company overheads	
24. Copy of financing offer/letter	
25. Copy of cost plan	
26. Board Report on scheme	
27. Letter from Auditors re: land values and write offs	
28. Sensitivity analysis showing different assumption options (e.g. low, medium & high)	
29. For mixed use schemes similar information and data will be required on the non-residential uses.	

LIVE VERSION WILL CONSULTATION CHANGES

**Affordable
Housing
Supplementary
Planning
Document**

**Consultation
Statement**

February 2023

Affordable Housing Supplementary Planning Document Update (February 2023)- Consultation Statement

Why is the Affordable Housing Supplementary Planning Document being updated?

The Waverley Borough Council [Local Plan Part 1](#); Strategic Policies and Sites (LPP1) was adopted by the Council on 20 February 2018. LPP1 requires us to have an Affordable Housing SPD to include details on the approach to calculating financial contributions; up to date information on the type and size of affordable housing required; the cascade mechanism to be applied to cases where viability is an issue; other matters of detail interpretation/ application of the policies. An adopted Affordable Housing SPD is a material consideration for planning applications determined within the borough.

The current Affordable Housing SPD was adopted in April 2021. Its purpose is to provide clarity to developers, affordable housing providers, Development Management officers, stakeholders and local residents on our affordable housing requirements. An update is necessary to take into account changes in national policy and to reflect the commitment to lower rents in our adopted Affordable Homes Delivery Strategy (April 2022) set out below:

Social Rent

The need to prioritise building housing for social rent is highlighted, in line with our [Affordable Homes Delivery Strategy](#)¹. Social rents are the lowest rent of all, set at an equivalent to around 55% of market rent, for our lowest income households.

Affordable Rent Cap

¹ Affordable Homes Delivery Strategy; Build More, Build Better, Build for Life (2022) Waverley Borough Council

If social rents are unviable, we will require a cap of 70% of market rents on 1 and 2 beds and of 65% on 3 and 4 beds, in line with supporting evidence on need from the Affordability Study² and viability from the Three Dragons³ study.

First Homes

The update reflects the national First Homes requirements which were introduced since the Supplementary Planning Document was originally published and sets out how the policy is applied locally.

Viability

This update clarifies that all applications seeking to amend or reduce affordable housing provision will go to committee, following the addition of this new requirement to the Waverley Scheme of Delegation to Officers approved by Full Council 18 October 2022.

Locally affordable homes

Councillors have been keen to ensure that homes are affordable, in relation to local incomes. This is reflected in the affordability measures such as the priority for social rents and the recommended caps on affordable rents.

Evidence

Policy ANH1 of the Waverley Local Plan Part 1 states that ‘the mix of dwelling types, sizes and tenure split should reflect the type of housing identified as being required in the most up-to-date evidence of housing needs’. The following studies were completed in 2021 and provide an update to our evidence base, now reflected in the recommendations for the mix of new provision:

- [The Waverley Housing Affordability Study \(Justin Gardner Consulting / Iceni\)](#) considers affordability for the end user
- [The First Homes Viability Update \(Three Dragons\)](#) considers the viability of delivering affordable housing to the developer, taking into account national First Homes requirements and a cap on affordable rents

² Waverley Housing Affordability Study (2021) Justin Gardner Consulting/ Iceni

³ The First Homes Viability Update (2021) Three Dragons

What was the consultation process?

The Affordable Housing Supplementary Planning Document updates were consulted on between 17 October and 28 November 2022 in accordance with the Council's Statement of Community Involvement. The Council published the Affordable Housing Supplementary Planning Document updates and accompanying documents on its website and planning policy consultation portal and placed hard copies in the Council offices and local libraries. All members of the Council's Local Plan database were notified of the consultation by email or letter. The database includes statutory consultees, Town and Parish Councils, residents' associations/groups, local businesses, developers, landowners and Waverley residents. A public notice was also placed in the Surrey Advertiser, Farnham Herald and Haslemere Herald newspapers setting out the details of the consultation and how representations could be made.

Consultees and members of the public were invited to comment via the following methods:

- Using our online consultation portal at <https://waverley.inconsult.uk>
- By email to planningpolicy@waverley.gov.uk.
- By post to Affordable Housing Supplementary Planning Document Update, Planning Policy, Planning Services, Waverley Borough Council, The Burys, Godalming, GU7 1HR.

What issues were raised?

The full representations are published on the Council's planning policy consultation portal at <https://waverley.inconsult.uk/HousingSPDUpdate/ConsultationHome>

A summary of the main issues raised and how the comments have been considered and addressed are included at Appendix A. Themes are shown in the list of contents over the page.

Why is the Affordable Housing Supplementary Planning Document being updated?	2
What was the consultation process?.....	4
What issues were raised?.....	4
How were the issues addressed?.....	5
Appendix A – Affordable Housing Supplementary Planning Document Update Consultation Responses	6
Social Rent	6
Affordable Rent Caps	8
Affordable Housing Mix.....	12
Rounding.....	15
Clustering.....	16
CIL.....	18
Locally Affordable Homes.....	20
First Homes.....	24
Viability.....	30
Affordable Housing Contacts.....	36
Commuted Sums	37
Design and Space Standards.....	38
Further comments	39
Regulation 12 – Town and Country Planning (Local Planning) (England) Regulations 2012	46

How were the issues addressed?

All representations received have been recorded, analysed and recommendations made about how they should be taken into account to inform the final SPD.

Following the consultation, the SPD has been amended to address the issues raised.

Appendix A – Affordable Housing Supplementary Planning Document Update Consultation Responses

The table below provides details of comments received and Waverley Borough Council’s response to address the issue.

✓ denotes comment noted/ agreed with/ no further action required

Social Rent

	SUMMARY OF ISSUE RAISED	HOW THE ISSUE HAS BEEN ADDRESSED?
Aster	<p>Aster Group are supportive of social rents where it is appropriate and financially viable for these to be delivered. Tenures should be secured / defined within s106 agreements at the time of granting consent to optimise delivery.</p> <p>Any restrictions on affordable rents (such as capping at 70%) should also be secured within s106 agreements to ensure these are captured within the consent and consistently applied to sites where developers offer the units for sale to the RP market.</p>	✓ Agreed.
G Fox	On suitable developments only. A poor and totally mismatched socio-economic mix could cause discord within the development. It could also have a bearing on the sale value of the non-social housing which may in turn affect the overall viability of the development	The Housing Enabling team will implement layout requirements – see clustering section
Edward Fox	[social rents for households on the lowest incomes remain a priority for the Council and should be provided on new developments whenever possible] agree	✓
Stonewater	Most developers will push for the affordable rent at 65/70% over social rent as it will provide more favourable offers for the affordable homes from Housing Associations than social rent, however I	

	SUMMARY OF ISSUE RAISED	HOW THE ISSUE HAS BEEN ADDRESSED?
	<p>understand the social rent option has been included partly to enable Housing Associations to use grant funding to convert these homes to social rent later if they wish to and funding is available.</p> <p>In order to get some social rented homes on the ‘true’ s106 element of a scheme, perhaps the Council could consider 25% s106 affordable housing on schemes which provide 100% of the s106 rented accommodation as social rent?</p> <p>Some discretion may need to be applied to sites which have already been purchased based on 80% affordable rents for a transition period after the new SPD is launched or scheme viability will be significantly affected.</p> <p>It would be useful if the definition of rents in the s106 made it clear that an annual rent increase in line with Homes England guidance is permitted, for the avoidance of doubt.</p>	<p>30% affordable housing will be required however applying a 60:40 tenure mix should improve viability. Other funding options will be explored.</p> <p>✓ Discretion to be applied during transition period. Once updated SPD is adopted, requirements re. rent levels will be known from the outset.</p> <p>ACTION: added to para 60 for clarification</p>

Affordable Rent Caps

	SUMMARY OF ISSUE RAISED	HOW HAS THE ISSUE BEEN ADDRESSED?
Abri	The proposal at paragraph 58 to cap affordable rents at the lower of LHA or 70% for 1- and 2-beds and 65% for 3- and 4-bed homes is a concerning addition to this SPD. Such a change would have clear, significant economic changes on the viability of residential development and this, the NPPF and PPG make clear, should be reserved for strategic local planning policies. The PPG states that supplementary planning documents <i>“cannot introduce new planning policies into the development plan ... [and] should not add unnecessarily to the financial burdens on development”</i> (Plan Making, paragraph 008).	Local Plan Part 1 points to latest evidence. The Housing Affordability Study 2021 and Three Dragons First Homes Viability Update 2021 are our latest evidence. The Affordable Housing SPD advises how Local Plan Part 1 should be applied, taking into account the latest evidence.
Abri	<p>The proposed new caps on affordable rented houses would have a clear and significant impact on the deliverability of affordable housing, effectively reducing the ability of the Council’s Registered Provider partners to bid for and acquire new homes.</p> <p>The introduction of this policy may have a longer term effect of dampening housebuilder interest in delivering in Waverley, with the overall effect of reducing overall delivery of affordable housing. As a matter best left for policy, we ask that this text, and the updates in the Appendices, are removed from the SPD update.</p>	Viability of lower rents at 60% of market rent has been assessed in the Three Dragons First Homes Viability Update 2021. Following consultation with affordable housing providers on our Affordable Homes Delivery Strategy, caps of 70% & 65% were agreed, to improve viability and provide two rented tenure options.

	SUMMARY OF ISSUE RAISED	HOW HAS THE ISSUE BEEN ADDRESSED?
G Fox	[Rent caps should be] higher... Affordable rents should not be seen as a cushion for life. Those in real need and on benefits already have subsidies applied to their rent so further enhancements aren't really necessary.	See Waverley Housing Affordability Study 2021.
Edward Dwyer	[We would like your views and comments on the following proposed changes: We are proposing capping affordable rents at 70% of open market rents for homes with 1 and 2 bedrooms and 65% of open market rents for homes with 3 and 4 bedrooms. Do you think these rents are about right, or should be lower or higher?] Lower. I think each case should be considered on its merits. E.g. a care worker earns a lot less than say a nurse who earns less than a train driver etc	Waverley Housing Affordability Study 2021 recommends rents in relation to local incomes.
Aster	About right... Rent levels need to be secured and defined within the s106 – so that they are applied consistently to a scheme as/when the homes are offered to the RP market.	Noted.
Stonewater	About right... This gives a good balance between affordability and preventing delivery due to viability.	✓
Haslemere CLT	Rented homes The Waverley Housing Affordability Study 2021 states at paragraph 22 “Overall, it is concluded that it would be reasonable to seek a higher level of discount than 20% from the market and it is considered that providing lower Affordable Rents (at 60% of market values, including service charges) would be a sensible starting point, subject to the viability of delivering housing at these costs.” In addition, the Waverley First Homes Viability Update modelled affordable rent at a 40% discount on market rents thereby proving the viability of various schemes with this discount. In paragraph 58 of the SPD it is stated that: “Social rents for households on the lowest incomes should be a priority. However, where this is not viable,	Social rents are our priority, however the circumstances of each site will be different. 60% rents have been assessed to be viable and following consultation with affordable housing providers on our Affordable Homes Delivery Strategy, caps of 70% & 65% were agreed, to improve viability

	SUMMARY OF ISSUE RAISED	HOW HAS THE ISSUE BEEN ADDRESSED?
	<p>affordable rents should be capped at 70% for 1 and 2 beds and 65% for 3 and 4 bed homes (including services charges) or the Current Local Housing Allowance rate for the area; whichever is lower, in order to be affordable to local households. ” It is unclear why the SPD does not suggest capping all affordable rents at 60% of market rents. We suggest in paragraph 58 the percentage is lowered to 60% for all homes. In paragraph 60 of the SPD there is a provision that suggests both social and affordable rent should be defined in Section 106 Agreements “to allow providers to deliver social rent instead of affordable rent if funding becomes available at a later date”. This makes sense but this should not allow developers to substitute affordable rented homes in place of social rented ones unless exceptional circumstances arise and changes are supported by financial viability appraisals.</p>	<p>and provide two rented tenure options.</p> <p>All changes to affordable housing amount, mix or tenure now go before Planning Committee as set out in an update to the Scheme of Delegation approved by Full Council in October 2022.</p>
Redwood Southwest Ltd	<p>The CIL Viability Study prepared in 2017, acknowledges that “Rent levels for affordable housing have an impact on residual land value”. Savills typically assumes that an affordable product, has a blended value of circa 50-60% of Open Market Value. Private developers often sell parcels of consented land to Registered Providers, who would, naturally, value affordable rented or intermediate at the higher end of the discount.</p>	<p>Once the updated SPD is adopted, our expectation is that valuations and bids will be made on the basis of the capped rents.</p>
Witley Parish Council	<p>Witley Parish Council supports the updates to the Affordable Housing SPD. In particular,</p> <ul style="list-style-type: none"> • We are pleased to see that the affordable rent has been set at 65% (3 or 4 bed) or 70% (1 or 2 bed) of market rates, with a ceiling of the local housing allowance. 	<p>✓</p>
Thakeham	<p>Thakeham seeks further clarity on paragraph 58. The Council need to include “of prevailing Market Rents” (or similar) to clarify precisely</p>	<p>“of local market rent” is used</p>

	SUMMARY OF ISSUE RAISED	HOW HAS THE ISSUE BEEN ADDRESSED?
	<p>what basis the rents are capped at. The current wording leaves ambiguity by not confirming what the 65/70% cap relates to. As well as this, the cap on Affordable Rent is typically 80% therefore, the reduction to 65/70% may increase viability concerns from new developments.</p>	
Sovereign	<p>As per our response to the Affordable Homes Delivery Strategy earlier in the year, Sovereign would support a lower rent cap, particularly for one and two beds which poses greater affordability challenges.</p>	<p>Social rents are our priority, however the circumstances of each site will be different. 60% rents have been assessed to be viable and following consultation with affordable housing providers on our Affordable Homes Delivery Strategy, caps of 70% & 65% were agreed, to improve viability and provide two rented tenure options.</p>

Affordable Housing Mix

	SUMMARY OF ISSUE RAISED	HOW HAS ISSUE BEEN ADDRESSED?
Abri	The suggested mix of affordable housing by size and tenure set out on page 23 reflects our understanding of the local needs and demands. This should remain a 'suggested' mix to allow for site-specific variation responding to needs at each scheme.	✓
Redwood Southwest Ltd	<p>Redwood conclude that the impact of altering the tenure requirements should be properly tested through the full Local Plan Review, so that a thorough assessment can be conducted, and the outcome tested. The proposition of 60% of the total affordable as social rented or affordable rents, 25% of affordable homes as First Homes, and the remaining 15% recommended as shared ownership, may have a detrimental impact on viability through the introduction of any prospect for social rents (theoretically, at up to 60%). The implications require assessment in the context of any CIL review (or future Infrastructure Levy). Thus this might only hinder the delivery of affordable units further, which means a situation of poor delivery will likely worsen, as opposed to improve. This seems to be contrary to what the purpose of this emerging SPD should be.</p> <p>3.2. Redwood's wish to highlight a key objection to this document. Principally, the change in the tenure requirement. This reflects concerns that the SPD will impact upon the delivery of affordable homes given the considerable uncertainty it will introduce into the application process both pre- and post-determination. "The overall housing target is to provide 60% of the total as social rents or affordable rents. 25% of affordable homes need to be First Homes, in</p>	<p>The updated SPD <u>reduces</u> the percentage of social rent/ affordable rent recommended within the affordable housing mix, from 70% to 60%. It has not been increased.</p> <p>AHN1 points to latest evidence (Three Dragons & Justin Gardner)</p> <p>Changes are as a result of national guidance; the Local Planning Authority has no choice.</p> <p>First Homes is a strategic planning matter and would therefore be looked at through any future review of LPP1. However, the AH SPD</p>

	SUMMARY OF ISSUE RAISED	HOW HAS ISSUE BEEN ADDRESSED?
	<p>line with the revised National Planning Policy Framework. The remaining 15% are recommended as shared ownership.”</p> <p>3.3. The remedy is either to defer the calculation, and specifics to supporting documentation to the time of a full Local Plan Review, or to make clear a lower proportion of social rent, and circumstances whereby social rent might be applicable. It is the case that the majority of schemes deliver affordable rent and shared ownership, and on the basis of the values, this still is not delivering sufficient affordable housing.</p> <p>The prioritisation of social rent and reduced levels of affordable rent might only worsen the situation.</p>	<p>is designed to provide guidance to applicants on how we will apply national policy requirements in the interim period.</p> <p>Paragraph 53 of SPD has been updated following consultation to emphasise national policy requirements (but to give flexibility)</p> <p>Viability of lower rents has been assessed.</p>
Witley Parish Council	<p>It is good to see that the housing mix specifies that 30% of the affordable rented homes and 30% of the shared ownership homes should be 3 or more bedrooms.</p> <p>Our main concern is that developers appear to have the option to ignore the “recommended” mix if they produce a viability assessment. Can the policy be strengthened so that the word “recommended” is replaced by “specified” wherever it occurs (paras 17, 54, and 57)?</p> <p>We would also question whether it is necessary to give developers alternatives to the required mix on page 51, point 19 which includes providing only 20% affordable housing, as an example.</p>	<p>We cannot prescribe a blanket policy; sites will be looked at on a case by case basis</p>
Thakeham	<p>Thakeham supports the new proposed affordable housing mix the splitting of the Affordable Housing mix reflects the latest Affordability Study and the current demand from the Council’s Housing Register.</p> <p>The wording of this document, throughout, also needs to ensure that there is sufficient flexibility to reflect the need at the time a new</p>	<p>The Affordable Housing SPD is guidance designed to give flexibility</p>

	SUMMARY OF ISSUE RAISED	HOW HAS ISSUE BEEN ADDRESSED?
	<p>scheme for development is proposed, as well as meeting the requirements of an RP.</p> <p>Thakeham supports the new proposed affordable housing tenure (60% social rents or affordable rents, 25% First Homes, 15% Shared Ownership). The Affordable Housing tenure now includes the requirement for First Homes and reflects the current need shown in the latest Affordability Study.</p>	<p>✓</p>

Rounding

	SUMMARY OF ISSUE RAISED	HOW HAS ISSUE BEEN ADDRESSED?
Abri	<p>We note the new text at paragraphs 54 and 55.</p> <p>The indication at paragraph 55 that the Council will be pragmatic in rounding the numbers of individual tenures to prioritise affordable homes to rent is supported.</p> <p>It would be useful to clarify whether the delivery of affordable housing without First Homes will be acceptable to the Council, in line with our comments above and the NPPF paragraph 63 which expects affordable housing to contribute to the objective of creating mixed and balanced communities</p>	<p>25% First Homes required in order to comply with national planning policy</p>

Clustering

	SUMMARY OF ISSUE RAISED	HOW HAS ISSUE BEEN ADDRESSED?
Abri	The update at paragraph 76 to amend reference to the delivery of clusters of affordable homes is helpful, introducing greater flexibility into this guidance.	✓
G Fox	The design and layout should be integrated as appropriate for the site as a whole. Small clusters will just define what could become ghetto areas, socially and economically divorced from the overall development	Feedback from affordable housing providers indicates that small clusters are preferred over 'pepperpotting' for housing management reasons
Edward Dwyer	Small clusters across a development could help to integrate the affordable housing with the private homes, although it can be easier to manage a scheme if Housing Association homes are closer together. Small clusters would need to be waived for any sites that are being proposed as 100% affordable.	✓
Edward Dwyer	[The Council expects the affordable homes to be distributed throughout the site in small clusters appropriate for the scale and design of the development] I agree, a mix of housing and residents is preferable. It reduces the them and us groupings.	✓
Aster	Clusters should be of appropriate size so as to facilitate the efficient management of the affordable homes and their surrounding communal areas.	✓
Stonewater	Small clusters across a development could help to integrate the affordable housing with the private homes, although it can be easier	✓

	to manage a scheme if Housing Association homes are closer together. Small clusters would need to be waived for any sites that are being proposed as 100% affordable.	
Witley Parish Council	We support the requirement to pepper-pot affordable homes throughout a site.	Feedback from affordable housing providers indicates that small clusters are preferred over 'pepperpotting' for housing management reasons
Thakeham	Thakeham supports the removal of a defined cluster of affordable homes to be more flexible and suited to the future management of plots/areas by RP's.	✓
Sovereign	Whilst unit based clusters provide a useful benchmark, some flexibility should be provided based on existing provision within the area ensuring balanced communities and the clustering is proportionate to the scale of development being delivered. Some broad guidance on percentage clusters to ensure related to scale of the scheme.	Partners have been contacted to investigate other models of good practice on clustering

CIL

	SUMMARY OF ISSUE RAISED	HOW HAS ISSUE BEEN ADDRESSED?
Abri	<p>The CIL Regulations are clear that there is no legal requirement to tie affordable housing in a s106 agreement to support an application for mandatory social housing CIL relief, except under regulation 49(7A).</p> <p>This specifically relates to condition 5 where the units are not being provided by a local housing authority or a registered provider; this is a very specific set of circumstances that may be satisfactorily managed in the general administration of the levy.</p> <p>In view of this distinct requirement, it is evidently clear it is not necessary in all other circumstances, such as where the whole site is delivered as affordable housing when the CIL Regulations permit the use of social housing relief across all units.</p> <p>We understand from the recent Affordable Housing Provider Forum that contrary to the Regulations the Council intends to seek to charge CIL on all affordable homes delivered as additionality outside S106 Agreements.</p> <p>This decision is very damaging to the Council’s aspirations to deliver more new affordable homes to meet local housing needs as it will make additional delivery unviable.</p> <p>As there is a shortfall in the delivery of affordable housing (both rented and shared ownership), it is very important to ensure that</p>	<p>The operation and implementation of the Community Infrastructure Levy (CIL) must be in CIL Regulation 2010 (as amended).</p> <p>To qualify for CIL social housing relief, sufficient evidence must be provided that the dwellings being brought forward will be qualifying dwellings in accordance with the CIL Regulation 2010 (as amended). As established by the recent case of Stonewater vs Wealdon District Council, a CIL charging authority has the flexibility to require dwellings, for which CIL social housing relief is being applied for, to be secured through aS106 agreement.</p>

	<p>additional routes to delivering outside S106 Agreements can be maintained.</p> <p>We ask that the Council reassure its RP partners that it will not seek to charge CIL on affordable housing delivered outside S106 Agreements.</p>	
<p>Redwood Southwest Ltd</p>	<p>The context in which this emerging SPD sits must be considered when assessing whether it imposed acceptable and viable requirements and guidance. WBC has adopted Community Infrastructure Levy (CIL) in October 2018.</p> <p>The CIL charging rate is one of the highest in the country ranging from £388.38-£454.15 for residential development (based on the 2022 indexation). This is a significant cost for developers which must be considered in context, noting that it is also typical for larger schemes to progress with Section 106 costs, secured in respect of site-specific matters.</p> <p>CIL and the affordable housing requirements combined could result in impacts such as, viability arguments to which seek to suppress the total affordable provision, reduced biodiversity net gain (BNG), little or no Section 106 obligations, reduced quality building materials and the loss of community infrastructure from masterplans. This, in the context that CIL may not normally be avoided, unless in exceptional circumstances.</p>	<p>As part of evidence base behind the SPD, the First Homes Viability Update considered the impact of CIL, First Homes, rent levels and tenure mix.</p>

Locally Affordable Homes

	SUMMARY OF ISSUE RAISED	HOW HAS ISSUE BEEN ADDRESSED?
G Fox	<p>Good idea.</p> <p>The definition in of Local must be firmed up so there is no incomer queue jumping by outsiders who want to work in the area</p>	<p>✓</p> <p>Please see requirements to meet eligibility criteria in Housing Allocations Policy</p>
Edward Dwyer	<p>[The Council is committed to delivering Locally Affordable Homes that local workers and households on low incomes can afford] Agreed</p>	<p>✓</p>
Aster	<p>Whilst local connection is important, it is important that homes built are occupied in timely manner.</p> <p>Local connections generally works well for rented homes.</p> <p>For low cost home-ownership homes consideration needs to be given to how local connection criteria is applied so that homes are not left empty as/when no one with a local connection comes forward.</p>	<p>✓</p> <p>✓Please see requirements to meet eligibility criteria in Housing Allocations Policy</p> <p>Waverley Borough Council will apply local connection requirements from Homes England Capital Funding Guide.</p>
GBC	<p>Whilst under the provisions of the Duty to Co-operate (referred to in https://www.gov.uk/guidance/plan-making) we would normally restrict our comments to matters of a cross-boundary nature, which the draft SPD did not present, as colleagues we have identified a few areas of the document where we felt our informal comments may be helpful.</p>	<p>Noted. This comment relates to part of the SPD that has not been updated therefore outside the scope of this consultation</p>

	<p>Paragraph 17 of Part 1 of the draft SPD states that the threshold for affordable housing contributions in ‘non-designated rural areas’ in Policy AHN1 of Local Plan Part 1 will be amended to match the NPPF’s definition for major development of 10 or more new homes or where the site has an area of 0.5 hectares or more. The paragraph then goes on to explain that, ‘<i>affordable housing is required on major developments</i>’ under the revised NPPF. This is not entirely correct, as paragraph 64 of the NPPF states: ‘<i>Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set a lower threshold of 5 units or fewer)</i>’ (our emphasis). Our understanding of this is that national policy permits affordable housing to be sought for major developments, not that it is a requirement for local plans to seek this. Further, as Waverley Borough Council’s Local Plan Part 1 is adopted and has not yet been revised, we feel that it may not be appropriate for an SPD, which provides guidance upon and cannot supersede development plan policy, to seek to amend this policy’s scope to include smaller sites.</p>	
<p>Redwood Southwest Ltd</p>	<p>Shared ownership share % Turning to a separate matter, paragraph 68 of the SPD sets an expectation that shared ownership rents should be offered at 2.5% of the value of the unsold share of the property. This is lower than the maximum of 3%, and the recommended 2.75% upon first sale, that is set out in Homes England’s Capital Funding Guide for shared ownership homes. As with the Council’s approach to affordable rented housing, this lower proportion of rent can affect development values and Registered Providers’ ability to fund their future business activity. We recommend that the figure of 2.5% is amended to 2.75% for consistency with Homes England’s own guidance for the shared ownership model.</p>	<p>S106 affordable housing requirements do not receive Homes England funding. Homes England guidance is national, but affordability issues in Waverley are unique. The 2.5% rent on remaining equity is not a new update to the SPD; this was included in the original SPD adopted April 2021; based upon exceptionally high open market values in Waverley.</p>

Sovereign	This should not just be driven by the housing register but also utilising help to buy data for shared ownership. It should also recognise the new shared ownership model allowing buyers to enter at 10% shares where grant attached.	<p>References to shares from 25% amended to 10%.</p> <p>References to Help to Buy Agent removed</p>
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First Homes

	SUMMARY OF ISSUE RAISED	HOW HAS ISSUE BEEN ADDRESSED?
Abri	<p>The First Homes Viability Update 2021 suggests that the introduction of First Homes will not adversely affect the viability of residential development across the Borough, nor the overall level of affordable housing delivery.</p> <p>However, this also shows that the level of rented affordable homes, the discounts on market rents, and the numbers and sizes of shared ownership homes will need to be changed to accommodate this tenure.</p> <p>As noted in the Viability Update and Affordability Report, the market for First Homes units is limited to smaller units and the inclusion of this tenure will directly affect the price paid per rented and other low cost home ownership units.</p> <p>This gives rise to genuine concern that the evidence does not support the inclusion of this tenure within the general affordable housing mix on all schemes and should be limited.</p>	<p>25% First Homes required by national planning policy.</p>

Edward Dwyer	Sorry this is too complicated for me to provide a valid answer.	✓
Abri	Where First Homes would not be the most effective mechanism for meeting local needs, the Council should look to support a more targeted mix, such as reinstating the proportion of shared ownership	25% First Homes required in order to comply with national planning policy.
G Fox	Agreed	✓
Aster	First Homes may appeal to a niche market only – additional criteria may further limit the households who can purchase the homes, which is undesirable.	✓
Stonewater	I have no comments on this section as we do not provide First Homes as a Housing Association (on a standard s106 scheme the developer would provide these and on 100% affordable schemes I understand that there is no First Homes requirement).	✓
Haslemere CLT	As a Community Land Trust our aim is to deliver affordable homes that remain affordable in perpetuity, we therefore welcome the addition of First Homes as an affordable housing option because the percentage discount from market value is preserved for future sales.	✓
Haslemere CLT	It is unfortunate that viability testing has not included testing at discounts above 30% of market value for First Homes. The Waverley First Homes Viability Update found that all schemes tested were viable so it is possible higher discounts on some First Homes could be offered which could enable some 3 bed homes to be provided. Paragraph 74c) refers to the Housing Allocation Policy but it is	The Affordability Study suggested a larger discount would reduce subsidy available for other tenures such as social rent, for which there is

	<p>unclear which document this is. Is it the Housing Allocation Scheme May 2020? We suggest a link to the Policy is added to this SPD.</p>	<p>greater need. Therefore, it has been concluded that a larger discount is not desirable.</p> <p>Link to Housing Allocations Policy added to SPD</p>
<p>Redwood Southwest Ltd</p>	<p>Private developers may soon have to factor 25% provision of First Homes (at circa 70-80% of Open Market Value). The provision is First Homes is not thought to be of interest to Registered Providers, and thus private developers will need to factor within the cashflow assumptions the market sale of a greater proportion of properties on site. WBC should be mindful of the delivery implications arising.</p> <p>It is worth highlighting that the sale of First Homes units after a discount must be under £250,000, thus this is likely to result in a high number of smaller units notably one beds. This is the result of limited affordability in the Borough, such as the Housing Affordability Study (December 2021) states “Waverley is an expensive area to buy housing with the average (median) price of a home in 2020 being £500,000; this is nearly double the average for England (£259,000)”. It will also be impossible to deliver 3 bedroom houses as the discount would be so significant to keep within the cap as to render delivery unviable. This only</p>	<p>Response highlights important points re. national First Homes policy</p>

	<p>serves to underline the wider policy failure to address housing supply in Waverley and moderate house prices in general.</p> <p>If circa 25% of the affordable units were one beds, this would result in a high proportion of one bed units. It is possible there will not be demand for this level of one beds and in this instance, would not reflect the needed housing mix in the Borough as per the SHMA / SPD or offer a varied and sustainable community. There should be flexibility added to the SPD that would allow for the First Home provision to be judged on a case-by-case basis and the provision of affordable housing including First Homes, to be negotiated and agreed with WBC via Section 106.</p> <p>It is also not yet clear how the First Homes will be delivered and work in practice in the borough. As Local Plan Part 2 (LPP2) is silent on First Homes, it might be opportune to revisit the implications and implementation of First Homes to the full Local Plan Review due in February 2023.</p>	<p>First Homes is a strategic planning matter and would therefore be looked at through any future review of LPP1. However, the AH SPD is designed to provide guidance to applicants on how we will apply national policy requirements in the interim period.</p>
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<p>McCarthy Stone</p>	<p>Add a new para after para 70 to read: Some forms of specialist accommodation will be exempt from providing First homes in line with para 65 of the NPPF. These exemptions include Build to Rent homes; specialist accommodation e.g. older people or students; people who wish to build or commission their own homes and schemes which are exclusively for affordable housing.</p>	<p>C2 or C3 distinction is relevant here. We will continue to require affordable housing on C3 older persons' housing schemes</p>
<p>Thakeham</p>	<p>Thakeham supports the inclusion of the First Homes Policy, which is a National Policy and complies with the definition of Affordable Housing in Annexe 2 of the National Planning Policy Framework.</p>	<p>✓</p>
<p>Sovereign</p>	<p>"Governments aspirations for First Homes was first set out in the Written Ministerial Statement dated 24th May 2021 and supplemented by further guidance in the National Planning Practice Guidance (23 December 2021). Since December 2021 the requirement of First Homes have not be expanded within the Framework or primary policy.</p> <p>Due to the wording of the Written Ministerial Statement, it has been implied that First Homes is a mandatory requirement necessitating that 25% of all affordable housing secured through developer contributions must be First Homes. This is not the case. Many local planning authorities have taken this requirement as read and not sought to question it further.</p>	<p>25% First Homes required in order to comply with national planning policy.</p> <p>First Homes is a strategic planning matter and would therefore be looked at through any future review of LPP1. However, the AH SPD is designed to provide guidance to applicants on how</p>

	<p>Sovereign urge the Council to update the SPD to introduce a degree of flexibility with affordable home ownership products and in particularly the application of First Homes.</p> <p>Due to the high values within Waverley First Homes are only likely to be a feasible product for 1 and 2 bed properties, predominantly flats, and therefore mix aspirations should reflect this. Greater flexibility of other affordable home ownership products should also be considered to ensure a wider group of affordable need is addressed.</p> <p>As noted previously, the SHMA has not be updated since 2015 and along with wider local plan policies the viability of First Homes has not been fully considered."</p>	<p>we will apply national policy requirements in the interim period.</p> <p>Viability of First Homes has been assessed in the First Homes Viability Update 2021 (Three Dragons)</p>
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Viability

	SUMMARY OF ISSUE RAISED	HOW HAS ISSUE BEEN ADDRESSED?
G Fox	Agreed. Once the decision has been made and PP granted any subsequent application to reduce the affordable housing allocation should be rejected as matter of course. Viability of the site is the remit of the Developer not the Council.... I feel very strongly that once the AH allocation has been set as part of the original PP it should be cast in stone and not seem to be open to ongoing reduction as has happened only too often in Waverley. It is up to the developer to take account of this at the time he purchases the site and progresses the design. Lack of Viability due to poor and inadequate research and preplanning should not be of concern to the council	✓
Edward Dwyer	[All applications which seek to amend or reduce the affordable housing requirement on the basis of viability will be taken to Planning Committee] This seems fair.... Totally agree	✓
Aster	Agree	
Haslemere CLT	Amendments and reductions to affordable housing In Haslemere, we have witnessed developers submitting planning applications that fail to meet LPP1 policy AHN1 and are concerned that changes can be made to the quantity and type of affordable homes in a scheme, after planning permission has been granted. We therefore support the added provision in paragraph 85 that: "All applications which seek to amend or reduce the affordable housing requirement on the basis of viability will be taken to Planning Committee." The council should ensure Developers support every viability assessment by providing the evidence listed in Appendix 2 of the SPD. Even amendments that increase the amount of affordable homes	✓

	<p>offered should be thoroughly reviewed, especially those on greenfield sites where profits are potentially much higher.</p>	
<p>Bewley</p>	<p>Unfortunately, the Council appears to be taking a different approach with the draft updates to the SPD. At Paragraph 58 on Page 25 of the draft the Council suggests that all schemes should include Social Rent unless a viability test is passed. This approach, to introduce a viability test to differentiate between affordable tenures is not supported by National policy in the Framework nor the PPG. In fact the Council has no basis whatsoever to seek to introduce such a requirement when the Government position is clear that Affordable Housing can comprise one or more of the types identified in Annex 2 of the Framework. At no point does the Government stipulate that a particular tenure should take precedent over another.</p> <p>2.7 In fact the Council's own adopted Development Plan Policy (Policy AHN1) contains no support for the introduction of a mandatory level of Social Rent and instead seeks a reflection of the type of housing as being required in the most up-to-date evidence. A 'reflection' of the type of housing required is not a mandatory requirement.</p> <p>2.8 The underlying evidence base relied upon by the Council, particularly the Waverley Affordability Study 2021 prepared by Justin Gardiner Consulting, again provides no support for the approach being taken by the Council. In fact Paragraph 6.2 confirms that the report does not give the answers in terms of how affordable housing should be delivered. Paragraph 6.3 goes on to advise the Council that it will be important to have a clear view about what is viable in a local context.</p> <p>2.9 There is no evidence presented by the Council to demonstrate how it has considered viability particularly in relation to the draft proposal for Social Rent and the proposed caps to Affordable Rent. A viability assessment is essential to ensure that the proposed updates are realistic and will be deliverable. In fact the Justin Gardiner Consulting report makes this exact point in Paragraph 6.3.</p>	<p>Viability Assessments are only required when the policy requirement of AHN1 are not being met</p> <p>The SPD does not require a mandatory level of social rent. The recommendations in the SPD are based upon the latest evidence (2 studies). AHN1 points to latest evidence.</p> <p>SPD is intended as guidance; designed to give flexibility.</p> <p>Viability of Affordable Rent caps has been assessed in the Three Dragons First Homes viability update.</p>

	<p>2.10 Bewley Homes has serious concerns with the approach the Council is taking in relation to the updates to the SPD. The answer to improving affordability within the Borough lies primarily through increased delivery of new homes, which is a matter the Council needs to tackle urgently through a review of the LPP1 and not through updates to an SPD that have not been properly tested and will be unlikely to deliver the real step change in affordability and delivery of affordable homes that the Borough so desperately --</p>	<p>Housing delivery is a strategic planning matter and would therefore, be looked at through any future review of Local Plan Part 1.</p>
<p>Redwood Southwest Ltd</p>	<p>2.3 The CIL Viability Study prepared in 2017, acknowledges that “<i>Rent levels for affordable housing have an impact on residual land value</i>”. Savills typically assumes that an affordable product, has a value of circa 50-60% of Open Market Value. Private developers often sell parcels of consented land to Registered Providers, who would, naturally, value affordable rented or intermediate at the higher end of the discount.</p> <p>2.4. In addition, private developers may soon have to factor 25% provision of First Homes (at circa 70-80% of Open Market Value). The provision is First Homes is not thought to be of interest to Registered Providers, and thus private developers will need to factor within the cashflow assumptions the market sale of a greater proportion of properties on site. WBC should be mindful of the delivery implications arising.</p> <p>2.5. The Affordable Housing SPD presently poses a risk in undermining the viability of development proposals in the borough, which in turn will mean that other planning benefits are not provided. As an example, CIL and the affordable housing requirements combined could result in impacts such as, viability arguments to which seek to suppress the total affordable provision, reduced biodiversity net gain (BNG), little or no Section 106 obligations, reduced quality building materials and the loss of community infrastructure from masterplans. This, in the context that CIL may not normally be avoided, unless in exceptional circumstances.</p> <p>2.6. The impact of effectively reducing the number of shared ownership homes in a scheme as a result of First Homes policy will result in affordable</p>	<p>Once the updated SPD is adopted, our expectation is that valuations and bids will be made on the basis of the capped rents.</p> <p>First Homes is a national policy.</p> <p>As part of evidence base behind the SPD, the First Homes Viability Update considered the impact of CIL, First Homes, rent levels and tenure mix.</p>

	<p>housing providers having less scope to cross subsidise social/affordable rented housing. Combined with the further proposal to reduce affordable rents to 65- 70% of Open Market Value this compounds viability issues and there is no robust evidence from the Council that demonstrates affordable housing delivery will not be impacted. It is a serious flaw of the current consultation that a fully worked up financial viability study has not been undertaken.</p> <p>2.8 It seems clear to us that more and more planning applications will need to be accompanied by viability reports, making planning decisions more challenging and slowing down housing delivery, with no obvious upside to the new policy if affordable housing delivery is negatively impacted.</p>	<p>See First Homes Viability update.</p> <p>Comment noted.</p>
<p>Redwood Southwest Ltd</p>	<p>3.6. Whilst the Council’s desire to increase the delivery of social rented housing (or secure greater discounts against open market rents than the 80% of Affordable Rent) is understandable, it is important to recall that Affordable Rent enables affordable housing to be delivered with less reliance on scarce public subsidy, and enables the Registered Provider to generate a greater return to be reinvested in their core activities of providing affordable housing, when compared with social rent.</p> <p>3.7. Paragraph 58 implies that social rented housing should be prioritised and only where it is not viable should the Council consider alternative rent levels. This appears to place a requirement upon the applicant to demonstrate viability (or a lack thereof) and to have potentially secured grant funding if they seek to deliver affordable housing at anything other than social rent. It is common practice that policy-compliant levels of development do not need to provide a viability report. The requirement as set out goes beyond the requirement of policy AHN1. In practice, if this is adopted, this will place all applicants at the extra cost and time of commissioning viability evidence; and will place the Council at the additional cost and time of reviewing that evidence. In doing so, this creates barriers to development and could slow or inhibit the delivery of much-needed affordable housing.</p>	<p>Viability Assessments are only required when the policy requirement of AHN1 are not being met</p>

	<p>3.8. Moreover, it also increases the uncertainty and planning risk in the planning process for the applicant since they must make a viability argument even where their proposals are otherwise compliant with policy AHN1. For Registered Providers in particular, who typically operate on a non-profit basis (or reinvest profits into more affordable housing), this could harm their ability to compete in the land market against commercial players, due to their reduced appetite for risk.</p> <p>3.9. Overall, we hold significant concerns about the SPD's provisions that will affect the viability of development, the ability of registered providers to fund their future business activity (which includes the ongoing provision of more affordable homes) and the creation of additional 'hurdles' that must be overcome through the planning application process. Whilst the aim of these measures is laudable there is a risk they will simply inhibit or delay the delivery of affordable housing as an unintended consequence. We recommend that the additional text at paragraph 58 is deleted; and reference to social rent at paragraph 54 is deleted. The most appropriate place for matters of rent levels in particular is through the Development Plan, when the impacts upon viability can be considered in the wider context of what is achievable and viable.</p>	<p>The SPD does not require a mandatory level of social rent. The recommendations in the SPD are based upon the latest evidence (2 studies). AHN1 points to latest evidence.</p> <p>Rents at 60% have been assessed to be viable in the Three Dragons First Homes Viability Update 2021 (part of the remit of which was to assess viability of reduced rents as well as the implications of First Homes)</p>
<p>Redwood Southwest Ltd</p>	<p>Housing Affordability Study (December 2021)</p> <p>4.1. This document has been prepared to provide analysis of the affordability in WBC, to inform the housing strategy.</p> <p>4.2. Whilst this report does not focus on need, there is an evident overall need for affordable homes in the borough. It is also clear that this document does not focus on viability itself, it says: <i>"it will be important for the Council to have a clear view about what is viable in a local context. The Council will also need to form a view about how to deal with situations where viability is an issue. This essentially means making a decision between providing a quantum of affordable housing or a better quality offer (i.e. more affordable to the end user). For example, if affordable rents at 60% are not viable for</i></p>	<p>Rents at 60% have been assessed to be viable in the Three Dragons First Homes Viability Update 2021 (part of the remit of which was to assess viability of reduced rents as well as the implications of First Homes)</p> <p>The Affordable Housing SPD is guidance. The Housing Enabling team will continue</p>

	<p><i>the number of units required, does the Council reduce the number of units or increase the proportion of the market rent?”</i></p> <p>4.3. Redwood agrees with the statement above provided by J G Consulting, to advise WBC. However, it is not clear that GBC have considered this advice or shown that they have responded to it in any of their consultation material. In the SPD update, part three is on viability and the only update appears to relate to applications which seek to reduce the affordable housing requirement will be taken to planning committee.</p>	<p>to consider specific sites on a case-by-case basis.</p>
<p>McCarthy Stone</p>	<p>PPG addresses Supplementary Planning Documents and at Paragraph: 008 Reference ID: 61-008-20190315 states that ‘Supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development’.</p> <p>We would also remind the Council of the role of viability testing in relations to Local Plan’s in Paragraph 58 of the NPPF and that the PPG states that “<i>The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan</i>” (Paragraph: 002 Reference ID: 10-002-20190509).</p>	<p>As part of the evidence base behind the SPD, the First Homes Viability Update considered the impact of CIL, First Homes, rent levels and tenure mix.</p> <p>The SPD is designed to provide applicants with guidance on how the AH policies in LPP1 will be implemented and the new First Homes requirement.</p>
<p>Thakeham</p>	<p>Paragraph 52 states “Providers should pay developers in the range of approximately 30% to 70% market value”. Firstly, it is questioned whether it is appropriate for an SPD to be dictating commercial terms between a developer and an RP. Whilst ‘should’ suggests some flexibility there is potentially some ambiguity on how this is phrased</p>	<p>The Affordable Housing SPD is guidance. The Housing Enabling team will continue to consider specific sites on a case-by-case basis.</p>

	and there is, as a minimum, a need to include “subject to prevailing values, unit type and tenure, providers would be expected to pay...”.	
Sovereign	Sovereign support the Councils proposed policy to refer schemes subject to viability assessment to Planning Committee. Assessing development viability is now an integral part of planning and should become part of normal planning practice. We would encourage the Council to seek in-house expertise in respect to assessing open book development viability, noting the delay and cost associated with independent assessments.	✓

Affordable Housing Contacts

	SUMMARY OF ISSUE RAISED	HOW HAS ISSUE BEEN ADDRESSED?
Abri	<p>The list of affordable housing developer contacts on the Waverley website currently lists Radian.</p> <p>It would be useful to have this updated to the new name and Abri email address, with the same wording as for other providers, noting Abri as a general needs provider developing larger sites of typically 20+ affordable homes.</p>	<p>Noted</p> <p>Web page amended</p>

Commuted Sums

	SUMMARY OF ISSUE RAISED	HOW HAS ISSUE BEEN ADDRESSED?
McCarthy Stone	<p>The SPD should also clarify that certain specialist housing schemes such as those meeting the needs of older people should be exempt from providing affordable housing on site and that a financial contribution will be acceptable instead. This is because specialist housing for older people is often delivered on smaller sites of up to 50 units in central sustainable locations where it would not be viable to deliver on site affordable housing. In addition, it is often not appropriate to mix affordable housing in specialist housing schemes for older people which by their very nature are based around communal facilities and communal living and delivered on smaller sites. This would ensure the SPD is consistent with both national policy and the SPD’s own evidence and to ensure that the SPD proposed changes do not <i>add unnecessarily to the financial burdens on development</i>.</p> <p>Therefore add to the end of para 103 to read: A commuted sum will also be accepted for schemes delivering specialist accommodation such as housing for older people.</p>	<p>C2 or C3 distinction is relevant here. We will continue to require on-site affordable housing on C3 older persons’ housing schemes.</p>
Witley Parish Council	<p>We support the statement in CI 110: “On-site provision of affordable housing will be required and only in exceptional circumstances (which are listed) will an alternative to on-site provision be considered”.</p>	<p>✓</p>

Design and Space Standards

	SUMMARY OF ISSUE RAISED	HOW HAS ISSUE BEEN ADDRESSED?
Thakeham	<p>Thakeham seeks further clarification on Paragraph 78. Whilst Thakeham supports that Affordable Homes should meet the Nationally Described Space Standards, the standards do not separate between affordable ownership and affordable rented. Therefore, clarity/ amendment is needed to explain why 3b5p is not acceptable for affordable rented if the unit still meets the 93sqm standard. This amendment limits options on unit types thereby deterring some RP's and there should be more flexibility around such provision.</p> <p>Thakeham supports the inclusion of the new minimum floor area for 4-bed houses which was omitted from the current Affordable Housing SPD.</p>	<p>ACTION: Further clarification added to para 77</p>

Further comments

	SUMMARY OF ISSUE RAISED	HOW HAS ISSUE BEEN ADDRESSED?
CW and BA Wicks	<p>Sir</p> <p>If you have every sat in your car (in Farnham SOUTH STREET, WAVERLEY ROAD. TILFORD ROAD. AND THE A31 EAST AND WEST) you will have no doubt the problem is the Farnham RAILWAY STATION GATE CLOSURES due to long 14 carriages mainly going back and forth all most empty, approximately every 5 /6 minutes where the gates are closed for so long, it has become unbearable.</p> <p>So until that and other road, schools, surgeries, hospitals, and all the other services that have now become a pain to live in Farnham. New housing (all types) should be put on hold until all the new builds sitting unoccupied, and those with planning permission that are not being built should be seriously considered .</p> <p>Therefore it is a BIG NO to SPD. It would be nice to see the outcome, because I cannot believe there is more room in Farnham for more house building.</p> <p>Regards CW & BA Wicks</p>	<p>Comment noted however not within the scope of this consultation.</p>
Edward Dwyer	<p>Not really other than to say it is essential we get more AH in the borough to attract the necessary skills required in our hospitals, schools etc</p>	<p>✓</p>
Aster	<p>The SPD should set out clearly what the Councils expectations are - these should then be secured in each and every consent in detail so that rent caps etc are stipulated within s106 agreements.</p>	

	<p>The SPD should also set out the Council's approach to securing additional affordable homes on sites. Will such homes be supported and receive CIL relief, and how will the council ensure their requirements placed on these homes do not conflict with an RPs ability to apply Homes England Grant.</p>	<p>The Affordable Housing SPD flows from Local Plan Part 1, which does not contain a policy on additional affordable homes, therefore the SPD does not cover this topic. The Housing Enabling team will continue to work in partnership with affordable housing providers to optimise new affordable housing, including through additionality.</p>
Cranleigh Parish Council	<p>The Parish Council SUPPORTS the Affordable Housing Supplementary Planning Document.</p>	<p>✓</p>
Haslemere CLT	<p>Enforcement We are pleased to see, at paragraph 34, the intent to ensure planning obligations are met: "the Council will consider all options including enforcement to remedy the solution." However, this provision could be improved by listing example of the options available rather than stating "all options"</p>	<p>The Council cannot fetter its discretion by listing options</p>
Bewley	<p>As a starting point it is important to note that Waverley Borough is an inherently unaffordable place to live. In fact the latest Affordability Ratio data published by ONS on 23 March 2022 confirms that Waverley is the least affordable local planning authority area outside of London in the country with a median workplace based ratio of 18.32. That is significant. The consequence of such a high ratio is that more of the population are forced out of the open market within Waverley. This further increases the amount of need for affordable homes to be provided. There is no question</p>	<p>✓</p>

	<p>that affordable housing should be a key corporate priority for the Council and that each housing development that meets the necessary thresholds should make an appropriate contribution towards that need. It is important to understand why Waverley is so unaffordable. The simple answer to this is the extensive history of under delivery within the Borough dating back over at least the last 10 years. The Council has been in a continual cycle of not being able to demonstrate a rolling 5- year housing land supply, which has just be reconfirmed in its latest 01 April 2022 based housing land supply position statement</p> <p>A substantial part of the solution is therefore to deliver more housing across the Borough on sites that meet the threshold requirements set out in the adopted Local Plan Part 1 and therefore are able to deliver onsite affordable homes.</p>	
<p>Rushmoor Borough Council</p>	<p>No comments to make but please continue to notify us of future consultations</p>	<p>✓</p>
<p>Redwood Southwest Ltd</p>	<p>Affordable housing delivery Affordable housing delivery in Waverley is already low. It seems clear to us that more and more planning applications will need to be accompanied by viability reports, making planning decisions more challenging and slowing down housing delivery, with no obvious upside to the new policy if affordable housing delivery is negatively impacted.</p> <p>These changes should be through Local Plan review and not SPD</p> <p>3.4. Through the draft SPD and particularly paragraph 57, the Council is setting rent requirements that go well above and beyond the remit of adopted policy AHN1 ‘Affordable Housing on Development Sites’. Furthermore, the delivery of social rented homes, or homes at rents capped at 65% to 70% of open market rents, inevitably affects development viability. It is a long-held principle that Supplementary Planning Documents must not create development plan policy ‘by the back</p>	<p>Local Plan Part 1 points to ‘latest evidence’ – the updated Waverley Housing Affordability Study and First Homes Viability Update are the latest evidence. The SPD does not create policy but reflects national policy changes over which local authorities have no control or choice.</p>

	<p>door’ but the emerging SPD extends its reach considerably beyond that set out in policy AHN1 (which does not prescribe the tenure mix to be sought) by setting prescriptive expectations on tenures and rents that can affect development viability. Planning applications should be determined in accordance with the adopted policy, and whilst a SPD can be a material consideration, such divergence from adopted policy as prescribed, will inevitably hinder the determination of otherwise policy compliant planning applications.</p> <p>3.5. Planning Practice Guidance also confirms that SPDs should “not add unnecessarily to the financial burdens on development” (Paragraph: 008 Reference ID: 61-008-20190315). Since development must address sometimes competing priorities (including affordable housing, quality of design, CIL contributions, biodiversity net gain, amongst other important matters) the correct place for viability to be considered is through the Development Plan where those priorities can be considered in the round.</p> <p>Taking planning applications to Committee Paragraph 85 of the Draft SPD indicates that any application which departs from the tenure requirements set out in the SPD will be considered by the Planning Committee. This reason alone would mean <i>any</i> application that does not provide the expected amount of social rented dwellings could be presented to the Committee (particularly those on smaller sites which the Council can deal with efficiently under delegated powers) even if it complies with adopted policy AHN1 as a whole. This again increases the planning risk for applicants; leaving affordable housing matters aside, the Committee can take a contrary view to officers on any aspect of a proposal and can refuse permission even where officers recommend approval. Ultimately, this could result in sites being brought to Planning Committee on affordable housing grounds (even where they comply with the Development Plan) but being refused on other matters. We recommend that the proposed additional sentence to paragraph 85 is deleted.</p>	<p>25% First Homes required by national planning policy</p> <p>This is not a new requirement in the SPD, but had been included for clarity. The requirement to take to planning committee was added to the Waverley Scheme of Delegation to Officers (approved by Full Council 18 October 2022) ACTION: Amended para 85 to change to all applications will be dealt</p>
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		with in accordance with the Scheme of Delegation
Natural England	We have checked our records and based on the information provided, we can confirm that in our view the proposals contained within the plan will not have significant effects on sensitive sites that Natural England has a statutory duty to protect.	✓
National Highways	We have reviewed this consultations and associated documents and have 'No Comments'.	✓
McCarthy Stone	<p>Need for and benefits of older person's housing</p> <p>There will be a significant increase in older persons' projected and the provision of suitable housing and care to meet the needs of this demographic should be a priority of emerging SPD.</p> <p>Older peoples housing produces a large number of significant benefits which can help to reduce the demands exerted on Health and Social Services and other care facilities.</p> <p>Retirement housing releases under-occupied family housing and plays a very important role in recycling of housing stock in general. There is a 'knock-on' effect in terms of the whole housing chain enabling more effective use of existing housing.</p>	<p>We do not dispute the benefits of affordable housing for older people. The SPD relates to affordable housing, not private market housing. Older people's housing needs are already addressed in LPP1. Planning for older people's needs to be addressed as part of any Local Plan Review. SPD cannot create policy. Downsizing is addressed in the Affordable Homes Delivery Strategy action plan</p>
McCarthy Stone	In addition, we note that some related information refers to the draft Waverley Borough Council Climate Change and Sustainability Supplementary Planning Document which was consulted upon earlier in the year. With any revised SPD, the opportunity should be taken to assess the viability, and in this case the viability of the suggested sustainability	Viability assessment takes into account all requirements including climate change

	<p>initiatives if the climate SPD is going to be progressed as the climate change SPD does not do this itself. This would be in accordance with PPG para Paragraph: 001 Reference ID: 10-001-20190509 'These policy requirements should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies, and local and national standards, including the cost implications of the Community Infrastructure Levy (CIL) and section 106'.</p>	<p>Outside the scope of the Affordable Housing SPD updates consultation</p>
Historic England	<p>Historic England has no specific comments to make on the above document but would advise that the Council's own conservation staff are closely involved in its preparation, as they are often best placed to advise on local historic environment issues and priorities, sources of data and, consideration of any matters relating to the historic environment.</p>	<p>✓</p>
Witley Parish Council	<p>Witley Parish Council supports the updates to the Affordable Housing SPD.</p>	<p>✓</p>
Thakeham	<p>Thakeham supports paragraph 66 however, the Council need to add to the last sentence "unless a waiver is agreed by Homes England". This removes any potential conflict if there are changes by Homes England.</p> <p>Thakeham supports the removal of the affordability ratio and the number of households waiting on Waverley's Housing Register for affordable or social rented housing. Whilst the removal from the SPD is sensible as the document is unlikely to be updated yearly (for most up to date figures), the Council should make sure that these figures are then reported in the Annual Monitoring Report, as it is important to understand the latest situation with regard to affordability and those waiting for affordable homes.</p>	<p>ACTION added to para 65 "unless a waiver is agreed by Homes England".</p>

<p>Haslemere CLT</p>	<p>Enforcement We are pleased to see, at paragraph 34, the intent to ensure planning obligations are met: “the Council will consider all options including enforcement to remedy the solution.” However, this provision could be improved by listing example of the options available rather than stating “all options”.</p> <p>Paragraph 74c) refers to the Housing Allocation Policy but it is unclear which document this is. Is it the Housing Allocation Scheme May 2020? We suggest a link to the Policy is added to this SPD.</p>	<p>Worded in this way based upon legal advice to ensure that the Council does not fetter its discretion.</p> <p>ACTION added hyperlink to para 73 (c)</p>
<p>Sovereign Housing Association</p>	<p>The Councils latest Annual Monitoring Report confirms the Borough have delivered 754 (gross) affordable homes since 2013, just under 22% of all supply against a target of 30%. To ensure local affordable need is being met it is important other forms of affordable supply are acknowledged.</p> <p>With reference to Funding of Affordable Homes on Page 23, the SPD could provide further commentary around “with grant” provision of affordable housing, the benefits this can bring to meeting local needs and how the Council will support additionality and/or all affordable schemes made possible through maximising RP’s access to grant such as through Homes England strategic partnerships.</p> <p>Sovereign are keen to deliver new affordable homes in the Borough championing our Homes and Place standard and would be happy to work closely with the Council.</p>	<p>✓</p>

Regulation 12 – Town and Country Planning (Local Planning) (England)

Regulations 2012

This consultation statement has been prepared in accordance with Regulation 12(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012, which states that before a local planning authority adopts a supplementary planning document it must prepare a statement setting out:

- i. The persons the local planning authority consulted when preparing the supplementary planning document;
- ii. a summary of the main issues raised by those persons; and
- iii. how those issues have been addressed in the supplementary planning document.

This statement sets out who was consulted in the preparation of the draft Supplementary Planning Document: Affordable Housing, how they were consulted, what issues were raised and how those issues influenced the preparation of the document.

The Local Plan Regulations set out that LPAs should make the document 'available' for a minimum of four weeks. During such time, the document should be made available for inspection at the council offices and other appropriate locations, and should be published on the local planning authority website.

Regulation 13 states that any person may make representations about the SPD and that the representations must be made by the end of the consultation date referred to in Regulation 12.

As set out in Regulation 12 when seeking representations on an SPD documents must be made available in accordance with Regulation 35; which requires the Council to make documents available by taking the following steps:

- (i) make the document available at the principal office and other places within the area that the Council considers appropriate;
- (ii) Publish the document on the Council's website.



Equality impact assessment form

Information about the person completing this assessment

Name: Esther Lyons

Job title: Housing Strategy & Enabling Manager

Service area: Housing Strategy & Enabling

Email: esther.lyons@waverley.gov.uk

Date completed: 04/08/2022

Section 1 – what is the policy or activity trying to achieve?

Describe the policy/strategy/procedure/function which is the subject of this impact assessment.

The Affordable Housing SPD sets out WBC's expectations of housing associations and developers regarding affordable housing provision on development sites.

What outcomes are wanted from this policy/activity (what are you trying to achieve)?

An updated supplementary planning document (SPD) on affordable housing, to provide applicants with more detail on how affordable housing should be provided in line with policies AHN1 and AHN2 of the adopted Waverley Local Plan (part 1). The updates to the SPD are all either as a result of national policy changes, or in line with our Affordable Homes Delivery Strategy.

The equality impact of national policy, e.g. the 25% First Homes requirement or the 10% affordable homeownership requirement, are not assessed in this EqIA. This is because as a local authority we are required to implement national policy requirements. We have little scope to change them. Our view, however, is that these national policy changes do not have a positive impact on equality. The Government is pushing homeownership as the preferred tenure at the expense of social rented housing, the tenure that is most needed to meet the needs of low income and vulnerable households.

In an attempt to mitigate this negative impact and in line with updated needs evidence, the revised SPD will require a reduction in Affordable Rent levels from 80% of market rent to 70% (1 and 2 beds) and 65% (3 and 4 beds). It is anticipated that this will have a positive impact on equality (see below).

Who is affected by this policy/activity?

- Households in housing need including low income households
- Older people
- Younger people
- Women, including young pregnant women
- Households with disabilities
- LGBTQ+ households
- Gypsy and Traveller households seeking settled accommodation in the form of social housing
- Tenants of affordable housing seeking to transfer
- Housing associations
- Developers

Who are the main people involved in this activity?

Households in housing need are the end-users of affordable housing. The Housing Strategy and Enabling Team, Planning and Legal teams are involved in implementing and enforcing the guidance in the SPD. Those involved in delivering affordable housing are the Housing Strategy and Enabling Team, Housing Development Team, housing associations, developers, Town and Parish Councils, Surrey County Council Adult Social Care Commissioning Team, Homes England, the Surrey Rural Housing Enabler and local community groups.

Is the responsibility for the proposed policy/activity shared with another department, authority or organisation? If so, what responsibility and with whom is it shared?

No.

Section 2 – Information gathering and consulting stakeholders

Do you have any monitoring data available on the number of people (from protected characteristic groups) who are using or are potentially impacted upon by your policy/activity?

Data from Waverley Housing Affordability Study, Strategic Housing Market Assessment, WBC tenant profile, JSNA 2013; Census 2011; ASC Commissioning: Statement Accommodation with care, residential & nursing care for older people, 2019.

The data on our growing elderly population supports the action to develop suitable housing for older people, including Extra Care and dementia specialist housing.

The proportion of women and ethnic minority groups living in social housing in Waverley is higher than the proportion of women and ethnic minority groups who live in the borough, reflecting the nationwide trend that women and ethnic minority groups are more likely to access social housing.

Waverley BC tenants – protected characteristics

- 35% of tenants are aged 65 or above
- 25% have recorded a disability
- 60% of tenants are female
- 90% of tenants are white British
- 30% of tenants provided information on their sexual orientation:
 - 3% of tenants who provided information identify as LGBTQ+ (0.9% of all tenants)
 - 94% of residents who provided information identify as heterosexual (28.2% of all tenants)

Waverley BC tenants – socio economic disadvantage

- 17% of tenants receive full housing benefit
- 23% receive Universal Credit
- 40% of tenants do not receive any benefits for housing costs
- 20% receive partial housing benefit

Older people

The 2011 Census shows us that the total population in Waverley is 121,572, of which 49% are men and 51% are women. Approximately 20% of people are older adults, aged 65 years and older, with 3.2% of people aged 85 years and over. 51% of Waverley's economically inactive

population is retired. 14% of households are occupied by people over 65 living on their own. Waverley has the largest older population in Surrey and a growing over 85 year old population. The borough has the second highest number of residents over 65 years of age

who have suffered a stroke. Dementia also poses a significant challenge, with Waverley having the highest number of residents predicted to have dementia in Surrey.

If monitoring has NOT been undertaken or information is not available, specify the arrangement you intend to make; if not please give a reason for your decision.

Lack of readily reportable data on protected characteristics of households in housing need on the Housing Register. Future Service Improvement project to improve inputting and reporting of this data in Orchard.

What research or consultation has been undertaken to understand the impacts of the strategy/policy/procedure/project/function?

The updates to the SPD are all either as a result of national policy changes, which have been EqIA'd by the Government, or in line with our Affordable Homes Delivery Strategy. Consultation on the Affordable Homes Delivery Strategy was carried out via Waverley Homes and People, social media and in person with Landlord Services Advisory Board and Tenant Panel representatives between 27.01.22-24.02.22. Residents, Town and Parish Councils, partner organisations, developers and affordable housing providers were consulted.

Monitoring data of respondents (those responding as individuals, rather than organisations) suggests that the response rate was very low for those aged 85+ despite our elderly population. Several responses were received from organisations working to meet the needs of older people and people needing supported accommodation. Over 95% of respondents were white, which reflects the local population but not the makeup of WBC tenants. The Tenants' Panel, representing all tenants, was also consulted.

Consultation on the Affordable Housing SPD will take place from 17.10.22 – 28.11.22. This Equality Impact Assessment will be updated following the consultation.

Section 3 – assess the impact on protected characteristic groups

Using examples from the evidence you have collected and using the list below for reference, how might different equality groups be affected by

this policy, procedure or practice? Where possible please describe the impact as either 'positive', 'negative' or 'neutral'.

- Sex
- Gender reassignment
- Race
- Disability
- Sexual orientation
- Age
- Religion or belief
- Pregnancy and maternity
- Marriage and civil partnership
- Other groups such as carers, care leavers or socio-economic disadvantage

Possible positive impact on women, transgendered men and women, people from ethnic minority groups, people with disabilities, LGBTQ+ people, young pregnant women and families with young children, carers,

Data shows that women are more likely to access social housing. Developing new affordable housing therefore benefits this group.

Trans people face challenges such as homelessness and lack of work opportunities. More affordable housing may therefore benefit Trans people.

Our data shows that when compared to the population of the borough as a whole, ethnic minority groups are more likely to access social housing. Developing new affordable housing and reducing rent levels therefore benefits this group.

The need for pitches for Gypsy, Roma & Traveller groups is being met through Local Plan Part 2. However, this Affordable Housing SPD and reduction in rent levels may benefit those Gypsy, Roma & Traveller households seeking settled accommodation in the form of social housing.

When assessing planning applications Waverley BC will work with Adult Social Care Commissioners to meet the specific housing needs of those with physical, sensory or learning disabilities, long term health impairments or mental health issues.

LGBTQ+ people face challenges such as homelessness and lack of work opportunities. More affordable housing at reduced rent levels may therefore benefit LGBTQ+ people.

Young pregnant women and families with children on low incomes will benefit from reduced rent levels.

Older people needing affordable housing / sheltered accommodation will benefit from lower rent levels and social rents.

A broader offer of affordable housing suitable for those needing a carer may positively impact carers.

Reduction in Affordable Rent levels actively promotes equality, reduces economic and social disparities and helps to ensure an adequate standard of living for all, regardless of income or background.

Possible negative impact on single people.

Low impact on single people – affordability pressures are more severe for single person households. The proposal to reduce affordable rents to 70% for 1 and 2 bed homes, but 65% for 3 and 4 bed homes, may disproportionately impact single people. However, the priority to enable more social rented homes will help to mitigate this. Single person households receiving full housing benefit would be unaffected by the new cap. Overall, the policy to cap rents below 80% still benefits single person households, albeit to a lesser extent than the larger families in 3 / 4 beds.

No potential negative impacts are intentional or of high impact.

Section 4 – Consider alternatives or changes

List any changes – explain how policy/activity has changed or needs to change and the reason for this.

n/a

Section 5 – Action planning

List actions required, officer action is assigned to, resource implication, comments and time scale.

n/a

Section 6 – Sign off

Name of assessor: Esther Lyons

Date: 04.08.22

Signed off by: Louise Norie

Date: 05.10.22

Name of HOS or Director: Andrew Smith

Further guidance

If you need more advice and guidance, you may find the following sources useful:

- [Government Equality Office: Equality Act guidance](#)
- [Equality and Human Rights Commission: Public Sector Duty](#)
- [Equality and Human Rights Commission: *Protected Characteristics*](#)

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WAVERLEY BOROUGH COUNCIL

EXECUTIVE - 7 MARCH 2023

COUNCIL – 21 MARCH 2023

Title:

**DRAFT UPDATED AIR QUALITY ACTION PLAN
DRAFT CLEAN AIR STRATEGY FOR WAVERLEY**

Portfolio Holder: Cllr. Steve Williams Portfolio Holder for Environment and Sustainability

Head of Service: Richard Homewood, Executive Head of Regulatory Services

Key decision: No

Access: Public

1.0 Purpose and summary

- 1.1 To review feedback from the public consultation and consider the draft updated Air Quality Action Plan (AQAP) February 2023 for the Air Quality Management Areas (AQMAs) and draft Clean Air Strategy for Waverley (CAS) February 2023.
- 1.2 To seek approval of the draft updated Air Quality Action Plan (AQAP) February 2023 and draft Clean Air Strategy for Waverley (CAS) February 2023, prior to submitting the AQAP to Defra for approval.

2.0 Recommendation

- 2.1 It is recommended that the Executive note the feedback from the public consultation and recommend that Council adopt the draft updated AQAP February 2023 and draft CAS February 2023, which align with the Climate Change and Sustainability Strategy (CCSS), the Carbon Neutrality Action Plan (CNAP) and the work underway on the Farnham Infrastructure Plan (FIP).

3.0 Reasons for the recommendations

- 3.1 To afford Members of the Executive the opportunity to comment on feedback from the public consultation and the draft updated Air Quality Action Plan (AQAP) February 2023 and draft Clean Air Strategy for Waverley (CAS) February 2023.
- 3.2 To approve the draft updated Air Quality Action Plan (AQAP) February 2023 and draft Clean Air Strategy for Waverley (CAS) February 2023, prior to submitting the AQAP to Defra for approval

4.0 Background

- 4.1 Members will recall that the outline process to update the AQAP and develop a CAS was presented to Executive Briefing on 13 September at the time the 2022 Air Quality Annual Status Report was presented.
- 4.2 Whilst it is currently not a statutory requirement to produce a CAS the Executive considered the adoption of a strategy to encourage actions to improve air quality across the Borough important, given impacts poor air quality can have on health. This is consistent with the Council's strategic objective for improving the health and wellbeing of our residents and communities, taking action in response to the Climate Emergency and protecting the environment.
- 4.3 Consultants were appointed to work with the Council to update the AQAP for the Air Quality Management Areas and develop a CAS for Waverley that aligns with the CCSS, the CNAP and the FIP. A member and officer Air Quality Steering Group was formed to help take this project forward.
- 4.4 There were two steering group meetings prior to the public consultation, on the 13 September and 18 October. Feedback from the Executive on the updated draft AQAP and draft CAS was received from the Climate Emergency Board on 8 November 2022 and the Executive on 15 November 2022.
- 4.5 Members of the Services Overview and Scrutiny Committee were also given the opportunity to review the documents at a special meeting held on the 9 January 2023. Feedback from this meeting was also considered in preparing the final drafts.

5.0 Public Consultation

- 5.1 The public consultation strategy was developed with the Communications Team and the public consultation ran from 5 December 2022 to 15 January 2023. Many people and organisations were emailed directly such as schools, GPs, WBC Members, Town and Parish Councils and Members, Chamber of Commerce contacts, neighbouring local authorities, SCC's Public Health and Highways, National Highways and the Environment Agency. The public were notified of the consultation on the [Council's news](#) webpage and via numbers of social media posts.
- 5.3 People and organisations were encouraged to complete an online survey or to email Environmental Health directly. Please see the AQAP and CAS [consultation webpage](#)
- 5.4 Additionally all WBC Members and Town and Parish Councils and Members were invited to a Meeting on the 7 December 2022 to introduce the draft updated AQAP and CAS, address any queries, and discuss feedback. Overview and Scrutiny for Services also reviewed the documents and gave feedback at their meeting on 9 January 2023.
- 5.5 Following the public consultation the Air Quality Steering Group met on the 31 January 2023 to review feedback and their response to it. Officers also met with SCC Highways for their response.

5.6 A Review of Consultation Responses, February 2023 is given in Annexe A, Appendix A. It details the consultation responses we received, summarises and reviews them, and details where the draft updated Air Quality Action Plan (AQAP) and draft Clean Air Strategy have been updated, and some actions needed.

6.0 Draft Updated Air Quality Action Plan

6.1 The draft updated AQAP February 2023 is presented in Annexe A. It includes a Review of Consultation Responses February 2023 (Appendix A), and draft CAS February 2023 (Appendix C).

6.2 There are 2 AQMAs in Waverley. One in Farnham and one in Godalming, both declared as the annual mean air quality objective for NO₂ was being exceeded at relevant locations there.

6.3 The draft updated AQAP only relates to actions to improve NO₂ concentrations within the AQMAs. It is a statutory requirement and must follow Defra's prescribed report template.

6.4 Once Council has approved the AQAP it will be submitted to Defra for approval.

7.0 Draft Clean Air Strategy for Waverley

7.1 The draft CAS February 2023 is presented in Annexe A, Appendix C.

7.2 The CAS covers the whole Borough and actions to improve outdoor concentrations NO₂ and PM (particulate matter). Strategies are not required by Defra to have a set format.

8.0 Relationship to the Corporate Strategy and Service Plan

8.1 An AQAP and CAS will help support the Corporate Strategy's aims to 'improve the health and well-being of our residents and communities' and 'taking action to protect the environment.' There is a requirement in the Service Plan to follow Defra's Local Air Quality Management requirements and produce a CAS.

9.0 Implications of decision

9.1 Resource (Finance, procurement, staffing, IT)

9.1.1 The development of an AQAP and CAS forms an integral element of the overall Carbon Neutrality Action Plan which will be reviewed annually. An update on actions will also be detailed in the annual Air Quality Status Report which is published on the web. Actions detailed can have significant financial implications for the borough and county councils and for other agencies but cannot be quantified at this stage. Additionally, without additional staff resources we are unlikely to be able to action all commitments made.

9.2 Risk management

9.2.1 Achieving many of the actions detailed in the AQAP and CAS are dependent on actions by other organisations and the public, which we cannot control. Lack of financial and staff resources will limit our ability to meet commitments made.

9.3 Legal

9.3.1 The Local Air Quality Management regime (LAQM) is set out in Part IV of the Environment Act 1995 and relevant Policy and Technical Guidance documents. The LAQM process places an obligation on all local authorities (borough and district councils and unitary councils) to regularly review and assess air quality in their areas.

9.4 Equality, diversity and inclusion

9.4.1 Poor air quality can have an adverse effect on vulnerable groups in the community. Actions to improve air quality will support those groups and the community at large.

9.5 Climate emergency declaration

9.5.1 Waverley has in place climate change and sustainability strategies, which bring together work in relation to air quality, green spaces and waste. An updated AQAP and CAS forms an integral part of that strategy and contributes to the delivery of the carbon neutrality action plan.

10.0 Consultation and engagement

10.1 The public consultation undertaken, and the review of consultation responses are set out above in section 5 of this report.

10.2 There will be ongoing consultation and engagement with Members through the Climate Emergency Board and Farnham Infrastructure Board.

11.0 Other options considered.

11.1 The production of the updated Air Quality Action Plan and annual Air Quality Status reports are a statutory requirement.

12.0 Governance journey

Executive – 7 March 2023

Overview and Scrutiny for Services – 14 March 2023, verbal update to Council.

Council – 21 March, approve Executive minutes with adoption of AQAP and CAS

Attachments

Annexe A - Air Quality Action Plan (Draft), February 2023 incorporating:

Annexe A - Appendix A – Review of Consultation Responses, February 2023

Annexe A - Appendix B – Reasons for not pursuing action plan measures

Annexe A - Appendix C – Clean Air Strategy (Draft), February 2023

CONTACT OFFICER:

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Waverley Borough Council

Air Quality Action Plan (Draft)

In fulfilment of Part IV of the Environment Act 1995

Local Air Quality Management

February 2023

Waverley Borough Council

Information	Waverley Borough Council Details
Local Authority Officer	Jeanette Guy
Department	Regulatory Services
Address	Waverley Borough Council, The Burys, Godalming, Surrey, GU7 1HR
Telephone	01483 523005
E-mail	Jeanette.Guy@Waverley.gov.uk
Report Reference Number	Waverley AQAP 2023 (Issue 1)
Date	February 2023

Executive Summary

This Air Quality Action Plan (AQAP) has been produced as part of our statutory duties required by the Local Air Quality Management framework. It outlines the action we will take to improve air quality in Waverley between 2023 and 2028.

This action plan replaces the previous action plan which ran from 2008. Projects delivered through the past action plan include: the Hindhead Tunnel and bypass (which alleviated congestion on the A3 with Hindhead Air Quality Management Area (AQMA) being revoked), ongoing work in relation to Farnham town centre, review of the Urban Traffic Control (UTC) system in Godalming, and the Waverley Corporate Travel Plan. Wider measures such as highlighting air alert options on Waverley Borough Council's (WBC's) website, behavioural change campaigns and working with schools to reduce emissions associated with the school run have also been delivered. It is not feasible to determine the specific impacts of these individual schemes, although these, as well as measures implemented at county, national and international levels have resulted in trends in reductions in concentrations across Waverley.

Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. There is also often a strong correlation with equalities issues, because areas with poor air quality are also often the less affluent areas^{1,2}.

The annual health cost to society of the impacts of particulate matter alone in the UK is estimated to be around £16 billion³. Waverley Borough Council is committed to

¹ Environmental equity, air quality, socioeconomic status and respiratory health, 2010

² Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006

³ Defra. Abatement cost guidance for valuing changes in air quality, May 2013

reducing the exposure of people in Waverley to poor air quality in order to improve health.

Actions have been developed that can be considered proportionate to the air quality objective exceedances within the AQMAs. Therefore, measures are focussed on what can be delivered in the next few years. This AQAP is complemented by a Clean Air Strategy (CAS), which considers measures much more widely across Waverley, which will also help to reduce emissions within the AQMAs. The CAS is therefore included as an appendix. Where measures have been considered, but discounted, they are included in Appendix B under the broad topics outlined in Defra's reporting templates.

Our priorities are

- to work collaboratively with SCC to ensure that the Farnham Infrastructure Programme is agreed and delivered, and displacement of traffic does not become a risk to the achievement of air quality objectives elsewhere in Farnham. This will be undertaken through modelling the air quality impacts of the preferred options to assist in decision making;
- to adopt and implement the Waverley Clean Air Strategy, which this Action Plan supports (incorporating measures to reduce emissions across Waverley), which will assist in improving air quality and therefore maintaining concentrations below air quality objectives in Godalming and Farnham; and
- Report on an annual basis the implementation of both the Farnham Infrastructure Programme and the Waverley Clean Air Strategy, as well as monitored concentrations within the AQMA.

In this AQAP we outline how we plan to effectively tackle air quality issues within our control. However, we recognise that there are a large number of air quality policy areas that are outside of our influence (such as vehicle emissions standards agreed in Europe), but for which we may have useful evidence, and so we will continue to work with regional and central government on policies and issues beyond Waverley Borough Council's direct influence.

Responsibilities and Commitment

Waverley Borough Council

This AQAP was prepared by the Environmental Protection team of Waverley Borough Council with the support and agreement of the following officers and departments:

Transport Studies, Surrey County Council
Environmental Health Manager (Environmental Protection) (WBC)
Environmental Health Officer (Air Quality) (WBC)
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Portfolio Holder for Planning and Economic Development
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Development Lead Strategic Sites (WBC)
Surrey County Councillor for Farnham North (Surrey County Council)
Senior Planning Policy Officer (WBC)
Economic Development Manager (WBC)
Councillor - Farnham Town Council
Executive Head of Regulatory Services (WBC)
Public Health (Surrey County Council)
Sustainability Manager (WBC)
Surrey County Council Green Futures

This AQAP has been approved by the Executive Head of Regulatory Services. On behalf of the Surrey County Council Director of Public Health, the Public Health team work closely with Surrey Air Alliance including District and Borough Council partners responsible for submitting Annual Statement Reports (ASR) on air quality within their area; to develop initiatives, air quality action plans, and implement actions to improve air quality across the county of Surrey. Public Health is also contributing to the development of a Clean Air Strategy for Waverley.

The AQAP will be reviewed by the Climate Change Emergency Board and Overview and Scrutiny for Services prior to going out to consultation.

Waverley Borough Council

This AQAP will be subject to an annual review, appraisal of progress, with progress each year reported in the Annual Status Reports (ASRs) produced by Waverley Borough Council, as part of our statutory Local Air Quality Management duties.

If you have any comments on this AQAP please send them to Environmental Health at: Waverley Borough Council, Council Offices, The Burys, Godalming, Surrey, GU7 1HR

Telephone: 01483 523393

Email: Environmentalhealth@waverley.gov.uk

Table of Contents

Executive Summary	i
Responsibilities and Commitment	ii
1 Introduction	1
2 Summary of Current Air Quality in Waverley	2
3 Waverley’s Air Quality Priorities	5
3.1 Public Health Context.....	5
3.2 Planning and Policy Context.....	6
Waverley Corporate Strategy 2020-2025	6
Local Plan	7
Local Transport Plan	8
Farnham Infrastructure Programme	9
Waverley Carbon Neutrality Action Plan 2020-2030	10
Air Quality Action Plan (July 2008).....	11
3.3 Source Apportionment.....	11
3.4 Required Reduction in Emissions.....	13
3.5 Key Priorities	15
4 Development and Implementation of Waverley Borough Council’s AQAP	16
4.1 Consultation and Stakeholder Engagement.....	16
4.2 Steering Group.....	17
5 AQAP Measures	18
Quantification of measures	26
Cost Effectiveness of AQAP Actions	26
Appendix A: Response to Consultation	28
Appendix B: Reasons for Not Pursuing Action Plan Measures	46
Appendix C: Clean Air Strategy	47

Glossary of Terms 72

List of Tables

Table 1: Percentage Decrease in Road NO_x required to Meet Annual Mean NO₂ Objective at Relevant Modelled Receptors (µg/m³) in 2019 15

Table 4.1 – Consultation Undertaken 16

Table 5.1 – Air Quality Action Plan Measures - Farnham.....20

Table 5.2 – Air Quality Action Plan Measures - Godalming23

List of Figures

Figure 1 Godalming AQMA showing 2019 monitored concentrations2

Figure 2 Farnham AQMA showing 2019 monitored concentrations3

Figure 3: Source Apportionment (µg/m³ NO₂) in 2017 for locations in Farnham (CERC, 2019) 12

Figure 4: Source Apportionment (µg/m³ NO₂) in 2017 for locations in Godalming (CERC, 2019) 13

1 Introduction

This report outlines the actions that Waverley Borough Council will deliver between 2023 and 2028 in order to reduce concentrations of air pollutants and exposure to air pollution; thereby positively impacting on the health and quality of life of residents and visitors to Waverley Borough Council's administrative area.

It has been developed in recognition of the legal requirement on the local authority for the AQAP to *have the purpose of securing that air quality objectives are achieved*. The air quality objectives are set under Part IV of the Environment Act 1995⁴, Part 4 of the Environment Act 2021⁵, and relevant regulations made to meet the requirements of the Local Air Quality Management (LAQM) statutory process.

This Plan will be reviewed every five years at the latest and progress on measures set out within this Plan will be reported on annually within Waverley Borough Council's air quality Annual Status Report (ASR).

⁴ Available at <https://www.legislation.gov.uk/ukpga/1995/25>

⁵ Available at <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>

2 Summary of Current Air Quality in Waverley

Air quality in Waverley is generally good when compared to national air quality objectives. There are currently two AQMAs declared for the nitrogen dioxide annual mean air quality objective in Godalming and Farnham. This AQAP includes actions for both of the AQMAs. Figures 1 and 2 illustrate monitoring data for 2019 within, and just outside, each of the AQMAs. These monitoring sites are part of a wider monitoring strategy across the borough, for both nitrogen dioxide and PM₁₀.

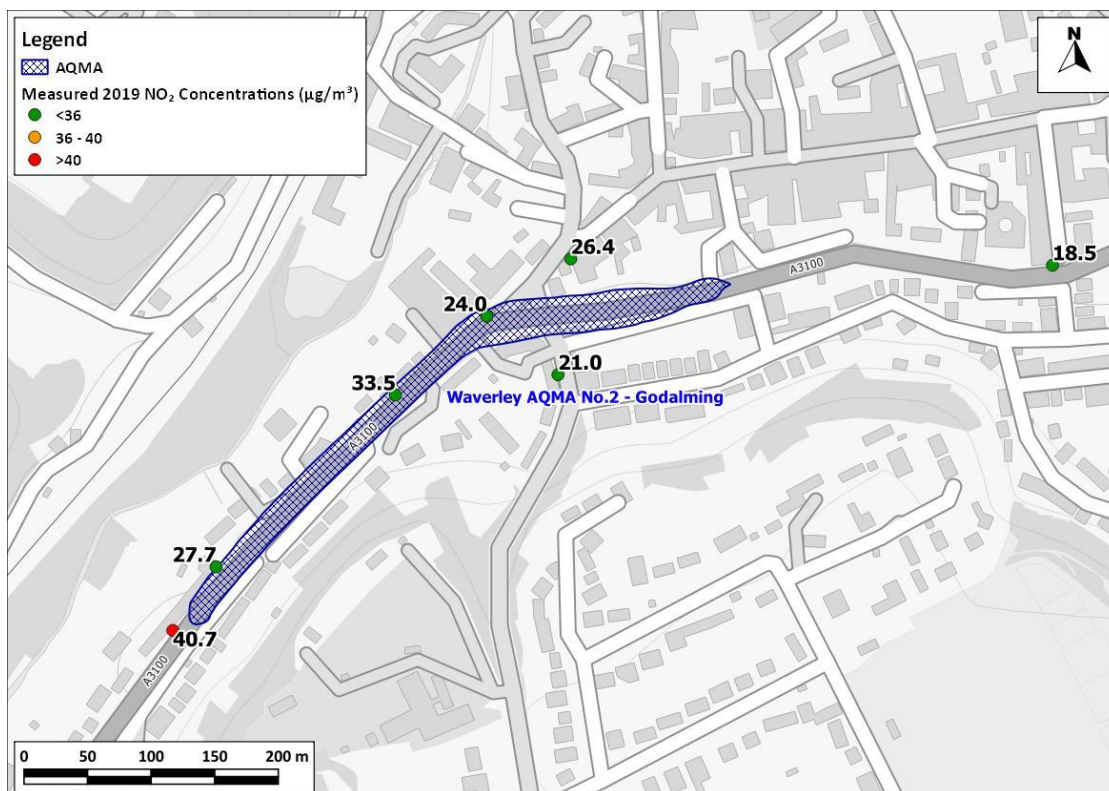


Figure 1 Godalming AQMA showing 2019 monitored concentrations

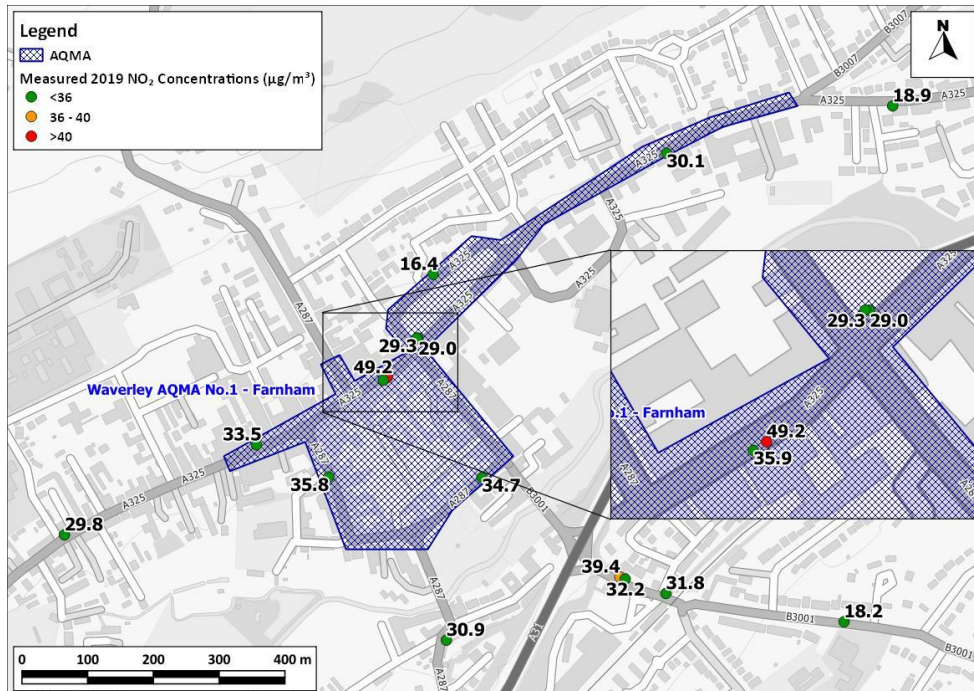


Figure 2 Farnham AQMA showing 2019 monitored concentrations

In Godalming, there was a marginal exceedance just outside the AQMA on Ockford Road in 2019. This is representative of one property with a porch which is closer to the carriageway than other residential properties, the road at this location is on a gradient, with reduced dispersion due to the effect of houses and hedges creating a ‘canyon’. Since 2019, concentrations at this site have been well below the objective (32.9 $\mu\text{g}/\text{m}^3$ in 2020 and 33.7 $\mu\text{g}/\text{m}^3$ in 2021).

In Farnham, the exceedance is restricted to diffusion tube site WBC9 which is located on The Borough, which measured 49.2 $\mu\text{g}/\text{m}^3$ in 2019. However, WBC9 is at ground floor level, with relevant exposure in flats above the shops, and a tube (WBC51) is situated higher up the building to represent relevant exposure, which has been below the objective in both 2019 and 2021 (no annual mean reported in 2020). Since 2019 WBC9 has also been below the objective (33.6 $\mu\text{g}/\text{m}^3$ in 2020 and 34.1 $\mu\text{g}/\text{m}^3$ in 2021).

Although the exceedances are marginal in 2019, actions to improve air quality at these locations are set out in this Plan, which is in line with WBCs statutory requirements within the LAQM process. It should be noted that Upper Hale Road in Farnham is currently (2021) measuring concentrations marginally higher than the Borough (35.1 $\mu\text{g}/\text{m}^3$ at WBC4), and this location is representative of facades of

properties nearby, however this is below relevant air quality objectives. The AQAP has, however, been developed, with the aim that concentrations will not worsen at this location as a result of any actions within this plan.

All measurements are subject to uncertainty, and data from diffusion tubes are adjusted in relation to the laboratory and preparation method (a process termed bias adjustment) in order to reduce the uncertainty of annual means. However, Defra in recognition of this inherent uncertainty, recommend that the revocation of an AQMA should only be considered following three consecutive years of annual mean nitrogen dioxide concentrations being lower than $36 \mu\text{g}/\text{m}^3$ (i.e., within 10% of the annual mean objective). In addition, pollutant concentrations may vary significantly from one year to the next, due to the influence of meteorological conditions, and Waverley Borough Council should be reasonably certain that any future exceedances (that might occur in more adverse meteorological conditions) are unlikely, before revoking an AQMA. This AQAP takes into account these inherent uncertainties, while also taking a proportionate approach.

Alongside this AQAP, a Clean Air Strategy (CAS) has also been developed which includes more strategic actions, which will not only positively impact on the AQMAs, but also across the borough, including Upper Hale Road.

Waverley Borough Council's Annual Status Reports can be found at <https://www.waverley.gov.uk/Services/Environmental-concerns/Pollution-control/Air-quality/Air-quality-reports>.

3 Waverley's Air Quality Priorities

3.1 Public Health Context

Air pollution is a major public health risk ranking alongside cancer, heart disease and obesity. A review by the World Health Organisation concluded that long-term exposure to air pollution reduces life expectancy by increasing the incidence of lung, heart and circulatory conditions. The Department of Health and Social Care's advisory Committee on the Medical Effects of Air Pollutants (COMEAP) has estimated that long-term exposure to man-made air pollution in the UK has an annual impact on shortening lifespans, equivalent to 28,000 to 36,000 deaths⁶ (COMEAP, 2018). Poor air quality can affect health at all stages of life. Those most affected are the young and old. In the womb, maternal exposure to air pollution can result in low birth weight, premature birth, stillbirth or organ damage. In children, there is evidence of reduced lung capacity, while impacts in adulthood can include diabetes, heart disease and stroke. In old age, a lifetime of exposure to air pollution can result in reduced life-expectancy and reduced wellbeing at end of life. There is also emerging evidence for a link between air pollution and an acceleration of the decline in cognitive function (Defra, 2019)⁷.

Poor air quality disproportionately affects the poorest and most vulnerable in our communities including children. Public health not only aims to improve health, but also reduce health inequalities by using an evidence-based approach to make recommendations on the delivery of health and wellbeing services. As such, this AQAP will support work underway within the public health arena.

⁶ <https://www.gov.uk/government/publications/nitrogen-dioxide-effects-on-mortality/associations-of-long-term-average-concentrations-of-nitrogen-dioxide-with-mortality-2018-comeap-summary>

⁷ <https://www.gov.uk/government/publications/clean-air-strategy-2019>

This AQAP will complement work underway at County level. Public Health staff have drafted the Joint Strategic Needs Assessment (JSNA)⁸ which is an assessment of the current and future health and social care needs of the local community. The JSNA informs the Health and Wellbeing Strategy (HWS)⁹ which is a strategy for meeting the needs identified in the JSNA. These are needs that could be met by the local authority, Integrated Care Boards or NHS England. Within the JSNA there is a section on air quality.

The Public Health Outcome Framework (PHOF) for England recognises the burden of ill health resulting from poor air quality. PHOF Indicator D01 reports that 5.7% of deaths in Waverley during 2020 were attributable to particulate air pollution (PM_{2.5}) (undertaken using the 'new method'), which is slightly lower than for Surrey (6.2%) but slightly higher than the England average, 5.6%¹⁰.

3.2 Planning and Policy Context

Waverley Corporate Strategy 2020-2025

The Waverley Corporate Strategy¹¹ sets out the vision *'that Waverley will be environmentally, economically and financially sustainable with healthy, inclusive communities and housing available for all who need it'*. The Strategy sets out the strategic priorities of the Council which include:

- Supporting a strong, resilient local economy;
- Taking action on Climate Emergency and protecting the environment;

⁸ <https://www.surreyi.gov.uk/jsna/>

⁹ <https://www.healthysurrey.org.uk/about/strategy>

¹⁰ Data available at <https://fingertips.phe.org.uk/profile/public-health-outcomes-framework/data#page/1/gid/1000043/pat/6/par/E12000008/ati/101/are/E07000216/yrr/1/cid/4/tbm/1>

¹¹ <https://www.waverley.gov.uk/Services/Council-information/About-Waverley-Borough-Council/Corporate-Strategy-2020-25>

- Effective strategic planning and development management to meet the needs of our communities; and
- Improving the health and wellbeing of our residents and communities.

As well as the commitment to be carbon neutral by 2030, WBC has included a number of high level commitments to deliver the strategic priorities above, such as

- promoting a pedestrian-friendly and cycle friendly transport network; and
- taking action on air quality issues, especially those caused by vehicle emissions, and encouraging zero-carbon buses and taxis.

This AQAP therefore directly complements the overall vision of the Council, and will assist in delivering the above priorities.

Local Plan

The Local Plan Part 1: Strategic Policies and Sites (LPP1)¹², adopted in 2018, sets out the Council's spatial framework for delivering the development and change needed to realise the vision for development in Waverley up to 2032. Local Plan Part 2 (LPP2) will form the second stage of Waverley's new Local Plan. Together with LPP1 this document will replace the 2002 Local Plan. LPP2 will provide the more detailed 'Development Management' policies, review a suite of local designations and will allocate sites needed for housing or other uses in certain areas of Waverley.

LPP1 has a number of references to air quality. In Policy ST1 Sustainable Transport:

“The Council will work in partnership with Surrey County Council, neighbouring authorities, transport providers and other key stakeholders to ensure that development schemes:

.... 7. are consistent with the objectives and actions within the Air Quality Action Plan”

¹² <https://www.waverley.gov.uk/Services/Planning-and-building/Planning-strategies-and-policies/Local-plan/Local-Plan-Part-1>

LPP2 (Pre-Submission Document) currently includes Policy DM1 as follows:

DM1: Environmental Implications of Development

“Development should:

a) Avoid harm to the health or amenity of occupants of nearby land and buildings, and future occupants of the development, including by way of an unacceptable increase in pollution, light, noise, dust, vibration, and odour, or an increase in flood risk;

b) Not cause a deterioration to the environment by virtue of potential pollution of air, soil or water, including that arising from the storage and use of hazardous substances, while seeking opportunities to improve air and water quality where possible;”

One of the objectives of LPP1 is *“to support the delivery of at least 11,210 additional homes in Waverley in the period 2013 to 2032 (an average of 590 homes a year). To contribute to the delivery of sustainable communities by directing most new development to the main settlements of Farnham, Godalming, Haslemere and Cranleigh, where there is the best available access to jobs, services and other facilities”*. This includes a new settlement of 2,600 homes at the Dunsfold Aerodrome site. Particularly where large-scale development is planned, air quality must be fully considered from an early stage in the process, and air quality is referenced within the Dunsfold Park Garden Village Supplementary Planning Document. This AQAP will ensure that the principles set out in LPP1 and LPP2 will contribute to improving air quality within the AQMAs, and more widely.

Local Transport Plan

Surrey County Council is updating its Local Transport Plan¹³, which sets out the changes required to achieve net zero emissions by 2050. SCC are committed to

¹³ <https://www.surreycc.gov.uk/roads-and-transport/policies-plans-consultations/transport-plan/strategies/air-quality-strategy>

significantly transforming transport networks to meet this national target and LTP4 sets out the following key policies:

- Active travel and personal mobility;
- Public and shared transport;
- Promoting zero emission vehicles; and
- Planning for Place.

In the short-term (to 2025), LTP measures will be focused on achieving a 'green' and 'healthy' recovery of transport choices after Covid-19, and taking action and strengthening transport links to deliver the planning, development, design, public space management and digital connectivity aspects of the LTP4. This also includes building on the increased interest in walking and cycling to start a 'shift' away from car dependency, rebuilding trust in public transport, accelerating EV uptake, continuing to build on existing good practice, and delivery of relevant schemes. All of these shifts will reduce local air quality emissions and therefore assist with the delivery of this AQAP.

Farnham Infrastructure Programme

Surrey County Council, Waverley Borough Council, Farnham Town Council and the local MP are working together to transform Farnham and its surrounding areas by addressing issues such as congestion and air quality, through the Farnham Infrastructure Programme (FIP). Objectives of the programme include:

- To rapidly reduce carbon emissions, ensuring that Farnham and Waverley are on track for net zero by 2050 (note WBC has committed to becoming a carbon neutral council by 2030);
- Provide well-connected communities across Farnham;
- Support the economic vitality of Farnham and enable sustainable growth; and
- Improve the quality of place in Farnham with clean air, healthy lifestyles, and less dominance of traffic on communities.

The Farnham Optimised Infrastructure Plan¹⁴ sets out the policy context, challenges and opportunities, objectives, potential options and emerging strategy and next steps to be undertaken to deliver improvements in Farnham.

The proposals which have recently been consulted on are:

- Castle Street and Downing Street improvements;
- Changing the traffic flow direction, and widening pavements on The Borough, Castle Street and Downing Street; and
- Options to reduce congestion on the A31 and to improve crossings for pedestrians and cyclists, and for public transport.

Currently, a 'hybrid' option (combining bullet points 1 and 2 above) is being modelled using a traffic model, which will then provide input data for an air quality dispersion model. The FIP is supported by other projects being implemented by SCC including a short and medium term improvements or 'quick wins' project¹⁵ looking at what can be implemented quickly in the town, and the Farnham Local Cycling and Walking Infrastructure Plan (LCWIP). The options being implemented within the 'quick wins' project are the re-routing of HGVs, implementation of 20 mph zones, removing A road status for roads that cross the town centre and addressing concerns related to narrow pavements and pedestrian safety. Further clarity on the preferred option to be implemented will be forthcoming in due course.

Waverley Carbon Neutrality Action Plan 2020-2030

In 2019 WBC declared a climate emergency and committed to becoming a carbon neutral council by April 2030. The plan provides a statement of the council's areas of focus to achieve a carbon neutral borough, which will evolve as projects and actions

¹⁴ Available at <https://www.surreycc.gov.uk/roads-and-transport/policies-plans-consultations/major-transport-projects/farnham-infrastructure-programme/farnham-infrastructure-programme-key-documents>

¹⁵ Short and medium-term improvements or 'quick wins' project - Surrey County Council ([surreycc.gov.uk](https://www.surreycc.gov.uk))

are developed further¹⁶. Seven key priority areas have been identified each containing a number of high-level targets that will focus efforts to achieve the ambitious carbon neutral target. Embedding a carbon neutral culture within processes and policies is significant to sustaining long term change. Key priority areas include a focus on active travel and air quality, focus on energy generation, a focus on the built environment, on land use and adaptation, and on supporting a green economy, all of which complement the aims of this AQAP.

Air Quality Action Plan (July 2008)

The previous action plan adopted in 2008¹⁷ contained specific actions for the (then) three AQMAs. In relation to Farnham, the town centre package, as outlined in the Farnham Review Study, was supported. This featured a number of different strands including measures to increase active travel, changes in delivery patterns, traffic management, and a reallocation of road space for pedestrians. However, in response to local concerns, particularly in relation to a displacement of traffic causing issues elsewhere, further feasibility work was recommended. In relation to Godalming, work to update the existing urban traffic control (UTC) system was highlighted, in order to reduce congestion and improve air quality. Other wider measures were also included in the previous Air Quality Action Plan, such as the Waverley Corporate Travel Plan, behaviour change campaigns and school travel plans.

3.3 Source Apportionment

The AQAP measures presented in this report are intended to be targeted towards the predominant sources of emissions within the AQMAs.

¹⁶ <https://www.waverley.gov.uk/Services/Environmental-concerns/Sustainability-and-conservation/Climate-change-strategy-and-action-plan>

¹⁷ <https://www.waverley.gov.uk/Services/Environmental-concerns/Pollution-control/Air-quality/Air-quality-reports>

A source apportionment exercise was carried out by CERC as part of a wider modelling study across Surrey¹⁸ in 2019 using a base year of 2017. This identified that within the AQMAs, the source contributions were as follows:

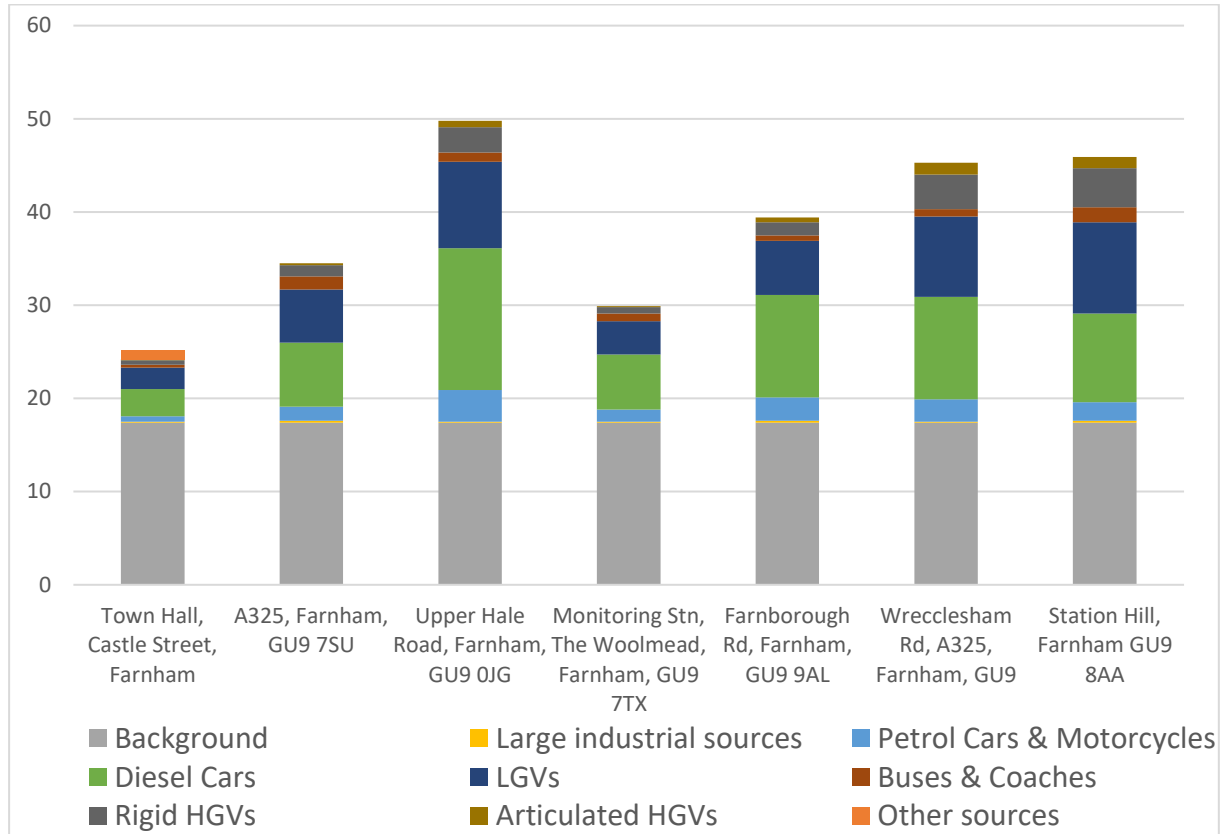


Figure 3: Source Apportionment (µg/m³ NO₂) in 2017 for locations in Farnham (CERC, 2019)

¹⁸ Detailed Air Quality Modelling and Source Apportionment (August 2019) Available at: https://www.guildford.gov.uk/media/32331/Detailed-air-quality-report/pdf/FM1183_Surrey_CERC_Guildford_19Nov19.pdf?m=637296299125670000. Further Interpretation of air quality modelling in Waverley, carried out for Surrey local authorities (March 2020) Available at: https://www.waverley.gov.uk/Portals/0/Documents/services/environmental-concerns/pollution-control/air%20quality/Further_interpretation_of_air_quality_modelled_in_Waverley_from_CERC___March_2020.pdf?ver=FuKDzFNczauvtmwyM2DAw%3D%3D

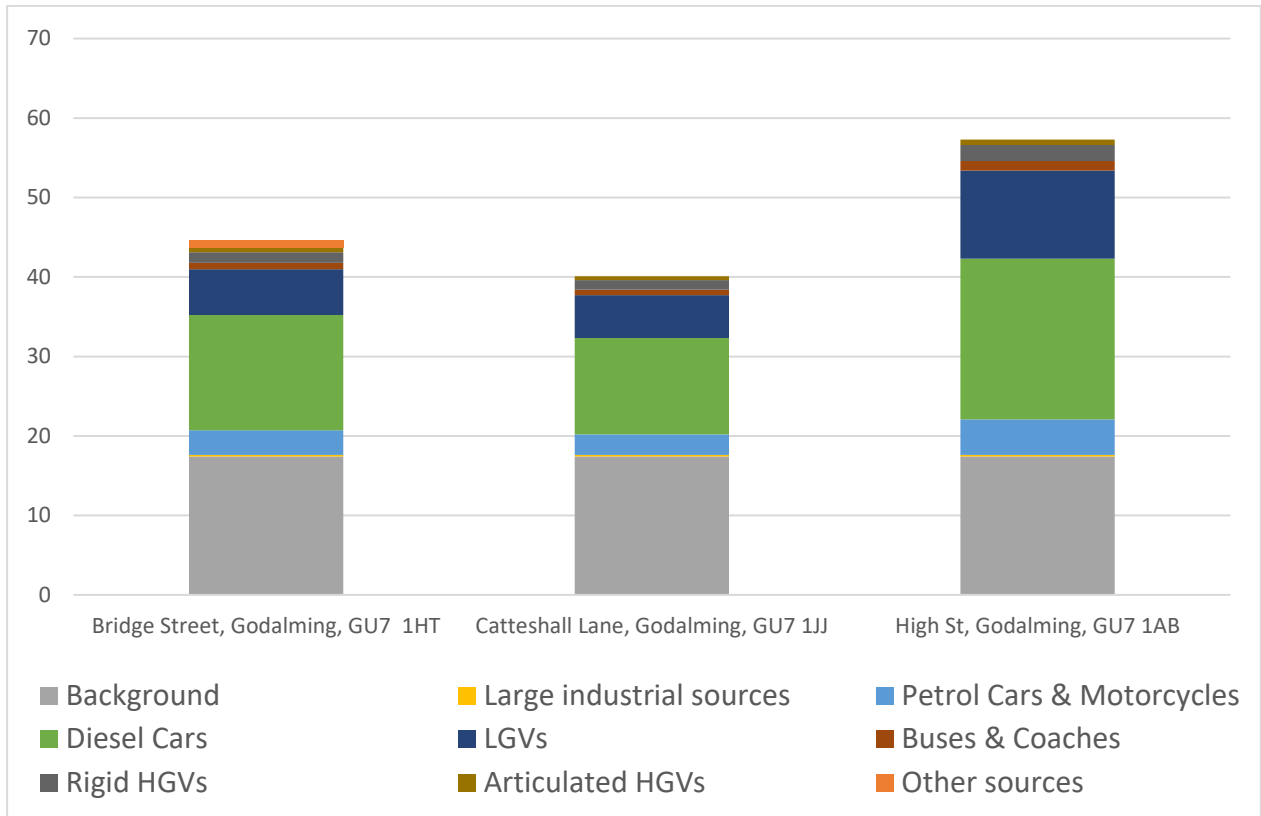


Figure 4: Source Apportionment (µg/m³ NO₂) in 2017 for locations in Godalming (CERC, 2019)

Although Figure 3 and Figure 4 are based on modelling undertaken for 2017 across Surrey (and hence not locally verified), the source contribution provides a useful indication of the contributions from different vehicle types within each of the AQMAs, which can be used to ensure that measures are appropriately targeted. In Farnham, after background concentrations have been accounted for, diesel cars, LGVs and rigid HGVs contribute the most to overall concentrations. In Godalming, there is a similar picture in that diesel vehicles predominate with respect to NO_x emissions.

3.4 Required Reduction in Emissions

The improvement in road NO_x emissions in order to meet the objective at monitored locations where concentrations exceeded the objective in 2019, is shown in

Table 1, categorised by AQMAs. As set out in LAQM Technical Guidance TG22¹⁹ paragraphs 7.115 to 7.117, any required percentage reductions of local emissions should be expressed in terms of NO_x due to local road traffic. This is because the primary emission is NO_x and there is a non-linear relationship between NO_x concentrations and NO₂ concentrations. The following calculations use the 2019 monitored NO₂ concentrations presented in the Annual Status Report 2022, and the methodology set out in TG22 Box 7.6. The 'Road NO_x - current' concentration has been calculated by using the NO_x to NO₂ calculator. The road NO_x concentration required to give a total NO₂ concentration of 40 µg/m³ (road NO_x-required) has been calculated using the NO_x to NO₂ calculator by entering a total NO₂ concentration of 40µg/m³, along with the background NO₂ concentration. Mapped backgrounds²⁰ have been used. The ratio of 'road NO_x-required' to 'road NO_x-current' gives the required percentage reduction in local road NO_x emissions to achieve the objective. WBC51 was 32.2 µg/m³ in 2019 and therefore no improvements are required to achieve the air quality objective. WBC9, which was above the objective is not a relevant location for the air quality objective. In Godalming, approximately 3% reduction in road NO_x emissions is required to achieve the objective, based on 2019 emissions (WBC31). It should be noted that since 2019 emissions have reduced at these locations, evidenced by lower concentrations which are below the air quality objectives. This is likely to be due to both fleet improvements, and, especially in 2020 the impact of travel restrictions put in place with regards to the Covid pandemic.

¹⁹ Available at <https://laqm.defra.gov.uk/wp-content/uploads/2022/08/LAQM-TG22-August-22-v1.0.pdf>

²⁰ <https://laqm.defra.gov.uk/air-quality/air-quality-assessment/background-maps/>

Table 1: Percentage Decrease in Road NO_x required to Meet Annual Mean NO₂ Objective at Relevant Modelled Receptors (µg/m³) in 2019

Diffusion Tube	Annual Mean Contribution (µg/m ³)					% Decrease in Road NO _x to Meet Objective
	Monitored NO ₂ Concentration	Road NO _x - Current (a)	Road NO _x – Required (b)	Background NO ₂ (for information)	Difference between a and b	
AQMA 1 Farnham						
WBC51	32.2 µg/m ³	36.28 µg/m ³	53.49 µg/m ³	13.73 µg/m ³	Lower than objective	no reduction required
AQMA 2 Godalming						
WBC31	40.7 µg/m ³	60.49 µg/m ³	58.87 µg/m ³	11.12 µg/m ³	1.62 µg/m ³	2.68%

3.5 Key Priorities

Based on the source apportionment, and the fact that the objectives have been achieved at all sites in 2020 and 2021, the following priorities are proportionate, and will ensure that transport related emissions are reduced. In order to reduce NO₂ concentrations, reductions need to focus on diesel vehicles, at the relevant locations, particularly cars, LGVs and to a lesser extent HGVs.

- Priority 1 – to work collaboratively with SCC to ensure that the Farnham Infrastructure Programme is agreed and delivered, and displacement of traffic does not become a risk to the achievement of air quality objectives elsewhere in Farnham. This will be undertaken through modelling the air quality impacts of the preferred options to assist in decision making;
- Priority 2 – adopt and implement the Waverley Clean Air Strategy, which this Action Plan supports (incorporating measures to reduce emissions across Waverley); and
- Report on an annual basis the implementation of both the Farnham Infrastructure Programme and the Waverley Clean Air Strategy, as well as monitored concentrations within the AQMA.

4 Development and Implementation of Waverley Borough Council's AQAP

4.1 Consultation and Stakeholder Engagement

In developing/updating this AQAP, we have worked with other local authorities, agencies, businesses and the local community to improve local air quality. Schedule 11 of the Environment Act 1995 requires local authorities to consult the bodies listed in Table 4.1. This consultation version of the AQAP, alongside the Clean Air Strategy, will be widely consulted on, both online and through events with the Town and Parish Councils. A version of the document will be made available online, with an online questionnaire for direct feedback. The consultation will be advertised through local media, including social media.

The response to our consultation stakeholder engagement is given in Appendix A: Response to Consultation.

Table 4.1 – Consultation Undertaken

Consultee	Consultation Undertaken
The Secretary of State	Yes
The Environment Agency	Not applicable for these locations
The highways authority	Yes
All neighbouring local authorities	Yes
Other public authorities as appropriate, such as Public Health officials	Yes
Bodies representing local business interests and other organisations as appropriate	Yes

4.2 Steering Group

A Steering Group was set up in order to take this Action Plan revision forward. Up to the publication of this draft, three Steering Group meetings have been held (13th September, 18th October 2022 and 31st January 2023). The meetings have involved; setting out the background to the air quality issue in Waverley, the process of the Action Plan and Clean Air Strategy, previous work undertaken on air quality (for example Surrey wide air quality modelling undertaken) and gaining input and insight into existing and future policy measures within Waverley and how these may assist in the implementation of the aims of this Plan (and vice versa). Some discussions around evaluation of the measures included were also held. The third meeting discussed the outcomes of the consultation process and specific changes required. Surrey County Council, as Highways Authority are key to the implementation of the transport measures within the plan, and their input is paramount to the success of this plan. The Steering Group has also had political representation and input from both Waverley Borough Council and Surrey County Council. Also included were public health colleagues from SCC, planning and climate change officers. The Steering Group will continue to be fully involved, and consulted on as the process continues.

5 AQAP Measures

Table 5.1 shows the Waverley Borough Council AQAP measures. It contains:

- a list of the actions that form part of the plan
- the responsible individual and departments/organisations who will deliver this action
- estimated cost of implementing each action (overall cost and cost to the local authority)
- expected benefit in terms of pollutant emission and/or concentration reduction
- the timescale for implementation
- how progress will be monitored

NB: Please see future ASRs for regular annual updates on implementation of these measures

These measures specific to each of the AQMAs reflects the current status of the statutory air quality objectives in each of the areas. As exceedances of the objectives were marginal in 2019 and there were no exceedances in 2020 or 2021, measures are proportionate, and also reflect resource limitations within the Council. Importantly, this plan is written alongside a Clean Air Strategy, which takes a more strategic view of air quality improvements across the Borough, and reflects that health effects arise from both PM_{2.5} as well as NO_x emissions, acknowledging that health effects are apparent even below current air quality objectives. WBC are fully committed to reducing emissions across the borough, both through this AQAP and through the implementation of the Clean Air Strategy, as well as working collaboratively in related policy areas such as the Local Plan, all of which will assist in reducing concentrations within the AQMAs. Of particular note are the ambitious targets within LTP4 to increase active travel, encourage a switch to Zero Emission Vehicles and implement policies on placemaking. WBC's commitment to work towards becoming net zero will reduce Greenhouse Gas emissions not only in relation to transport, but also more widely for example in energy generation, which will assist in the reduction of local air pollutant emissions, both directly and in reducing background concentrations.

In relation to Farnham, the Farnham Infrastructure Programme is still being worked on, with a number of options still being assessed, most recently, a hybrid option combining the two previous options²¹ is being modelled in terms of traffic and air quality; therefore the adopted package of agreed measures has not been defined. There is also, currently, no specific funding attached to the programme, and for these reasons, the measures for Farnham will be reviewed 6 months after adoption of this plan, in order to ensure that there is progress in the agreement and funding of measures. It will also be ensured that the Farnham AQMA will remain in place until the Farnham Infrastructure Programme is implemented.

²¹ These included Castle Street and Downing Street improvements and changing the traffic flow direction, and widening pavements on The Borough, Castle Street and Downing Street

Table 5.1 – Air Quality Action Plan Measures - Farnham

Measure No.	Measure	Category	Classification	Estimated Year Measure to be Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Target Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Potential Barriers to Implementation
1	Farnham Infrastructure Programme: Town Centre Changes	Traffic Management	UTC, Congestion Management, Traffic reduction	2023	2025	Surrey County Council, Farnham Town Council, Waverley Borough Council	SCC and external funding pots	No	Not funded	Depends on which option is taken forward	In planning stage – consultation response s being analysed prior to discussion with Member board	Achievement / maintenance of air quality objective compliance	Measured Concentration at Diffusion Tube Locations within AQMA	Consultation concluded October 2022	Air Quality Assessment still to be undertaken. Agreement between different tiers of Government, multiple approval processes, Funding, Officer time for implementation
2	Farnham Infrastructure Programme: Implementing outcomes of 'quick wins' project	Freight and Delivery Management	Route Management Plans/ Strategic routing strategy for HGV's	2022	2022	Surrey County Council, Farnham Town Council, Waverley Borough Council	SCC	No	SCC funded	<£25k	Environmental weight limit implemented to restrict HGV movements through the town centre	Achievement / maintenance of air quality objective compliance	Measured Concentration at Diffusion Tube Locations within AQMA, increase in Active Travel	Completed	Current concerns are (a) enforcement and (b) whether such restrictions should and could be implemented elsewhere in the area

Measure No.	Measure	Category	Classification	Estimated Year Measure to be Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Target Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Potential Barriers to Implementation
3	Farnham Local Cycling and Walking Infrastructure Plan (LCWIP)	Promoting Travel Alternatives	Promotion of Cycling Promotion of Walking	2023 for adoption of LCWIP	2033 for completion of implementation	Surrey County Council, Farnham Town Council, Waverley Borough Council	DfT	No	Not funded	LCWIP is strategic document outlining prioritised measures. Cost is dependant on what will be adopted – funding to be bid for	LCWIP currently being consulted on.	Achievement / maintenance of air quality objective compliance	Increase in Active Travel, Measured Concentration at Diffusion Tube Locations within AQMA	Town and Parish Councils have been consulted, due to go to committee by end of 2022	Dependent upon which schemes will be submitted by SCC as part of DfT's Active Travel funding tranches
4	Encouragement of Electric Vehicles ²² in Farnham through EV infrastructure	Promoting Low Emission Transport	Procuring alternative refuelling infrastructure to promote LEVs	2022	Ongoing through period of AQAP	Surrey County Council, Farnham Town Council, Waverley Borough Council	SCC OLEV	No	Partly funded	£100 - £500K	Ongoing	Achievement / maintenance of air quality objective compliance	Use of chargers, increase in proportion of EVs in the fleet in Farnham	Public EV Charging in Riverside Car Park 3 x 6CPs, and Brightwel	Funding, officer time for implementation

²² it is important to note that EVs are not viewed as a solution to all transport-related health issues. While EVs have significant air quality benefits over conventional petrol and diesel fuelled vehicles, they still create air pollution in the form of small particulates from the wear on brake discs and tyres, which can be harmful to human health. Walking, cycling and travel by public transport remain essential to improving air quality as well as tackling congestion and encouraging physical activity. As such, EVs need to be considered as complementary to a wider sustainable transport approach.

Measure No.	Measure	Category	Classification	Estimated Year Measure to be Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Target Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Potential Barriers to Implementation
	improvements, including the uptake of EV taxis and buses.													Is x 18CPs	
5	Consistent process for Air quality assessments for developments likely to impact on air quality, including committed development within and outside Waverley	Policy Guidance and Development Control	Planning Guidance	Ongoing	Ongoing	WBC and neighbouring authorities	Within existing budgets	No	n/a	Not explicitly costed as mainly staff time	Currently air quality assessments are requested, as well as mitigation where required. This measure will ensure consistency in the process	Long term targets for reduction in emissions in line with Defra targets	Number of planning applications reviewed and commented on	Ongoing	The process of assessment will ensure that cumulative impacts are incorporated where possible. Collaborative working across boroughs will take applications in neighbouring authorities into account
6	Waverley Clean Air Strategy	Policy Guidance and	Low Emissions	2023	2028 for completion of	Waverley Borough Council with partners,	Within existing budgets	Some projects may be eligible	Partially funded	£10k - £50k	Going through approvals process	Aimed at emissions reductions across Waverley.	Achievement of targets to be	Draft report available for	Resource issues with all organisations, as most of

Measure No.	Measure	Category	Classification	Estimated Year Measure to be Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Target Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Potential Barriers to Implementation
		Development Control	strategy		implementation	SCC, Parish Councils, etc		for Defra Grant funding			including consultation	Will tie in with targets announced by Defra	announced by Defra.	consultation	actions are not statutory

Table 5.2 – Air Quality Action Plan Measures - Godalming

Measure No.	Measure	Category	Classification	Estimated Year Measure to be Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Target Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Potential Barriers to Implementation
1	Waverley Clean Air Strategy	Policy Guidance and Development Control	Low Emissions strategy	2023	2028 for completion of implementation	Waverley Borough Council with partners, SCC, Parish Councils, etc	Within existing budgets?	Some projects may be eligible for Defra Grant funding	Partially funded	£10k - £50k	Going through approvals process including consultation	Aimed at emissions reductions across Waverley. Will tie in with targets to be announced by Defra	Achievement of targets announced by Defra.	Draft report available for consultation	Resource issues with all organisations, as most of actions are not statutory
2	Encouragement of Electric Vehicles	Promoting Low Emission Transport	Procuring alternative refuelling	2022	Ongoing through period	Surrey County Council, Godalming Town Council,	SCC OLEV	No	Partly funded	£100 - £500K	Ongoing	Achievement / maintenance of air quality	Use of chargers, increase in proportion of EVs in the	Public EV Charging in Crown Court	Funding, officer time for implementation

Measure No.	Measure	Category	Classification	Estimated Year Measure to be Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Target Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Potential Barriers to Implementation
	²³ in Godalming through EV infrastructure improvements, including the uptake of EV taxis and buses.		infrastructure to promote LEVs		of AQAP	Waverley Borough Council						objective compliance	fleet in Farnham	carpark x 2CPs, The Burys x 3CPs, Cattesha Il Lane x 6CPs and Station Rd Farncombe x 4CPs	

²³ it is important to note that EVs are not viewed as a solution to all transport-related health issues. While EVs have significant air quality benefits over conventional petrol and diesel fuelled vehicles, they still create air pollution in the form of small particulates from the wear on brake discs and tyres, which can be harmful to human health. Walking, cycling and travel by public transport remain essential to improving air quality as well as tackling congestion and encouraging physical activity. As such, EVs need to be considered as complementary to a wider sustainable transport approach.

Measure No.	Measure	Category	Classification	Estimated Year Measure to be Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Target Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Potential Barriers to Implementation
3	Consistent process for Air quality assessments for developments likely to impact on air quality, including committed development within and outside Waverley	Policy Guidance and Development Control	Planning Guidance	Ongoing	Ongoing	WBC and neighbouring authorities	Within existing budgets	No	n/a	Not explicitly costed as mainly staff time	Currently air quality assessments are requested, as well as mitigation where required. This measure will ensure consistency in the process	Long term targets for reduction in emissions in line with Defra targets	Number of planning applications reviewed and commented on	Ongoing	The process of assessment will ensure that cumulative impacts are incorporated where possible. Collaborative working across boroughs will take applications in neighbouring authorities into account

Quantification of measures

The actions within this AQAP have been developed based on the best available evidence of what works in securing emissions reductions within the currently declared AQMAs. Actions being implemented across different timescales, alongside other policy processes at local, national and international levels mean that it is rarely possible to definitively attribute specific actions to outcomes, as outcomes are often driven by multiple and inter-related factors and can be difficult to measure with current datasets. As part of this AQAP, WBC are liaising with Surrey County Council and Farnham Town Council to ensure that the Farnham Infrastructure Programme is quantified in relation to its impact on air quality. There has been qualitative work undertaken on air quality effects of different packages of measures. It has been agreed that the impacts of the 'hybrid' option will be quantified, both within the town centre, and at other locations where increases in traffic may be significant.

Many of the other measures within the Clean Air Strategy cannot be easily quantified, as they are ongoing interventions to be implemented over a number of years, and it is difficult to know what the impact will be specifically in the AQMAs. The measures within the Strategy, although have not been specifically quantified, are designed to reduce emissions more widely than just the exceedance area.

It is judged that the measures included within this AQAP, as well as the more general measures within the Clean Air Strategy will ensure that compliance with the air quality objectives are maintained.

Cost Effectiveness of AQAP Actions.

The Government does not expect authorities to undertake detailed cost-benefit analyses in their AQAPs. However, to provide an indication of cost effectiveness, the table below has been determined using best professional judgement to clearly set out impact (i.e., effectiveness) and cost in a qualitative way.

Waverley Borough Council

Measure No.	Measure	Impact	Cost	Lead Authority (Service Area)
1	Farnham Infrastructure Programme: Town Centre Changes	Potentially medium to high depending on what is implemented	Depends on which option is taken forward	Surrey County Council, Farnham Town Council, Waverley Borough Council
2	Farnham Infrastructure Programme: Implementing outcomes of 'quick wins' project	Low	£50k - £100k	Surrey County Council, Farnham Town Council, Waverley Borough Council
3	Farnham Town Centre Local Cycling and Walking Infrastructure Plan (LCWIP)	Potentially low to medium depending on what is implemented	Dependant on what will be adopted – funding to be bid for	Surrey County Council, Farnham Town Council, Waverley Borough Council
4	Encouragement of Electric Vehicles in Farnham through EV infrastructure improvements, including the uptake of EV taxis and buses.	Medium	£100 - £500K	Surrey County Council, Farnham Town Council, Waverley Borough Council
5	Consistent process for Air quality assessments for developments likely to impact on air quality, including committed development within and outside Waverley	Potentially Medium to high in the longer term	Not explicitly costed as mainly staff time	WBC and neighbouring authorities
6	Waverley Clean Air Strategy	Low to medium within AQMAs	£10k - £50k	Waverley Borough Council with partners, SCC, Parish Councils, etc

Impact: *Low* – would reduce emissions, but not measurable by air quality monitoring and would be termed 'negligible' using industry standard guidance for modelling the impacts of developments; *Medium* - a change could be detected using an air quality model such as the NMF, but unlikely to be measurable by air quality monitoring; *High* – a change could potentially be monitored using standard monitoring techniques. It should be noted that the impact is based on NO₂, not PM_{2.5}.

Cost: Select from < £10k/£10k - £50k/£50k - £100k/£100k - £500k/£500k - £1m/£1m - £10m/ > £10m (aligned with ASR categories for reporting)

Appendix A: Response to Consultation

A summary of the consultation responses (both through an online questionnaire and direct responses to the Council) are included in an appended document highlighting the consultation responses (to both Clean Air Strategy and Action Plan), and changes made in each of the documents, or actions taken.

Waverley AQAP and Clean Air Strategy: Review of Consultation Responses

February 2023



Experts in air quality
management & assessment

Document Control

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1 Introduction

- 1.1 Consultation was undertaken by Waverley Borough Council on two documents, the Air Quality Action Plan and the Clean Air Strategy, between 5th December 2022 and 15th January 2023. The consultation process consisted of a range of engagement including emails directed to the Air Quality Steering group, all Waverley Borough Council (WBC) councillors, town and parish clerks and councillors, schools, GP surgeries and statutory consultees (Surrey County Council, neighbouring authorities, National Highways, Environment Agency and Chamber of Commerce). This short note provides an overview of consultation responses, WBC's response to points raised, and summarises where changes will be made in both documents.
- 1.2 There were 17 responses in total; 8 responses to the online questionnaire, 1 response through the website, and 8 by email. Seven of the questionnaire responses were from residents, and one from a neighbouring authority. The website and email responses were received from members of the public, neighbouring authorities, WBC councillors and Parish Councillors. In addition, the Overview and Scrutiny Committee were consulted at a meeting, and the outcomes of this have also been added to the list of consultation comments.

2 Summary of Responses

- 2.1 The following themes have been extracted from the consultation responses (amalgamating all responses from online questionnaire, those received directly by email, through the website, or from the Overview and Scrutiny Committee). Responses to the themes have been provided below and actions further summarised in section 3 of this note. The consultation responses themselves are summarised in Appendices A1 and A2.

Concern about increases in emissions from the level crossing on Station Hill and specifically anti-idling issues

- 2.2 Concerns are noted. Actions are proposed in the Clean Air Strategy, under WBC commitment B7 (which has been widened out to include all level crossings) '*We will work with SCC to tackle vehicle idling emissions at key locations such as on Station Hill in Farnham, other level crossings and outside schools*'. Additionally, we will engage with Network Rail to see if there are any actions they can take regarding the level crossing.

The need to incentivise public transport (to make it low cost, reliable and low emission).

- 2.3 It is agreed that this is a key priority, but one for which Waverley Borough Council will need to work with Surrey County Council to take forward. There is a commitment within the Clean Air Strategy (CAS), under C1 to work with Surrey County Council (SCC) on delivering LTP4 which includes improvements to public transport.

Include Park and Ride in the AQAP (for example consideration of two-way facility at Artington site)

- 2.4 It is considered that the centres of Farnham and Godalming are not large enough to sustain their own Park and Ride facilities. Also, the cost of setting up a new Park and Ride service, even from an existing Guildford Borough Council site, is not considered a proportionate response to the existing air quality issues within Waverley. The idea has, however, been discussed with Surrey County Council, and will be considered in the future if appropriate.

Comments Regarding Planning System, including cumulative impacts (and specifically the approval of Dunsfold Park)

- 2.5 It is agreed that, particularly in the longer term, the planning system is critical to both maintain existing good air quality and improving air quality into the future. Air quality assessments for new developments are reviewed and as part of that process, WBC ensures that the cumulative impact with other planned development, within and outside the borough is taken into account. WBC plan to issue some good practice guidelines to developers to help inform their air quality assessments, under

proposed measure 5 in the AQAP (see AQAP Table 5.1). The Strategy cannot oppose specific developments, but does provide a process within which air quality can be fully considered within the planning process.

The AQAP only addresses areas in Godalming and Farnham

- 2.6 The AQAP is a statutory document which addresses any exceedances of the statutory air quality objectives within Air Quality Management Areas, which are declared in Godalming and Farnham. This is a Defra requirement through the Environment Act 1995 and 2021. In order to address reductions in emissions more widely across the borough, which is agreed should be a priority, the Clean Air Strategy has been developed. The Clean Air Strategy incorporates a wider range of priority actions, including commitments for WBC, but also provides a framework within which others can act to improve air quality.

Timescales on commitments in Clean Air Strategy to be updated to be more explicit

- 2.7 The Clean Air Strategy has been updated to incorporate this.

AQAP to include section on uncertainty (of monitoring)

- 2.8 The AQAP has been updated to incorporate this.

Safety issues, particularly those around active travel (which will disincentivise people to walk and cycle), for example, making lighting better on unlit footpaths, ensuring on road cycle lanes are better segregated.

- 2.9 It is agreed that safety is a key issue in the encouragement of active travel. SCC includes modal shift to active travel as a key policy within LTP4, with a key aim to provide a safe, attractive, accessible and connected network. Delivery will largely be through the Local Cycling and Walking Infrastructure Plan (LCWIP) process. The specific feedback received within this consultation has been discussed with Surrey County Council.

Increase Air Quality Monitoring

- 2.10 Air quality is monitored across the borough, at locations which reflect relevant exposure to pollutants (i.e., where members of the public are exposed over the time period of the objective), where the risk of air quality objectives being exceeded is highest. This approach is in line with current technical guidance issued by Defra. Although the number of monitoring locations could increase, this needs to be balanced with resourcing and at present it is considered that the current monitoring strategy is fit for purpose and is proportionate to air quality issues within Waverley. A review of monitoring locations was undertaken in 2019 and in some cases, monitoring sites relocated.

Technology will solve air quality issues, so no need for either document, or more measures

- 2.11 Health effects are apparent even below current air quality objectives. Although technology will improve air quality into the future, the Council want to go further. The Council's strategic objectives for improving the health and wellbeing of its residents and communities is supported by the AQAP and Clean Air Strategy.

Farnborough Airport should be included

- 2.12 It is recognised that locally there is concern about emissions from Farnborough Airport. However, from an air quality perspective, it is unlikely that the numbers of flights will pose a significant source of NOx emissions from aircraft. Government technical guidance on the consideration of airports provides a criteria of above 10 million passengers per annum (or equivalent freight also given) before an airport is required to be included in the local air quality management process. The airport is outside of WBC's area, but WBC will continue to work with neighbouring authorities on issues which will be of relevance to air quality.

Traffic light phasing (specifically in Godalming)

- 2.13 This specific point has been passed onto Surrey County Council.

Parked cars on Eashing Lane and Ockford Road (increasing emissions by increasing stop start traffic)

- 2.14 This specific point has been passed onto Surrey County Council parking team.

Need to have higher priority regarding bonfires

- 2.15 Bonfires are included within the CAS with a commitment to encourage people not to have bonfires, through awareness campaigns. In the longer-term bylaws will be investigated to tackle this issue. Currently, there is no legislation available to ban bonfires as long as they take place within certain rules. Retrospectively where they cause nuisance, the Council can take action.

Need to make electric vehicles more affordable/ provide subsidies for renewable energy

- 2.16 It is agreed that people are more likely to switch to more renewable energy and vehicles where subsidies or grants are provided. However, this is not an action that can be undertaken at local level within current resources. WBC and SCC are putting resources into developing the EV charging infrastructure in Waverley.

The AQAP should detail specific actions to be taken as part of the Farnham Infrastructure Plan

- 2.17 More specific information on actions to be taken would be welcomed. The Council has contacted Surrey County Council for more information. However, it is recognised the plan is currently under development. The Council will continue to engage with Surrey County Council and it has been agreed that the 'hybrid option' put forward to the Farnham Infrastructure Programme Board will be quantified in terms of air quality impacts, which will add to the evidence base for decision making.

Future Air Quality may get worse

- 2.18 We will continue to monitor air quality in Farnham to check if levels start to increase. Notably, roadside concentrations of nitrogen dioxide have been decreasing and are predicted to decrease further given national policies on tighter vehicle emissions and the move to adopt EVs.

Source apportionment shows exceedances

- 2.19 The modelling study presented in the AQAP was undertaken for 2017 across Surrey. Source apportionment locations chosen were not necessarily relevant locations. They were chosen to try and identify the sources and relevant proportions of the sources to nitrogen dioxide pollution in that location. Further, the model was corrected to measured air quality Surrey wide. Unfortunately, this did not include any monitoring data in Waverley. Therefore, the monitored concentrations are a more robust reflection of concentrations than the modelled concentrations in 2017, which were included in the AQAP as the most recent analysis of sources (which will not have changed to the same degree).

Relevant locations and distance correction don't reflect concentrations

- 2.20 Air quality objectives are only relevant where someone could be exposed over the averaging period, such as the façade of residential buildings for the annual air quality objective for nitrogen dioxide and pavement cafes for the hourly objective for nitrogen dioxide. Nitrogen dioxide diffusion tube monitoring locations were reviewed in 2019 to make sure they were at the facades of properties or representative of facades of properties and did not need to be distance corrected. There is no evidence that the hourly nitrogen dioxide objective is currently being exceeded at any location in Waverley. Monitoring is clearly explained and openly reported on an annual basis within the Annual Status Report.

Consultation arrangements aren't robust enough

- 2.21 As outlined in paragraph 1.1 the consultation process consisted of a range of engagement including emails directed to the Air Quality Steering group, all Waverley Borough Council (WBC) councillors, town and parish clerks and councillors, schools, GP surgeries and statutory consultees (Surrey

County Council, neighbouring authorities, National Highways, Environment Agency and Chamber of Commerce).

Clean Air Strategy – 2 documents not required.

- 2.22 The 2 documents are designed to complement each other. The draft AQAP has been produced as part of the council's statutory duties required to reduce nitrogen dioxide in the Farnham and Godalming Air Quality Management Areas. The draft CAS has a wider brief and aims to reduce nitrogen dioxide and fine particulates across the Borough to improve air quality. Further, if nitrogen dioxide concentrations do not exceed any air quality objectives over the next few years it might be appropriate to consider if the Council should revoke the Farnham (but only after the Farnham Infrastructure Plan changes have been implemented and monitored) and Godalming air quality management areas. If that happens the formal AQAP for Farnham and Godalming would cease to exist, but we will still have a plan in place to tackle air pollution in the Borough. This is a new requirement for Councils who do not have air quality action plans from 2023. However, we have developed a CAS now given the increasing awareness of the dangers posed by poor air quality and the council's strategic objectives for improving the health and wellbeing of its residents and communities.

3 Summary and Conclusions

- 3.1 Responses to the consultation were wide ranging in comment and topics covered. The questionnaire responses were not clear cut in terms of support or not for the documents, although the more substantive comments made by email or via the webpage suggested broad support for both documents.
- 3.2 A number of themes have been identified which are responded to in section 2 of this note.
- 3.3 The following changes to the documents have been undertaken, alongside some other minor changes to reflect discussions at the final Steering Group Meeting:
- Timescales on commitments in Clean Air Strategy to be updated to be more explicit;
 - AQAP to include section on uncertainty (in measurements); and
 - AQAP to include specific actions as part of the Farnham Infrastructure Plan, if possible.
- 3.4 The following issues have been discussed with Surrey County Council:
- Concern about increases emissions from the level crossing on Station Hill and specifically anti-idling issues. This includes ongoing discussions around the feasibility of having an electronic sign linked to the level crossing being closed.;
 - Safety issues, particularly those around active travel (disincentivising people to walk and cycle). For example, making lighting better on unlit footpaths, ensuring on road cycle lanes are better segregated;
 - The need to incentivise public transport (to make it low cost, reliable and low emission);
 - Park and Ride in the AQAP (at Artington site);
 - Traffic light phasing (specifically in Godalming);
 - Parked cars on Eashing Lane and Ockford Road (increasing emissions by increasing stop start traffic); and
 - The Farnham Infrastructure Plan.
- 3.5 Concerns about ant-idling by the level crossing on Station Hill will be raised with Network Rail.

4 Appendices

A1	Comments from Webpage and by Email	9
A2	Overview of Questionnaire Responses	13

A1 Comments from Webpage and by Email

Date	From	Comments
9 Dec 22 (web page)	Member of public (CB)	Thank you for this initiative. I wonder if we could do something about the long wait at the level crossing where the fumes are terrible. We need a tunnel or a bridge! Or at least raising and lowering the barriers so that there is not such a long wait.
9 Jan 23 (email)	Member of public (H)	Amongst the recommendations for the public on how to reduce pollution is: switch off your engine while sitting in the traffic. Now, I have been doing that for a long time. I wonder though why the Government /company /utility and any other commercial vehicles (including ambulances) are not obliged to switch their engines off while idling? They ought to serve as an example to the private drivers. I have occasionally asked the idling drivers to do that, only to be told off and disregarded. Maybe a campaign like “stop pollution while idling your engine” along with fines for offending drivers could be included in the strategy?
16 Jan 23 (email)	Member of public (AS)	I am very supportive of improving air quality and the direction of WBC’s Air Quality Action Plan. I do however feel there is one significant strategic element missing; this is the need to urgently incentivise people to use public transport NOW instead of older petrol or diesel private cars and vans. Public transport needs to be low cost, frequent, reliable and low emission to encourage people out of private high emission vehicles. It will take many years to transition to majority EV vehicles and in the meantime low emission public transport needs to fill the gap. I therefore urge Waverley BC and Surrey CC, to phase out the old diesel buses and rapidly introduce low cost, more frequent, more reliable and low emission public buses on all routes across Surrey. Without this, air quality will not be seriously improved. At present for example a family travelling by bus from Womersh Parish to Guildford and back, will pay an order of magnitude higher cost for a service that is infrequent and unreliable, using old high emission buses, and instead will use their car for much lower cost and convenience. Changing this equation is the strategic element missing.
12 Jan 23 (email)	Pollution Team Leader East Hampshire DC	Thank you for consulting us on Waverley Borough Council’s Draft updated Air Quality Action Plan and Draft Clean Air Strategy. I have reviewed the documents and agree with the actions and strategies proposed to improve local air quality across Waverley. Please do not hesitate to contact me if you require any further information.
17 Jan 23 (email)	Senior Specialist Environmental Protection, Guildford BC	The documents are logical and appear to show a clear direction. Guildford Borough Council Regulatory Services would like to offer support to help achieve the objectives and actions outlined in the two draft documents above. Whilst it is appreciated that there are differences in the timescales of both authorities, we are predominantly facing road transport

		<p>related air quality problems on the same roads particularly with respect to the A281, A3100 and A3. In particular we intend to:</p> <ol style="list-style-type: none"> 1. Support any Waverley BC steering/ working groups with attendance by at least one officer. 2. Reciprocate any arrangements re Guildford BC steering/ working groups to invite Waverley BC officers to attend as appropriate. 3. Provide and share information on traffic surveys and consequent air quality modelling. 4. Take opportunities to share resources and initiatives as appropriate. 5. Comment and consult on planning applications that have cross border implications. I understand that the GBC Development Management Policies as part of the Local Plan Process will be in place in spring 2023, it includes a section on air quality. 6. Support any joint sustainable travel options, whilst I cannot see any mention of Park and Ride. Is there any benefit in looking at the feasibility of a two way facility at the Artington site?
2 Dec 22 (email)	Cllr Townsend (WBC)	<p>This looks great. Small thing but on the AQAP draft doc the table on the bottom of page 14 is split across the next page I think which makes it a bit difficult to read, perhaps consider moving on to P15, appreciate that moving this might affect other pages.</p>
8 Dec 22 (email)	Cllr Seaborne (WBC)	<p>I just went to look something up in the consultation versions of the Clean Air Strategy and the ACQP and although I was able to find the consultation through a search on the website the consultation does not appear in the Consultations part of the Waverley website, which was my first port of call:</p> <p>https://www.waverley.gov.uk/Services/Council-information/Consultations-and-getting-involved</p> <p>Would it not be appropriate to have a box on that page for either Environmental Consultations or Climate Emergency Consultations and with a subsequent link to the Clean Air Strategy and the AQAP, so that this consultation is accessed in the same way as many other recent consultations?</p> <p>Can I take this opportunity to say thanks for incorporating the points I made at the November board meeting into the strategy. I think the changes make for a more useable document.</p>
15 Jan 23	Cllr Hyman	<p>Main points as summarised:</p> <ul style="list-style-type: none"> • Proposed SCC actions in Farnham have a lack of detail and funding; • Need to take cumulative impacts on air quality into account within planning; • Future Air Quality may get worse; • Source apportionment shows exceedances; • Relevant locations and distance correction don't reflect concentrations; • Consultation arrangements aren't robust enough; and • Clean Air Strategy – 2 documents not required.

19 Dec 22 (email)	Cranleigh Parish Cll	Good Morning. The Parish Council discussed the draft Clean Air Strategy for Waverley at their Council meeting last week. The Parish Council would like to comment that they support air quality monitoring in Cranleigh.
12 Jan 23 (email)	Bramley Parish Cll	<p>Bramley Parish Council is supportive of Waverley's focus on clean air evidenced through the Clean Air Strategy. However, Bramley Parish Council does not regard Waverley's intent in this strategy as being consistent with their decision to authorise the largest ever new settlement in Waverley Borough at Dunsfold Park in a car-dependent location.</p> <p>Bramley already suffers significant pollution impacts from congestion along the A281. Waverley's decision to allow the Dunsfold Park development will significantly increase traffic, congestion and air quality issues regardless of the proposed traffic alleviation measures.</p> <p>The proposals in the Clean Air Strategy are welcome and supported but, for Bramley, their positive impact will be dwarfed by the negative consequences of Waverley's support for a new settlement, larger by far than Bramley itself, in a location that will force substantially increased lorry and car movements along an already congested and polluted road.</p> <p>If Waverley is serious about its Clean Air Strategy it will update the report to provide an assessment of the pollution impacts of the Dunsfold Park development and use that data to reconsider its support for such a large car-dependent development or at least demonstrate (if it can) how its support for Dunsfold Park will be consistent with that Clean Air Strategy.</p> <p>Additionally, Bramley Parish Council would also point out that the Waverley Air Quality Action Plan only addresses areas in Guildford and Farnham. We appreciate that this has been constructed in a standard format for submission to the government but would suggest that the tabulated material in the Strategy Document is largely the action plan for the rest of the borough. We think that there should be one high level strategy and one detailed plan covering the entire borough and not just the two Air Quality Action areas. By doing that all actions will end up in the same format, and the plan will be a true Waverley AQAP and not just one for Farnham and Godalming.</p> <p>I would be grateful if you would take Bramley Parish Council's comments into consideration.</p>
9 Jan 23 (meeting)	WBC Overview and Scrutiny	<p>Actions required:</p> <ul style="list-style-type: none"> • A target date be included on each commitment rather than 'short, medium and long term'. This will allow the Services O&S and Executive to monitor progress. • Annual update to be presented to Services O&S to allow monitoring of the progress of each of the commitments. • AQAP to include how to quantify the uncertainty and ways to deal with this. • Obtain information from Public Health on level of illnesses caused by pollution split down into ward level.

		<ul style="list-style-type: none">• Communications Strategy to be developed to raise public awareness and provide educational tools.
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A2 Overview of Questionnaire Responses

A2.1 In response to the question 'Do you agree with the measures within the draft updated Actin Plan to improve air quality within the AQMAs', 2 responded yes, 3, no and 3 not sure. Reasoning for the response included:

- The air quality in Farnham town and by the station is noticeably poor. The first step should be the infrastructure to allow people to travel safely without having to use their cars. Further monitoring stations would be helpful to ascertain where air pollution is improving or declining. I'm not clear how raising the monitoring station in the Borough will give an accurate result of the air pollution at ground level. My children would ride to school if there was a safe route and the school had anywhere to keep their bikes;
- Unclear what specific actions are being proposed;
- Technology is changing constantly, and there is simply no need to take these measures at the cost of business, liberty and freedoms; and
- Comprehensive list of measures proposed in line with options that are available to improve air quality.

A2.2 In terms of further targeted measures, 3 respondents provided suggestions:

- You have not included the air pollution caused by low flying jets in and out of Farnborough Airport. There is a significant increase in overflying and the area above Farnham was described the 'motorway in the sky' by the company. There needs to be consideration and accountability for this in the plan given that the council agreed to it in 2014 and Waverley have not held FACC to account whilst declaring a Climate Emergency themselves;
- Encouraging people to walk and cycle from nearby villages. Make cycling safer by having separate cycle lanes from motor traffic. Encouraging children to cycle to school. Greater school bus provision or park and ride. I regularly see long queues of traffic outside Waverly Abbey which has a large carbon footprint as well as a waste of time; and
- In Godalming there is a lot of traffic build up from Squires garden centre, Eashing lane through to Waitrose. The traffic lights and inappropriate parking. The traffic lights sit at red when nobody is crossing the road outside Waitrose. This holds up the traffic for no reason at all, leads to a build up of traffic and therefore increased emissions. The same situation occurs at the other end of the Godalming inner relief road at the traffic lights near the Richmond arms. The traffic lights should turn red when an individual pushes the button on the pedestrian crossing, not have a timed system. Inappropriate parking contributes to increased emissions. cars park on the pavement at the bottom of the Eashing lane, and on the corner of bend between Cliff Rise and Eashing lane. Again, cars have to slow down to get round this hazard, and this in turn increases emissions. Double yellow lines are needed at the bottom of Eashing

lane and on the corner of bends. This is always a problem due to the road narrowing and residents parking anywhere. On Ockford road the parking space needs to be shortened slightly because when cars park in the last space nearest the Inn on the lake roundabout it slows traffic because half the carriage way is taken up with a parked car. This slows traffic as cars have to be careful going past as they have to cross the white line in the middle of the road. The slowing of the traffic also adds to emissions.

A2.3 In response to the question 'Do you agree with priority actions in the draft strategy', 2 responded yes, 3, no and 2 not sure. Reasoning for the response included:

- There is no page 25. Bonfire reduction should be more urgent. Waverley offer more take away of garden waste to reduce bonfires. This can then be composted.

A2.4 In terms of other priority actions, 2 respondents provided suggestions:

- As described earlier...Increase Monitoring. Provide better infrastructure. Hold Farnborough Airport accountable for its emissions; and
- Cycle lanes need to be more than painted lines on pavements, they need to be separate tarmac lanes where possible. Off road paths will only suit a small amount of bike riders and are no good when it rains.

A2.5 1 respondent had suggestions regarding the Councils commitments for actions:

- It is good that they are addressing the problem, but action needs to happen. Simple things like altering phasing of traffic lights can be a big help.

A2.6 When asked how important they thought improving air quality is, 2 were neutral, 2 thought it was important, 3 responded very important, and 1 not important (who followed up with the comment 'Air is improving along with technology, it should not be a priority').

A2.7 When asked 'Would you be prepared to make any lifestyle changes to improve air quality within Waverley, 4 responded:

- Upgrade to a low emission vehicle such as electric; Only burn dry well seasoned wood or smokeless fuel at home; Reduce what I burn at home; Cycle more often for short journeys; Walk more often for short journeys; Change how I heat my home to a renewable option;
- Walk more often for short journeys; Cycle more often for short journeys; Use public transport more often; Upgrade to a low emission vehicle such as electric; Walk or cycle for school journeys; Change how I heat my home to a renewable option;
- Cycle more often for short journeys; Use public transport more often; Change how I heat my home to a renewable option; and

- Walk more often for short journeys; Cycle more often for short journeys; Change how I heat my home to a renewable option; Upgrade to a low emission vehicle such as electric.

A2.8 In terms of what would help to make these changes easier for you, the following responses were received.

- Dedicated cycling facilities;
- Subsidies for renewable energy. I think if communities felt Waverley were willing to take on the big polluters they would feel more incentivised to change themselves;
- More accessible and regular public transport. Better cycle lanes separate from traffic; and
- Having good quality street lights on footpaths that have none. Cutting back trees that cover street lights so they are effective! Not shrouded in branches and leaves e.g. the road from Milford, past the golf course and up to the station. Not taking away grants for electric vehicles, this means they will only be bought by the rich who can afford them.

A2.9 2 respondents felt they were more affected by air pollution than others, 1 with young children, the other with respiratory illness.

Appendix B: Reasons for Not Pursuing Action Plan Measures

Table B.1 – Action Plan Measures Not Pursued and the Reasons for that Decision

Action category	Action description	Reason action is not being pursued (including Stakeholder views)
No action specifically discounted		

Appendix C: Clean Air Strategy

Clean Air Strategy for Waverley (Draft)

February 2023



Foreword

Foreword from the Portfolio Holder

A message to everyone living and working in Waverley, including Town and Parish Councils, Businesses, Schools, other organisations, the medical profession and the public

There is growing evidence that air pollution, even when experienced at very low levels, is damaging to human health. This led the World Health Organisation to recently revise its guideline for what it considers a safe level of exposure of particulate pollution, bringing most of the world (97.3% of the global population) into the unsafe zone.

The government provides parameters for an area to be designated an air quality management area. There are two in Waverley: one in Farnham Town Centre and one along Ockford Road in Godalming, both due to traffic emissions causing elevated levels of nitrogen dioxide. An action plan has been updated for these specific areas to secure and maintain air quality below the annual objective for nitrogen dioxide.

However, in light of the increasing awareness of the dangers posed by poor air quality at levels significantly below the levels set by the UK government, the council wants to do more. Accordingly, we are adopting this Clean Air Strategy to encourage actions to improve air quality across the borough, reducing levels of fine particulates and nitrogen dioxide. This is consistent with the Council's strategic objectives for improving the health and wellbeing of our residents and communities, taking action on the Climate Emergency and protecting the environment.

Everyone has an interest in the quality of the air we breathe. By acting together to reduce emissions of nitrogen dioxide and fine particulates we can improve air quality. This strategy sets out our key priorities and actions we propose to take. We encourage others to follow our example and consider what actions they can take to improve air quality.

With best wishes

[Signature]

Steve Williams, Portfolio Holder for Environment & Sustainability

Contents

1	Introduction	4
2	Aims and Objectives of the Air Quality Strategy	5
3	Air Quality Context	6
4	Policy Context	10
5	Actions	14
6	Waverley Borough Council's Commitments.....	16
7	Template for Adoption of Actions by Others	24
	Figure 1: Average Background Annual Mean NOx Contribution in Waverley (µg/m3)	8
	Figure 2: Average Background Primary Annual Mean PM2.5 Contribution in Waverley (µg/m ³)	9
	Figure 3: Summary of Relevant Policy and Wider Context of the Strategy	13

Document Control

Version	Version Status (Draft, Approved /Published Internally or Externally)	Date	Version Comment
Version 1.0	Draft for Special Emergency Climate Board	4/11/22	Draft for discussion
Version 1.1	Draft - incorporates comments from Special Emergency Climate Board	10/11/22	Draft for Executive Briefing
Version 1.2	Draft – incorporates feedback from internal stakeholders	24/11/22	Draft for public consultation
Version 1.3	Draft – incorporates feedback from public consultation	09/02/23	Draft for internal approval

1 Introduction

- 1.1 Air pollution has been linked with several long-term health conditions, including cancer, asthma, heart disease, obesity and changes linked to dementia. Additionally, air pollution particularly affects the most vulnerable in society: children and older people. There is also often a strong correlation with equalities issues because areas with poor air quality are also often the less affluent areas.
- 1.2 The Council has statutory responsibilities for air quality, governed by Part IV of the Environment Act 1995 and Part 4 of the Environment Act 2021. The legislation places an obligation on all local authorities to regularly review and assess air quality in their areas, and to determine whether the UK air quality objectives are likely to be achieved. Councils are required to produce an Annual Status Report (ASR) which provides an annual update on monitoring data; measures to improve air quality; newly identified issues; and progress made is submitted to Defra for approval. Where air quality objectives are not met, and an Air Quality Management Area is declared, an Air Quality Action Plan is a further requirement which also needs submission to Defra. This Strategy will provide a mechanism for reducing emissions further than our statutory requirements, whilst supporting measures highlighted in the ASR, and will outline how we plan to effectively tackle air quality issues across the borough.

2 Aims and Objectives of the Air Quality Strategy

2.1 The vision of the Waverley Corporate Strategy¹ is that Waverley will be environmentally, economically and financially sustainable with healthy, inclusive communities and housing available for all who need it. This includes strategic priorities as follows:

- Local, open, participative government
- Supporting a strong, resilient local economy
- Taking action on Climate Emergency and protecting the environment
- Good quality housing for all income levels and age groups
- Effective strategic planning and development management to meet the needs of our communities
- Improving the health and wellbeing of our residents and communities

2.2 In light of the strategic priorities of the Council, this strategy has the overarching **aim to maintain and improve air quality across the Borough**. In working towards this aim, the following objectives have been set:

- To demonstrate leadership in improving air quality
- To work collaboratively with partners to improve air quality within the Borough
- To support and enable behaviour change to improve air quality directly.

2.3 Actions to achieve these aims are outlined in sections 5 and 6.

¹ Available at <https://www.waverley.gov.uk/Services/Council-information/About-Waverley-Borough-Council/Corporate-Strategy-2020-25>

3 Air Quality Context

What are the main pollutants of concern?

- 3.1 The main pollutants of concern are nitrogen dioxide and particulate matter (small dust particles made up of a variety of different chemicals and metals). Each has different sources, health effects and chemical behaviours.

What is nitrogen dioxide (NO₂)?

- 3.2 Nitrogen dioxide (NO₂) is a gas produced as a result of fossil fuel combustion processes. Its presence in air contributes to the formation and modification of other air pollutants, such as ozone and particulate matter, both of which are also harmful to health. Breathing air with a high concentration of NO₂ can irritate the airways in the lungs.

What is Particulate Matter?

- 3.3 Particulate matter is the most important air pollutant in terms of health effects and is different from the gaseous pollutants in that it is not a clearly defined chemical compound. It is a mixture of small particles which are usually described by their size. PM₁₀ are particles below 10 micrometres in diameter and PM_{2.5} are below 2.5 micrometres (approximately 30 times smaller than the width of a human hair). The larger particles can penetrate into the upper airways, while PM_{2.5} can penetrate deeper into the lungs. Both groups contain much smaller particles which are much more numerous and can penetrate all areas of the lungs and even pass into the bloodstream or brain.

What are the health effects of air pollution?

- 3.4 There is ever-growing evidence for the connections between air pollution and heart and lung health and the link to premature mortality, with connections also being made to other conditions such as diabetes, dementia, mental health and birth outcomes, and more recently potential links to Covid-19.
- 3.5 Some of the effects occur over a short period, from minutes to days, whereas others result from long term exposure. Air pollution is known to cause some conditions, and also exacerbate existing conditions, such as triggering an asthma attack. These short- and long-term health effects are reflected in the air quality objectives, which have both short- and long-term averaging times for pollution measurements.
- 3.6 While the majority of the published evidence relates to the long-term impacts of fine particulate matter (PM_{2.5}), evidence is also strengthening for the health impacts of nitrogen dioxide (NO₂), mainly around pulmonary and cardiovascular effects and the link to premature mortality.
- 3.7 It is generally accepted that air pollution can be harmful to anyone. However, some people are more likely to suffer than others because they live in deprived areas, which often have higher

levels of air pollution; they live, learn or work near busy roads; and/or are more susceptible because of their age or existing medical conditions. Therefore, groups that can be considered vulnerable include, but are not limited to, the old, the young, deprived communities and those with existing health conditions.

- 3.8 Further information on the health effects of air pollution can be found [here](#).

What is Air Quality like in Waverley?

- 3.9 Air Quality in Waverley is generally good. There are currently two small areas with historical exceedances of an air quality objective in Godalming and Farnham. These areas are designated Air Quality Management Areas (AQMAs) and have been declared for exceedances of the annual mean nitrogen dioxide objective. In Godalming, there was a marginal exceedance just outside the AQMA on Ockford Road in 2019. Since 2019, concentrations at this site have been well below the objective.
- 3.10 In Farnham, the exceedance is restricted to one monitoring site which is located on The Borough, in 2019. However, the site is at ground floor level, with relevant exposure² in flats above the shops. A monitoring site has been situated higher up the building to represent relevant exposure and concentrations have been below the objective in both 2019 and 2021 (with no data available for 2020). Although the exceedances are marginal in 2019, actions to improve air quality at these locations are set out in an Air Quality Action Plan, which has been developed alongside this Strategy, which is in line with Waverley Borough Council's (WBCs) statutory requirements (see section 4).
- 3.11 It should be noted that although a monitoring site on Upper Hale Road in Farnham is currently measuring concentrations marginally higher than The Borough, this is below relevant air quality objectives.
- 3.12 Waverley Borough Council's Annual Status Reports can be found at <https://www.waverley.gov.uk/Services/Environmental-concerns/Pollution-control/Air-quality/Air-quality-reports>.

What are the main sources of pollutants in Waverley?

- 3.13 NO₂ is both a primary and a secondary pollutant. In other words, it is both emitted directly from polluting sources and is also formed from chemical reactions of pollutants in the atmosphere. Nitrogen oxides (NO_x – a combination of NO and NO₂) is produced when fossil fuels (coal, natural gas and so on) are burned. Road transport is the largest source of NO_x overall in Waverley as shown in Figure 1.

² Air Quality Objectives only apply where members of the population are exposed for the time period over which the objective is measured, in this case over the period of a year, which is generally taken as the facades of residential properties, schools, hospitals etc.

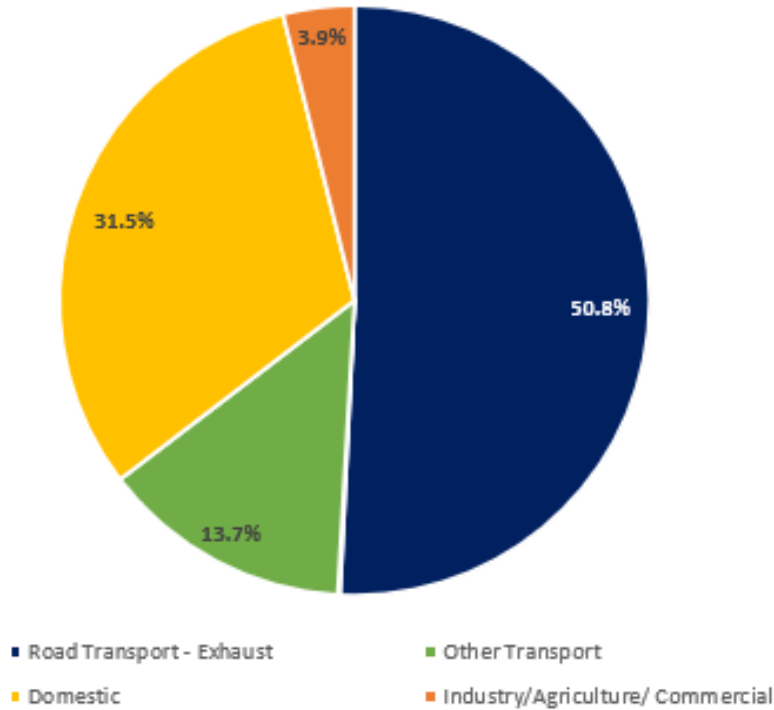


Figure 1: Average Background Annual Mean NOx Contribution in Waverley ($\mu\text{g}/\text{m}^3$)

3.14 Particulate matter is a mixture of both primary and secondary components, which contains those which are either human-made or naturally occurring. Sources of primary particles include combustion processes, such as diesel engines and woodburning, but can also include mechanically derived particles such as tyre, brake and road wear, windblown dusts (including, for example, dust from the Sahara) and sea salt. Mechanically derived particles tend to be larger in size (PM_{10}) whereas combustion derived particles are smaller ($\text{PM}_{2.5}$). Fine particles and, in particular, secondary particles³ can travel long distances and are known as transboundary pollutants. This means that the particles measured in Waverley, often originate from emissions far beyond their boundary. Figure 2 shows the origins of primary $\text{PM}_{2.5}$ (as an average) across Waverley.

³ Secondary particles occur due to chemical reactions in the atmosphere generally downwind some distance from the original emission source

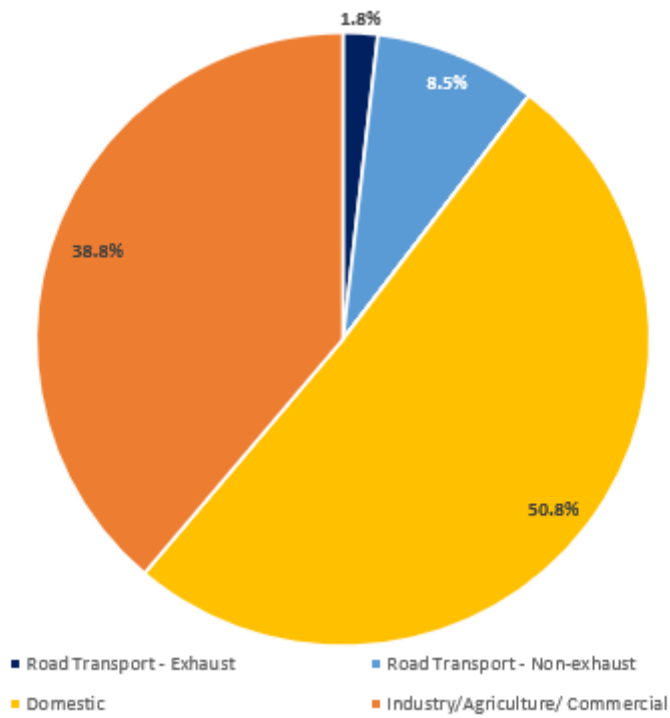


Figure 2: Average Background Primary Annual Mean PM_{2.5} Contribution in Waverley (µg/m³)

4 Policy Context

Air Quality: the Role of Local Authorities

- 4.1 The [UK Air Quality Strategy](#) (AQS), released in July 2007, provides the overarching strategic framework for air quality management in the UK and contains national air quality standards and objectives established by the Government to protect human health. The AQS provides the framework for local authorities to implement Local Air Quality Management (LAQM), which includes annual reviews of air quality, and measures being implemented at local level to improve Air Quality Management Areas, which are then reported to the Government. The Defra [Clean Air Strategy 2019](#) sets out a wide range of actions by which the UK Government will seek to reduce pollutant emissions and improve air quality. Actions are targeted at four main sources of emissions: Transport, Domestic, Farming and Industry. The AQS is due to be updated by Government in 2023.
- 4.2 Measures to improve air quality are being implemented by all levels of Government. Waverley has a corporate priority to improve the health and wellbeing of our residents and communities, and to take action on the Climate Emergency and protect the environment. In Waverley, projects such as those delivered under Surrey's Local Transport Plan (LTP4), will be key to the way people travel in the future. An increase in active travel will be required to achieve commitments in relation to net zero. Additionally, where developments are located, and how sites are developed, will also be fundamental to travel patterns in the future, as well as affecting population exposure to air pollutants. This Clean Air Strategy for Waverley complements these overarching aims, but also provides a wider set of measures tackling other sources of pollution. Other measures underway include those to reduce building emissions, for example through projects to reduce greenhouse gas emissions, and education and awareness to reduce solid fuel burning, especially where it is not the primary source of heating. These local measures implemented by the borough are underpinned by work being undertaken at national and international level, such as the reductions in emissions from vehicles through increasing Euro standards and the move away from internal combustion engine vehicles. All of these measures being implemented at different levels of government have the overall aim to improve health.
- 4.3 The UK's new legal framework for protection of the natural environment, the [Environment Act 2021](#) gives the Government the power to set long-term, legally binding environmental targets. It also establishes an Office for Environmental Protection (OEP), responsible for holding the government to account and ensuring compliance with these targets. The Act requires the Government to set at least one long-term target (spanning a minimum of 15 years), supported by interim targets set in a five year cycle, in each of four identified areas: Air Quality, Biodiversity, Water and Resource Efficiency and Waste Reduction. An additional target for mean levels of PM_{2.5} is also required. The Government has recently published a draft Statutory Instrument to set two new targets for future concentrations of PM_{2.5}, but this has not yet been

approved by parliament. One target will be to achieve PM_{2.5} concentration of 10 µg/m³ by 2040. This will be accompanied by a second target to reduce overall population exposure to PM_{2.5}, which will be assessed by national government using its own measurements. Defra recognises that the nature of PM_{2.5} concentrations, which are dominated by the long-range transport of emissions, means that only coordinated national-level action can allow the targets to be achieved. As such, the targets will provide metrics against which central Government can assess its own progress. There is no expectation that individual local authorities will use them to assess compliance, or that they will be used explicitly within development-control decisions. Defra's focus for local authorities is on reducing emissions which will help to drive national-level improvements, rather than addressing PM_{2.5} concentrations in their own area. Similarly, in terms of planning decisions, it is most sensible to focus on optimising development to reduce emissions and exposure. The Act also provides a legal framework for greater collaboration with 'Air Quality Partners'. As a result, responsibility for tackling local air pollution will now be shared with public authorities identified as responsible for any sources of exceedance; all tiers of local government, neighbouring authorities, Environment Agency, National Highways etc.

WHO Guidelines

- 4.4 The World Health Organization (WHO) published a revised set of guidelines in 2021 for PM_{2.5}, PM₁₀, ozone (O₃), nitrogen dioxide (NO₂), sulphur dioxide (SO₂) and carbon monoxide (CO). They update the previous guidelines issued in 2005 and are based on a review of evidence on the effects of air pollution on health, drawn from the last 16 years and more. The guidelines are not legally binding but they "provide WHO Member States with an evidence-informed tool that they can use to inform legislation and policy". Currently, the UK Air Quality Objectives remain unchanged. WHO does not intend that Governments and policy makers simply adopt the Guidelines into legislation. However, the Environment Act 2021 requires that the Government set a new target for PM_{2.5} and that it has regard to the WHO Air Quality Guidelines while doing so. The new targets have been consulted on, but not yet adopted.

Surrey Context

Public Health

- 4.5 Local authorities have a range of powers which can effectively help to improve air quality. However, the involvement of public health officials is crucial in playing a role to assess the public health impacts and providing advice and guidance on taking appropriate action to reduce exposure and improve health. Mounting scientific evidence shows the scale of the impact of poor ambient air quality on health. Evidence suggests interventions aiming to reduce

population exposure to pollution will have the biggest overall health impact, although action also needs to be taken to reduce inequalities in exposure and to protect vulnerable groups⁴.

Local Transport Plan

- 4.6 Surrey County Council (SCC) is in the process of updating its Local Transport Plan, which sets out the changes required to achieve net zero emissions by 2050. SCC are committed to significantly transforming transport networks to meet this national target and LTP4 sets out measures to increase active travel and personal mobility, promote public and shared transport, promote zero emission vehicles and incorporate the principles of planning for place.

Waverley Context

Local Plan

- 4.7 The Local Plan Part 1: Strategic Policies and Sites (LPP1) sets out the Council's spatial framework for delivering the development and change needed to realise the vision for development in Waverley up to 2032 and is already adopted. Local Plan Part 2 (LPP2) will form the second stage of Waverley's new Local Plan. Together with LPP1 this document will replace the 2002 Local Plan. LPP2 will provide the more detailed policies, and will allocate sites needed for housing or other uses in certain areas of Waverley. Where development is located, will affect travel patterns and hence air quality, as well as directly contributing to emissions through the buildings themselves.

Air Quality Action Plan

- 4.8 The currently adopted action plan was adopted in 2008 and contained specific actions for the (then) three AQMAs. In relation to Farnham, the town centre package, as outlined in the Farnham Review Study, was supported. In relation to Godalming, work to update the existing urban traffic control (UTC) system was highlighted, in order to reduce congestion and improve air quality. Other wider measures were also included in the plan, such as the Waverley Corporate Travel Plan, behaviour change campaigns and school travel plans. The measures have been updated through the Annual Status Reporting process, which contain detailed information on measures which have been implemented or are planned. In parallel with this Clean Air Strategy, the Air Quality Action Plan is also being updated, and will cover WBC's statutory responsibilities in terms of achieving the UK air quality objectives.

Local Air Quality Management

- 4.9 WBC is currently meeting all of the national air quality objectives, but has had some exceedances of the Nitrogen Dioxide (NO₂) annual mean objective up to 2019. Waverley Borough Council is meeting the current objectives for Particulate Matter (PM₁₀ and PM_{2.5}).

⁴ Available at <https://www.gov.uk/government/publications/improving-outdoor-air-quality-and-health-review-of-interventions>

Both pollutants are potentially damaging to health at levels below the air quality objectives, and both pollutants are therefore included within this Strategy.

4.10 In order to support the local air quality management process, WBC are currently monitoring nitrogen dioxide at over 50 sites across the borough. This is mainly using diffusion tubes, which provide a monthly reading, however, there are also automatic sites for both NO₂ (one in Farnham and one in Godalming) and PM₁₀, (one in Farnham) which provide hourly readings. In 2018, an extensive review of the air quality monitoring network in the Borough was undertaken and a monitoring strategy developed to ensure monitoring locations are representative of relevant public exposure and in 'worst case' locations. The new monitoring strategy was implemented in January 2019, with a few amendments made in January 2020.

4.11 The Environment Act 2021 will result in additional targets for PM_{2.5} and a new role for local authorities, although the targets themselves are unlikely to be for local authority compliance. There is also a new requirement for local authorities without AQMAs to produce an Air Quality Strategy in order to reduce emissions of pollutants within their local areas. The prominence of PM_{2.5} is therefore likely to increase within the LAQM process, and this Strategy provides a mechanism by which WBC can demonstrate actions to reduce emissions more widely than just in the AQMAs, including those for PM_{2.5}.

4.12 Figure 3 outlines the main policy context within which this Strategy sits.



Figure 3: Summary of Relevant Policy and Wider Context of the Strategy

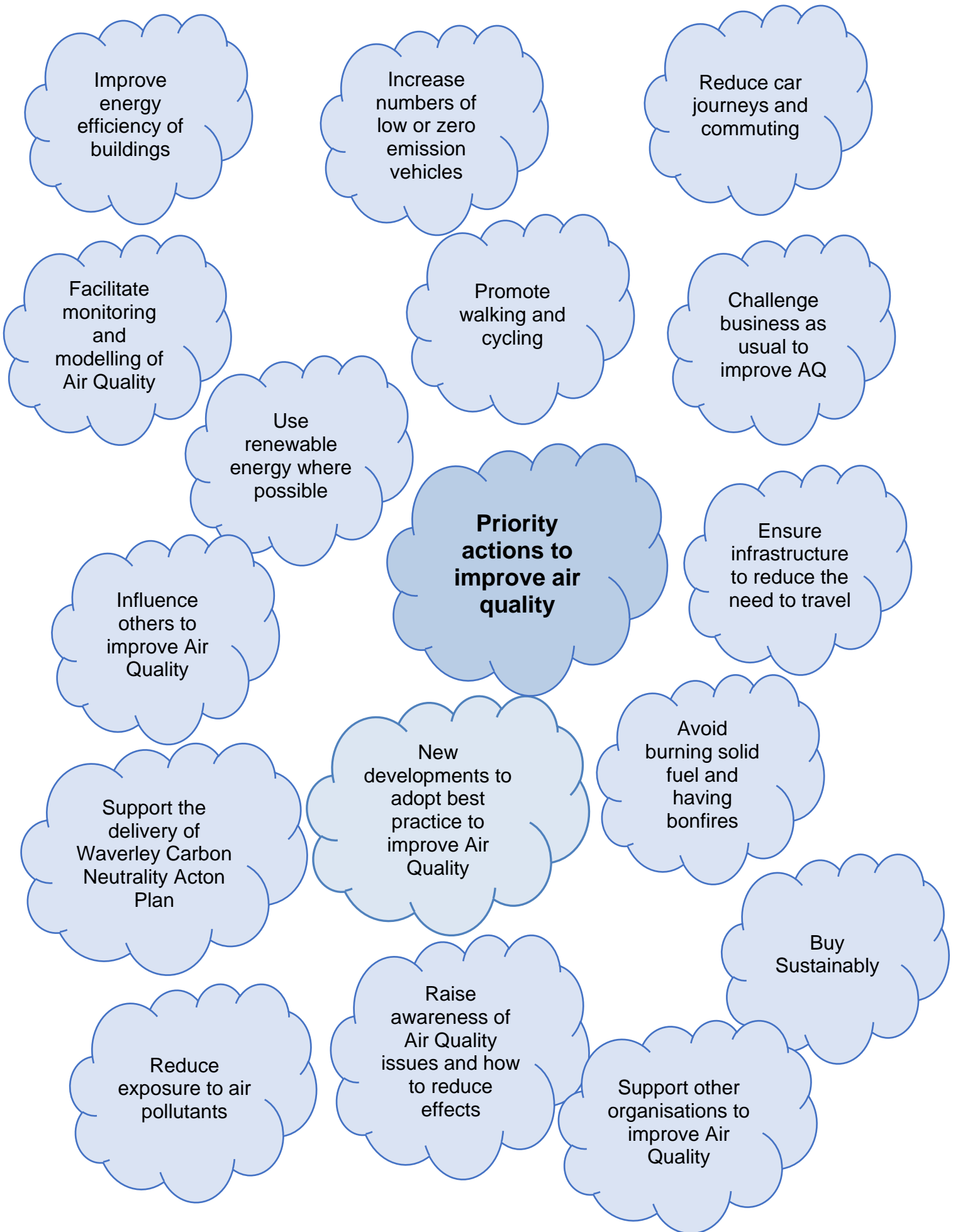
5 Actions

5.1 The strategy focuses on seven broad categories which set out the areas where actions are needed to influence an improvement in air quality within the borough:

- **Transport:** Working towards a less polluting transport network that both supports sustainable transport modes (walking, cycling, car share and public transport) and makes maximum use of existing resources through effective highways and transport planning, enabling a greener future, growing a sustainable economy, and tackling health inequality;
- **Energy:** working towards reducing energy usage and using less polluting forms of energy in order to reduce both greenhouse gas and local air pollutant emissions;
- **Public Health:** Encouragement of wider behavioural changes in the local population with respect to their travel choices, choice of energy within their homes and commercial spaces, and to raise awareness and educate members of the public on the health impact of air pollution;
- **Planning and Infrastructure:** Be involved in the planning decision making process as early as is practicable to mitigate potential air quality impacts and support environmentally sustainable development;
- **Strategies and Policy Guidance:** Working with other departments and stakeholders to direct the use of legislation and targeted enforcement to control air pollution;
- **Air Quality Evidence Base:** Use the best science practicable to collate air quality monitoring data, and wider information (for example modelling), to identify pollution hotspots, to support the decision-making process for interventions and to support wider policy across Waverley; and
- **Raise Public Awareness:** raise awareness around air quality issues including encouraging the community to take actions to reduce their contributions to local air quality emissions.

5.2 There are interconnections between these categories, for example, working towards a less polluting transport network will also require public awareness raising, and therefore priority actions and WBC's commitments are set out in Section 6, which cover all the main categories, but are structured under the main objectives of the strategy.

5.3 Priority actions are also highlighted below, and WBC encourages other organisations and the public to consider priority actions needed and what actions they can take to improve air quality. Section 7 includes a template for use by other organisations and the public to encourage dialogue, and commitment, for action on air quality.



6 Waverley Borough Council's Commitments

6.1 The following table outlines all the actions, responsibility for delivery and timescales. Importantly the key performance measure, where possible, provides a mechanism for measuring the outcome of the action. It should be noted that resource constraints within WBC and other external challenges, such as the cost of living crisis, may mean that some of these commitments may take longer to implement. Other organisations and individuals may also find actions harder to deliver, particularly in the short term.

Priority Actions	Category	WBC Commitments			
		Action	Who will deliver it?	Key Performance Measure	Timescale
Leadership in Improving Air Quality					
Reduce car journeys and commuting	Transport	L1. Reduce car journeys for commuting by Waverley staff by 60% consistent with the work done on the 'Where Work Happens' project by 2025 and promote low and zero emission transport including active transport	Organisational Development	Numbers of staff commuting. Numbers of staff using zero emission transport as reported in the Carbon Neutrality Action Plan	2025
Increase numbers of low or zero emission vehicles	Transport	L2. Develop a plan to reduce emissions from travel by converting the WBC fleet to 100% zero emissions including contractor vehicles through the procurement process	Environmental Services	Proportion of WBC Fleet being zero emission as reported in the Carbon Neutrality Action Plan	2025 onwards
Increase numbers of low or zero emission vehicles	Transport	L3 We will continue to work with taxi drivers to reduce emissions from this sector. Subject to Defra approval this will entail delivering a Defra grant funded project across Surrey to engage with taxi drivers and increase the proportions of low and zero emission taxis, supported by the taxi licensing process	Regulatory Services	Proportion of licenses for low and zero emission taxis	End of 2024
Improve energy	Energy	L4 We will reduce NOx and PM emissions from council housing	Organisational Development	Energy use in council housing building stock	Throughout the lifetime of this strategy

Priority Actions	Category	WBC Commitments			
		Action	Who will deliver it?	Key Performance Measure	Timescale
efficiency of buildings		building stock, through the Asset Management Strategy, which will present a decarbonisation path for existing council housing stock	Housing Services Commercial Services, Assets and Property	as reported in the Carbon Neutrality Action Plan	
Use renewable energy where possible	Energy	L5 We will support ongoing work within WBC regarding renewable energy generation projects and facilitating community power generation in the borough	Organisational Development	Renewable energy use within Waverley as reported in the Carbon Neutrality Action Plan	Throughout the lifetime of this strategy
Encourage new developments to adopt best practice to improve air quality across Waverley	Strategies and Policy Guidance	L6 We will support the implementation of the Climate Change and Sustainability Supplementary Planning Document, including supporting approaches to reduce energy use in new developments and encouraging sustainable forms of transport will also reduce local air pollutant emissions	Planning Development Organisational Development	Implementation of the SPD	End of 2024
Challenge business as usual for actions to improve air quality	Air Quality Evidence Base	L7 We will undertake further work to investigate the feasibility of Low Emission Zones within Waverley, and what form these could take (this is likely to entail a less formal approach than those implemented under the Clean Air Zone Framework, and may entail joint working more widely across Surrey)	Regulatory Services	Production of feasibility study into LEZs	2023-2024
Work with the council to facilitate monitoring and modelling of air quality	Air Quality Evidence Base	L8 We will continue to deliver the statutory requirements of the LAQM process, including annual reporting to Defra,	Regulatory Services	Annual submission of Annual Status Report to Defra and Air Quality Action Plan	2023 for AQAP, ongoing annual reporting

Priority Actions	Category	WBC Commitments			
		Action	Who will deliver it?	Key Performance Measure	Timescale
		and air quality monitoring and modelling to provide the evidence base for those reports. This includes an update of the Air Quality Action Plan due in 2023			
Buy sustainably	Strategies and Policy Guidance	L9 We will ensure sustainable procurement practices throughout the council as part of the Council's Procurement Strategy	Finance	Adoption of the WBC Sustainable Procurement Strategy	2023
Avoid burning solid fuel and having bonfires	Energy	L10 We will consider with partner agencies, alternative ways to manage waste produced from land management, other than burning, where possible.	Environmental Services	Reduction in numbers of council bonfires	end of 2024
Use renewable energy where possible	Energy	L11 We will not support commercial exploration or extraction of fossil fuels, which may in the future undergo combustion	Regeneration and Planning Policy		Throughout the lifetime of this strategy
Reduce exposure to air pollutants	Planning and Infrastructure	L12 We will look for appropriate opportunities to implement green infrastructure either within new developments, or more widely such as at schools.	Environmental Services Regeneration and Planning Policy	Implementation of green infrastructure	2024-2027
Work Collaboratively to improve Air Quality					
Support other organisations to improve air quality	Transport, Strategies and Policy Guidance	C1 We will work with Surrey County Council on delivering LTP4 to reduce the volume of traffic on our roads and encourage a radical transformation of transport infrastructure in favour of active transport. This will also include	Regeneration and Planning Policy	Work undertaken in support of LTP4	Throughout the lifetime of this strategy

Priority Actions	Category	WBC Commitments			
		Action	Who will deliver it?	Key Performance Measure	Timescale
		improvements to public transport, freight and delivery management an increase in low and zero emission vehicles, and park and ride facilities if appropriate,			
Support other organisations to improve air quality	Raise public awareness	C2 We will encourage collaborative working with Parish and Town Councils across Waverley to enable actions to be undertaken by residents in a coordinated way.	Regulatory Services	Measures committed to by Town and Parish Councils	Throughout the lifetime of this strategy
Promote walking and cycling	Transport	C3 We will work with SCC to deliver a Greenway network, connecting the main centres across the borough.	Organisational Development	Delivery of the Greenway network	2023-2025
Support other organisations to improve air quality	Air Quality Evidence Base	C4 We will continue to work with the Surrey Air Alliance and identify opportunities for projects to either enhance the evidence base on which decisions are made, or implement measures to improve air quality.	Regulatory Services	Air quality projects implemented across Surrey	Throughout the lifetime of this strategy
Support other organisations to improve air quality	Public Health	C5 We will work collaboratively with SCC Public Health for example undertaking information dissemination on air quality through doctors' surgeries.	Regulatory Services	Air Quality Projects delivered with Public Health	Throughout the lifetime of this strategy
Encourage new developments to adopt best practice to improve air quality across Waverley	Planning and Infrastructure	C6 We will work across WBC to ensure air quality is fully considered within planning policy, and within planning applications, to ensure that air quality is maintained, and where possible	Regulatory Services Regeneration and Planning Policy Panning Development	Planning guidance for new developments and air quality	Throughout the lifetime of this strategy

Priority Actions	Category	WBC Commitments			
		Action	Who will deliver it?	Key Performance Measure	Timescale
		improved. We will encourage best practice design measures through guidance provided to developers and will set appropriate planning conditions for mitigation where required			
Ensure that infrastructure is in place to reduce the need to travel	Planning and Infrastructure	C7 We will support extensive rollout of fibre broadband and 5G mobile coverage in order to reduce the need to travel	Regeneration and Planning Policy Assets and Property	Proportion of borough covered by 5G	2024-2027
Support the delivery of the Waverley Carbon Neutrality Action Plan	Transport, Energy, Planning and Infrastructure	C8 We will support work being undertaken on the Waverley carbon neutrality action plan, particularly in relation to active travel and energy generation	Organisational Development Regulatory Services	Regular reports to the Carbon Emergency Board	Throughout the lifetime of this strategy
Increase numbers of low or zero emission vehicles	Transport	C9 Support the installation of on street EV chargers to encourage residents and taxi drivers to switch to electric vehicles in line with the WBC Electric Vehicle Strategy.	Organisational Development Regulatory Services	Numbers of EV chargers in place	Throughout the lifetime of this strategy
Influence others to improve air quality	Strategies and Policy Guidance	C10 We will work to influence national legislation by lobbying the national Government and responding to relevant consultations on air quality	Regulatory Services	Timely responses to consultations and surveys	Throughout the lifetime of this strategy
Support and Enable Behaviour Change					
Avoid burning solid fuel and having bonfires	Raise Public Awareness	B1 We will continue to work through the Surrey Air Alliance with SCC's Trading Standards to develop a project to raise awareness about solid fuel burning air quality impacts and promoting/enforcing changes to rules in	Regulatory Services Communications and Customer Services	Implementation of a project about solid fuel burning	2024

Priority Actions	Category	WBC Commitments			
		Action	Who will deliver it?	Key Performance Measure	Timescale
		supplying/buying solid fuel			
Avoid burning solid fuel and having bonfires	Raise Public Awareness	B2 We will continue to encourage people not to have bonfires. Longer term we will investigate bylaws for bonfires	Regulatory Services Communications and Customer Services	Campaigns undertaken	Throughout the lifetime of this strategy
Raise awareness of air quality issues and how to reduce effects	Raise Public Awareness	B3 We will support events such as Clean Air Day and work to engage with local communities to raise awareness of measures they and individuals can take to reduce air pollution	Regulatory Services Communications and Customer Services	Input into Clean Air Day	Throughout the lifetime of this strategy
Promote walking and cycling	Transport	B4 We will adopt Local Cycling and Walking Infrastructure Plans for Farnham and Waverley	Organisational Development	Adoption of LCWIPs	2024-2026
Raise awareness of air quality issues and how to reduce effects	Raise Public Awareness	B5 We will provide tailored, clear, accurate and consistent messages about the benefits of good air quality, utilising the Waverley Borough Council website as a platform to inform residents	Regulatory Services Communications and Customer Services	Annual review of our air quality web pages with updates if needed	Throughout the lifetime of this strategy
Raise awareness of air quality issues and how to reduce effects	Raise Public Awareness	B6 Carbon Neutrality Action Plan is setting up a Citizens Assembly to encourage public participation in shaping the climate emergency agenda – we will investigate the feasibility of using this mechanism to raise awareness on air quality.	Organisational Development Regulatory Services Communications and Customer Services	Use of Citizens Assembly for participation	2023-2024
Raise awareness of air quality issues and how to reduce effects	Raise Public Awareness, Transport	B7 We will work with SCC to tackle vehicle idling emissions at key locations such as on Station Hill in Farnham, other level	Regulatory Services	Anti-idling signs implemented	2023-2024

Priority Actions	Category	WBC Commitments			
		Action	Who will deliver it?	Key Performance Measure	Timescale
		crossings and outside schools			
Raise awareness of air quality issues and how to reduce effects	Raise Public Awareness, Public Health	B8 Through the SAA we will continue to work with Surrey Heartlands Clinical Commissioning Group to contribute to a project looking at links between paediatric asthma and AQMAs to help inform and take forward a paediatric asthma care bundle	Regulatory Services	Implementation of asthma care bundle	2023-2024
Raise awareness of air quality issues and how to reduce effects	Raise Public Awareness, Transport	B9 We will work with SCC to support the eco-school's initiative (including promoting active travel, Mode Shift Stars, Bikeability training, walking training, and an understanding of impacts on air quality).	Regulatory Services	Number of schools signed up to the Eco-school's initiative	2023-2025
Promote walking and cycling	Transport	B10 We will work with schools to identify and remove barriers to active travel	Regulatory Services	Levels of active travel within schools which have had interventions	2024-2026

Funding

- 6.2 Reducing local air pollutant emissions is a corporate priority. However, it is recognised that there are financial constraints in implementing some of WBC's commitments outlined in this strategy. The council has developed a prioritisation methodology which covers a number of criteria including any ongoing revenue costs or savings, deliverability, the extent to which the proposed scheme meets the council's priorities and the environmental credentials of the project.
- 6.3 WBC will continually look for external sources of funding as they become available to supplement the costs of actions outlined in this strategy. This includes, but is not limited to, the Defra Air Quality Grant, which is an annual programme to award grants to local authorities, largely to improve air quality within their areas, or undertake work which may improve the evidence base on which actions are based. Some projects may be implemented

collaboratively, for example with Surrey County Council, or across local authorities within Surrey (through the Surrey Air Alliance). The Defra Air Quality Grant programme allows for joint bids to be submitted, which SAA have already been successful in being awarded funding.

- 6.4 It is also possible to utilise contributions from developers to ensure that development does not worsen air quality, and where possible contributes to positive improvements. The carbon neutrality action plan commits to looking for ways to utilise the Community Infrastructure Levy (CIL) for actions to reduce climate change gas emissions, many of which will assist in reducing local pollutants.

Governance

- 6.5 Waverley Air Quality Steering Group and Farnham Air Quality Working Group were established in 2017 to discuss air quality issues in the Borough and ensure actions to improve air quality are considered. The Air Quality Steering Group now reports to the Climate Emergency Board, and the progress of this Strategy will be incorporated into this reporting process.
- 6.6 WBC continue to take steps towards implementing small measures at every available opportunity and have developed joint working groups with other colleagues both externally through the Waverley Air Quality Steering Group, Farnham Infrastructure Board, Surrey Air Alliance, and internally within WBC. The Farnham Infrastructure Board led by SCC and local stakeholders, including WBC, looks to deliver a sustainable infrastructure programme for Farnham, including transport infrastructure.
- 6.7 Officers will continue to work within the Surrey Air Alliance to ensure consistent and collaborative working across Surrey. It is recognised that there are potential sources outside of WBC's area, such as Farnborough Airport, and WBC will continue to work with neighbouring authorities on issues which will be of relevance to air quality.
- 6.8 Annual progress will be reported in the ASR to be submitted to Defra. The Strategy will be reviewed every 5 years and updated as appropriate.
- 6.9 A communications plan will be adopted as part of the strategy to ensure that the aspects of information dissemination and behaviour change are undertaken effectively over time. This will include messaging around a range of issues, including anti idling, solid fuel burning and wider messaging around health effects.

7 Template for Adoption of Actions by Others

7.1 The following table outlines the priority actions of the strategy and provides a template which could be used by organisations, or individuals, to adopt specific actions of their own. Not all priority actions will be relevant for all organisations. Examples of actions which could be taken are included within WBC's commitments in Section 6.

Priority Action		Commitments
1	Reduce car journeys and commuting	
2	Increase numbers of low or zero emission vehicles	
3	Improve energy efficiency of buildings	
4	Use renewable energy where possible	
5	Challenge business as usual for actions to improve air quality	
6	Work with the council to facilitate monitoring and modelling of air quality	
7	Buy sustainably	
8	Avoid burning solid fuel and having bonfires	
9	Reduce exposure to air pollutants	
10	Support other organisations to improve air quality	
11	Promote walking and cycling	
12	Encourage new developments to adopt best practice to improve air quality across Waverley	
13	Ensure that infrastructure is in place to reduce the need to travel	
14	Support the delivery of the Waverley Carbon Neutrality Action Plan	
15	Influence others to improve air quality	
16	Raise awareness of air quality issues and how to reduce effects	

Glossary of Terms

Abbreviation	Description
AQAP	Air Quality Action Plan - A detailed description of measures, outcomes, achievement dates and implementation methods, showing how the local authority intends to achieve air quality limit values'
AQC	Air Quality Consultants
AQMA	Air Quality Management Area – An area where air pollutant concentrations exceed / are likely to exceed the relevant air quality objectives. AQMAs are declared for specific pollutants and objectives
AQS	Air Quality Strategy
ASR	Air quality Annual Status Report
CAS	Clean Air Strategy
CERC	Cambridge Environmental Research Consultants
COMEAP	Committee On the Medical Effects of Air Pollution
Defra	Department for Environment, Food and Rural Affairs
EU	European Union
EV	Electric Vehicle
HGV	Heavy Goods Vehicle
HWS	Health and Wellbeing Strategy

Waverley Borough Council

JSNA	Joint Strategic Needs Assessment
LAQM	Local Air Quality Management
LCWIP	Local Cycling and Walking Infrastructure Plan
LGV	Light Goods Vehicle
MP	Member of Parliament
NHS	National Health Service
NO ₂	Nitrogen Dioxide
NO _x	Nitrogen Oxides
PHOF	Public Health Outcomes Framework
PM ₁₀	Airborne particulate matter with an aerodynamic diameter of 10µm (micrometres or microns) or less
PM _{2.5}	Airborne particulate matter with an aerodynamic diameter of 2.5µm or less
SCC	Surrey County Council
UTC	Urban Traffic Control
WBC	Waverley Borough Council

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WAVERLEY BOROUGH COUNCIL

EXECUTIVE

7 MARCH 2023

Title:

Community Infrastructure Levy (CIL) Bidding Cycle 2022/2023

Portfolio Holder: Cllr Nick Palmer, Portfolio Holder for Housing (Delivery)

Head of Service: Abi Lewis, Executive Head of Regeneration and Planning Policy

Key decision: Yes

Access: Public

1. Purpose and summary

- 1.1 As per the approved CIL governance arrangements, the Executive is delegated to approve bids for the allocation of Strategic CIL Funding, on the recommendation of the CIL Advisory Board, subject to an upper limit of £2.5m per individual award, above which approval reverts to Full Council.
- 1.2 This report seeks approval from the Executive for the allocation of Strategic CIL funding to the projects recommended for funding by the CIL Advisory Board in relation to the Strategic CIL Bidding Cycle 2022/23.

2. Recommendation

- 1) It is recommended that the Executive agree the recommendations of the CIL Advisory Board and approve the allocation of Strategic CIL funding to the projects as set out in this report. This is subject to the completion of the final relevant checks and the signing of funding agreements, the details of which are delegated to the Strategic Director in consultation with the Portfolio Holder for Housing (Delivery).
- 2) It is recommended that the Executive agree the recommendation of the CIL Advisory Board to remove the 'Community CIL' from future Strategic CIL Bidding Cycles, for the reasons as set out within this report.

3. Reason for the recommendation

In order to ensure robust and effective expenditure, in line with the CIL Regulations 2010 (as amended), and in accordance with the Council's approved CIL governance arrangements which include detailed eligibility and assessment criteria.

4. Background

- 4.1 In accordance with the CIL Regulations 2010 (as amended), Strategic CIL must be spent on “the provision, improvement, replacement, operation or maintenance of infrastructure to support the development of its area”
- 4.2 ‘Infrastructure’ is defined within the Planning Act 2008. It includes: roads and other transport facilities, flood defences, schools and other educational facilities, medical facilities, sporting and recreational facilities, and open spaces.
- 4.3 CIL should not be used to remedy pre-existing deficiencies in infrastructure provision, unless those deficiencies will be made more severe by new development.
- 4.4 The Council has approved the CIL governance arrangements to allow for an annual bidding cycle for the allocation of Strategic CIL receipts to enable the delivery of specific infrastructure projects that will support development in the Borough. This approval also included the use of a scoring criteria for evaluating bids for infrastructure from the Strategic CIL Fund. These governance arrangements were considered by Overview and Scrutiny prior to approval. Under delegated powers, the CIL Advisory Board made minor amendments to the Scoring Criteria, to reflect updated circumstances, and this was used for the 2022/23 CIL Bidding Cycle.
- 4.5 Infrastructure providers were invited to submit bids to the 2022/23 Strategic CIL Bidding Cycle between the 1st of July 2022 and the 14th of October 2022.
- 4.6 In accordance with the agreed CIL governance arrangements, the Executive is delegated to approve bids for the allocation of Strategic CIL Funding, on the recommendation of the CIL Advisory Board, subject to an upper limit of £2.5m per individual award, above which approval reverts to Full Council.

Available Strategic CIL

- 4.7 As of 1st January 2023, the amount of Strategic CIL available was **£4,455,275.14**.
- 4.8 In accordance with the CIL Regulations 2010 (as amended), the Council agreed that it will only award Strategic CIL up to the value of actual amounts received. CIL receipts whereby a Demand Notice has been raised but the amount is yet to be received will be subject to allocation at future bidding rounds.
- 4.9 It is not necessary for the Council to allocate all the Strategic CIL funds available each bidding round, if submitted bids are not deemed high priority, the CIL shall not be allocated and will be reserved for the next bidding cycle.

‘Community CIL’

- 4.10 The Council agreed the detailed governance arrangements for the expenditure of Strategic CIL, prior to the implementation of CIL in March 2019. As part of such, it was decided that the Strategic CIL should be ‘bottom-sliced’ to create a ‘Community CIL’ fund of 10% of the Strategic CIL receipts available within each CIL bidding cycle. The fund was defined as for funding low-value but desirable community infrastructure projects on application from parish councils, with priority being given to bids from parish councils with relatively low Neighbourhood CIL Fund receipts.

The creation of a 'Community CIL' fund was made by this Council, rather than prescribed or recommended by the CIL Regulations 2010 (as amended).

- 4.11 In line with the Regulations, 15% of CIL receipts (capped at £100 per Council tax dwelling per annum in the parish area) or 25% where there is a 'made' Neighbourhood Plan are transferred to the relevant Town and Parish Councils twice a year, where development has occurred in their area.
- 4.12 Since the implementation of CIL, as demonstrated within Appendix 1, many of the Town and Parish Councils have received, or are due, substantial amounts of Neighbourhood CIL. These Neighbourhood CIL monies can be used by the Town/Parish Council to fund infrastructure projects or anything else that is concerned with addressing the demands that development places on the area.
- 4.13 Consequently, since the implementation of CIL it has been found that the need for a 'Community CIL' fund is effectively superseded by the role of Neighbourhood CIL. The 'Community CIL' fund requires that the bidding parish has low Neighbourhood CIL Fund receipts. However, the parishes shown within Appendix 1 with low Neighbourhood CIL Fund receipts have not received significant development within the CIL regime, hence infrastructure projects located in such areas are unlikely to meet the requirement of Strategic CIL expenditure.
- 4.14 The CIL Advisory Board therefore recommends that the bottom-sliced 'Community CIL' fund is removed for future Strategic CIL bidding cycles and the Strategic CIL is treated as a whole. This approach would allow for Strategic CIL funds to be available for 'strategic' infrastructure projects, whilst Neighbourhood CIL is utilised for projects with more localised impacts. It should be noted that the removal of the 'Community CIL' fund would not prevent community infrastructure projects from submitting a Strategic CIL bid.

2022/2023 CIL Bid Cycle

- 4.15 The 2022/23 CIL Bidding Cycle received 24 bid submissions.
- 4.16 The total value of the projects submitted was just over £24 million and the total CIL requested was just over £9 million. These values represent figures significantly higher than previous Strategic CIL bidding cycles.
- 4.17 As per the previous bidding cycle, Officers noted that the quality and detail provided within the submitted bids varied greatly. Some submissions only included the application form, whilst others were accompanied by substantial amounts of supporting evidence and associated documentation.

Invalid CIL Bids

- 4.18 As per the agreed governance arrangements, for a CIL bid to be valid it must meet the mandatory criteria specified in the agreed CIL Bid Scoring Criteria. Three of the submitted bids have been assessed as invalid; these submissions failed to meet the mandatory requirements for the following reasons:

Applicant	Project	Reason
Hindhead Playing Fields Association	Repair and refurbishment of the sports pavilion at Hindhead Playing Field	Project will not support development/ Project aims to remedy a pre-existing deficiency which will not be made more severe by new development
Jigsaw Trust	Installation of Heating, ventilation, and air conditioning (HVAC) to classrooms at Jigsaw School	Project aims to remedy a pre-existing deficiency which will not be made more severe by new development
Badshot Lea Tennis Club	Landscaping works to area surrounding the newly refurbished clubhouse at Badshot Lea Tennis Club	Project will not support development/ Project aims to remedy a pre-existing deficiency which will not be made more severe by new development

CIL Advisory Board

- 4.19 In total there were 21 valid CIL bid submissions. The total value of the valid projects submitted was just over £23.9 million and the total CIL requested was just over £8.9 million.
- 4.20 All valid bids were scored using the agreed CIL Scoring Criteria. Three officers independently scored all the valid bids, following which an average score was taken for each criterion. This scoring matrix was presented to the CIL Advisory Board, which helped to inform recommendations.
- 4.21 The CIL Advisory Board met at three meetings, on the 16th, 18th and 30th January 2023 to discuss the merits of each of the valid bid. Alongside taking into account the scoring, the Members of the CIL Advisory Board discussed and considered the bids against the available Strategic and Neighbourhood CIL, and the potential strategic impact of each project. For some projects, the CIL Advisory Board invited the bid applicants to attend the final meeting to answer specific outstanding questions.
- 4.22 As a result of the three meetings, the CIL Advisory Board unanimously agreed to recommend to the Executive that the six projects detailed within the next section of this report are allocated Strategic CIL funding.

Recommendations of the CIL Advisory Board

- 4.23 As previously referenced, as of 1st January 2023, the value of the Strategic CIL is **£4,455,275.14**.
- 4.24 Following detailed consideration, the CIL Advisory Board recommended that the following bids are allocated Strategic CIL funding:

Applicant	Project	Recommended CIL Allocation
Surrey County Council	Cranleigh High Street Highway and Public Realm Improvements	£1,000,000.00
Surrey County Council	Guildford to Godalming Greenway	£483,000.00
Surrey County Council	Cranleigh Active Travel Corridor	£558,000.00
Waverley Hoppa Community Transport	Bid 2: Addition of two new electric buses to Hoppa's fleet of accessible minibuses	£112,810.00
Surrey County Council	Improvements to B3208 Water Lane Roundabout , Farnham	£404,894.00
Waverley Borough Council and NHS Frimley Integrated Care Board	New medical practice at Wey Court East, Farnham	£754,920.00*
Total		£3,313,624.00

** The CIL Advisory Board recommend that the award of funding to this project is subject to a resolution to grant planning permission being achieved within 6 months of any Executive decision to award funding.*

- 4.25 CIL cannot be used to retrospectively fund infrastructure and therefore if the bid is allocated funding, it may be that when terms and conditions are agreed that the amount of CIL funding is reduced to ensure compliance with the CIL Regulations.
- 4.26 For projects approved for funding, to ensure that CIL expenditure remains in accordance with the CIL Regulations all applicants will be required to accept the terms and conditions and sign a funding agreement. Where relevant, the CIL funding will also be conditional upon the applicant obtaining any necessary building regulations and/or planning permission and any other consents or permissions that may be required. Funding agreements may specify that a project is expected to be delivered within a specific timescale. Payments will be made to successful submissions after completion of the project (or agreed major stages if appropriate) to the satisfaction of the Council and after submission of verifiable invoices, as proof of expenditure. Following the completion of the project, any unspent allocated monies (e.g. unspent contingency funds) will be returned to the Strategic CIL fund.
- 4.27 The Council has an obligation to report on how CIL funding is used in its Infrastructure Funding Statement (IFS) which is published annually in December.

Bids not recommended for funding

- 4.28 Following the assessment of the valid bids by the CIL Advisory Board, the following projects are not recommended for the allocation of CIL funding:

Applicant	Project	CIL Requested	Reason for not recommending funding
Waverley Hoppa Community Transport	Bid 1: Addition of one new electric bus to Hoppa's fleet of accessible minibuses	£56,405.00	The applicant submitted two options for this project. The Board has recommended that 'Bid 2' be allocated Strategic CIL funding. Consequently, 'Bid 1' is not recommended for funding.
Partners at Binscombe Medical Centre	Extension, alterations and improvements to Binscombe Medical Centre	£604,000.00	<p>The project scored well across the CIL Scoring Criteria, however, there was concern about the deliverability of the project given that planning permission has yet to be sought. The applicant reported subsequent to the submission of the CIL bid that rescoping of the project may be necessary for a number of factors.</p> <p>The Board concluded that this bid for Strategic CIL is premature.</p>
Sussex and Surrey Police	Electric mobile engagement policing vehicle	£53,963.88	It is noted this bid responded to feedback given when this project was submitted in the 2021/22 Strategic CIL Bidding Cycle. However, the Board were unable see sufficient benefit of CIL funds being invested in this project.
Surrey Heartlands Integrated Care Board	Same Day Access Healthcare Hub based at Haslemere Hospital	£1.2 million (application in Oct 22), revised to £1.9- £2.4 million (Jan 2023)	The project scored relatively well across the CIL Scoring Criteria, the exception is 'Project Cost' as the request is for the entire project to be funded by CIL. It was noted that all alternative funding sources had not been explored. The applicant reported, subsequent to the submission of the CIL bid, that the project costs had been significantly revised. The Board expressed concern about how this may impact deliverability. There was also concern about the deliverability

Applicant	Project	CIL Requested	Reason for not recommending funding
			<p>of the project given that planning permission may be required and has yet to be sought.</p> <p>The Board concluded that this bid for Strategic CIL is premature.</p>
Alfold Football Club	4G Pitch at Alfold Recreational Ground	£846,762.63	<p>The project scored relatively well across the CIL Scoring Criteria, the exception is 'Project Cost' as the request is for over 95% of the project to be funded by CIL. The Board also queried whether alternative funding sources (e.g. Neighbourhood CIL, Football Foundation) could be explored or be available in the future.</p> <p>There was also concern about the deliverability of the project given that planning permission has yet to be sought.</p> <p>The Board concluded that this bid for Strategic CIL is premature.</p>
Busbridge CofE Junior School	Installation of Multi-Use Games Area (MUGA)	£60,000.00	<p>The submitted bid scores moderately well across the CIL Scoring Criteria, but poorly in relation to 'Delivering Growth'. There was also concern about the deliverability of the project given that planning permission has yet to be determined. It is considered that this project would have a limited strategic impact in supporting Development, therefore it is considered that this project would be more suitable for Neighbourhood CIL expenditure. It is noted that Godalming Town Council has committed to supporting the project using Neighbourhood CIL.</p>

Applicant	Project	CIL Requested	Reason for not recommending funding
Hambledon Football Club	Creation of one adult pitch and 2 youth 5v5 pitches at Badger Park, Hambledon	£175,000.00	<p>The submitted bid scores moderately well across the CIL Scoring Criteria, but relatively poorly in relation to 'Delivering Growth'. The Board also queried whether alternative funding sources (e.g. Neighbourhood CIL, Football Foundation) could be explored or be available in the future.</p> <p>There was also concern about the deliverability of the project given landownership arrangements and as planning permission had yet to be sought and will be required.</p> <p>The Board concluded that this bid for Strategic CIL is premature.</p>
South Western Railway	Installation of Wall Mounted Touch Screen Information Totems at stations in Waverley	£130,000.00	<p>The submitted bid scores moderately across the CIL Scoring Criteria, but relatively poorly in relation to 'Delivering Growth' and 'Project Costs'. The project also offers no match funding.</p>
Cranleigh Arts Centre	Refurbishment & Improvements to Cranleigh Arts Centre	£457,556.00	<p>The submitted bid scores moderately across the CIL Scoring Criteria, but relatively poorly in relation to 'Community Support' and 'Project Costs'. The Board expressed concern about the links of some of the aspects of this project supporting development and considered aspects of the project sought to remedy a pre-existing deficiency in infrastructure provision which will not be made more severe by new development.</p>
Farnham Rugby Union Football Club	4G Pitch at Farnham Rugby Union Football Club	£300,000.00	<p>In the 2021/22 Strategic CIL Bidding Cycle the Council allocated the Strategic CIL Funding for a 3G pitch within</p>

Applicant	Project	CIL Requested	Reason for not recommending funding
			<p>the same area. The Playing Pitch Strategy sets out that there is only a requirement for one additional 3G pitch in this geographical area; this requirement will be satisfied by the 3G pitch at Farnham Heath School. It is noted this bid has responded to feedback given when this project was submitted in the 2021/22 Strategic CIL Bidding Cycle. However, as a result of such 'need' for the infrastructure being addressed, this project scores relatively poorly across the CIL Scoring Criteria.</p>
Jigsaw Trust	Playground Scooter Track	£29,626.32	<p>The submitted bid scores poorly against a number of the CIL Scoring Criteria; including in relation to 'Delivering Growth', 'Community Support' and 'Project Costs'. The request is for 95% of the project to be funded by CIL. Given the scale and nature of the project, it is considered that this project would be more suitable for Neighbourhood CIL expenditure.</p>
Friends of Broadwater School on behalf of Broadwater School	Recreational gardens at Broadwater School	£89,400.00	<p>The submitted bid scores poorly against a number of the CIL Scoring Criteria; including 'Delivering Growth' and 'Project Costs'. It is considered that this project would have a limited strategic impact in supporting development and therefore, it is considered that this project would be more suitable for Neighbourhood CIL expenditure. It is noted that Godalming Town Council has committed to supporting the project using Neighbourhood CIL.</p>

Applicant	Project	CIL Requested	Reason for not recommending funding
Farnham Maltings	Installation of external solar canopy	£311,335.00	The submitted bid scores poorly against a number of the CIL Scoring Criteria; including 'Delivering Growth', 'Project Costs', and 'Community Support' (related this specific project rather than the Maltings more generally).
Dene Lane (Upper) and Cricket Lane Association	Dene Lane and Cricket Lane resurfacing works	£16,082.64	The submitted bid scores poorly across the majority of the CIL Scoring Criteria. The Board expressed concern about the link to this project supporting development and considered it sought to remedy a pre-existing deficiency in infrastructure provision which will not be made more severe by new development. The Board also queried whether CIL would be a correct funding mechanism for this project, frontagers are responsible for maintenance and repairs of an unadopted road.
Cranleigh Arts Centre	Expanded theatre seating at Cranleigh Arts Centre	£1,316,338.00	The submitted bid lacks detail and as a result scores very poorly against all the CIL Scoring Criteria. The project also offers no match funding.

Next Steps

- 4.29 If the Executive approves some or all the recommended projects, officers will then work with the bidders to formally confirm the CIL funding arrangements, including any terms and conditions.
- 4.30 The CIL Advisory Board will meet next month to reflect upon the 2022/23 Strategic CIL bidding round; review the process (if found necessary); and finalise the dates for the next Strategic CIL bidding round (2023/2024).

5. Relationship to the Corporate Strategy and Service Plan

- 5.1 The CIL helps to deliver infrastructure across all the priority themes and ambitions set out in the Corporate Strategy. This report supports the Corporate Strategy and Service Plan by ensuring that the Community Infrastructure Levy is spent fairly

and transparently and delivers the strategic and local community infrastructure necessary to support growth.

6. Implications of decision

6.1 Resource (Finance, procurement, staffing, IT)

The CIL amounts proposed for allocation have been received and there is no impact on Waverley's budget as a result of the proposals in this report.

6.2 Risk management

The Council will ensure it spends CIL correctly in accordance with the CIL Regulations by completing final relevant checks on all bids allocated funding and ensuring that funding agreements address all relevant matters.

6.3 Legal

Money raised through CIL can only be spent on supporting development by funding the provision, improvement, replacement, operation, or maintenance of infrastructure. The definition of infrastructure in section 216(2) of the PA 2008 is sufficiently wide to give the Council flexibility to choose what infrastructure it needs to deliver. Legal services will support the Council in order to ensure ongoing compliance with the Regulations.

Legal services will also support the process of preparing and agreeing funding agreements with third parties to ensure that funding is properly administered and safeguarded.

6.4 Equality, diversity, and inclusion

The signed funding agreements will ensure that matters of equality, diversity and inclusion are addressed for each infrastructure project.

6.5 Climate emergency declaration

The CIL Scoring Criteria included a component of assessing how the bid supported the aims and targets of the Council's Climate Emergency. Many of the recommended bids will have significant positive impacts on the environment including the support of sustainable forms of transport, improved pedestrian and cycle routes, open space improvements and investment in social infrastructure to enable health and well-being of its residents.

7. Consultation and engagement

7.1 Officers have engaged with infrastructure providers throughout this process.

8. Other options considered

8.1 The CIL Advisory Board have given thorough consideration to each successful and unsuccessful bid throughout this process.

9. Governance journey

- 9.1 The Executive is delegated to approve bids for allocation of Strategic CIL Funding, on the recommendation of the CIL Advisory Board is subject to an upper limit of £2.5m per individual award. The Council approved its outline CIL Governance arrangements on 11 December 2018 and the detailed criteria and financial thresholds were considered by Value for Money O&S Committee on 18 February 2019 and approved by Council 19 March 2019.
-

Background Papers

There are no background papers, as defined by Section 100D(5) of the Local Government Act 1972).

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Agreed and signed off by:

Legal Services: 16/02/23

Head of Finance: 16/02/23

Strategic Director: 14/02/23

Portfolio Holder: 15/02/23

Appendix 1: Neighbourhood CIL

Parish	Neighbourhood CIL due *	Neighbourhood CIL collected *	Total *	Neighbourhood CIL potential **
Alfold	£0.00	£74,070.82	£74,070.82	£226,196.97
Bramley	£0.00	£13,623.30	£13,623.30	£44,867.72
Busbridge	£0.00	£39,209.28	£39,209.28	£9,478.44
Chiddingfold	£3.29	£3,809.92	£3,813.21	£200,072.43
Churt	£8.15	£0.00	£8.15	£29,782.29
Cranleigh	£37,229.62	£66,536.53	£103,766.15	£124,563.34
Dockenfield	£1,358.19	£23,716.65	£25,074.84	£23,225.70
Dunsfold	£1,054.47	£0.00	£1,054.47	£120,230.32
Elstead	£8,550.54	£0.00	£8,550.54	£10,297.46
Ewhurst	£8,288.22	£102,537.47	£110,825.69	£392,475.76
Farnham	£57,139.60	£380,482.68	£437,622.28	£1,941,309.29
Frensham	£0.84	£1,308.86	£1,309.70	£135,481.67
Godalming	£267,618.25	£274,348.88	£541,967.13	£465,756.52
Hambledon	£0.00	£53,343.23	£53,343.23	£26,112.31
Hascombe	£0.00	£0.00	£0.00	£15,270.98
Haslemere	£39,013.94	172,228.30	£211,242.24	£1,750,083.84
Peper Harow	£0.00	£0.00	£0.00	£943.55
Thursley	£0.00	£2,589.24	£2,589.24	£11,620.26
Tilford	£0.00	£1,670.79	£1,670.79	£45,898.16
Witley	£14,839.40	£147,860.77	£162,700.17	£277,518.59
Wonersh	£0.00	£19,747.00	£19,747.00	£31,932.25

* As of 1 January 2023

** As of 1 January 2023; note figures may be subject to change due to granted applications requiring processing by the CIL Team

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WAVERLEY BOROUGH COUNCIL

EXECUTIVE

7 MARCH 2023

Title:

REQUEST FOR SUPPLEMENTARY ESTIMATE – DEVELOPMENT MANAGEMENT

Portfolio Holder: Cllr Liz Townsend

Head of Service: Gilian Macinnes, Executive Head of Planning Development

Key decision: No

Access: Part exempt

Note pursuant to Section 100B(5) of the Local Government Act 1972

Annexe 1 to this report contains exempt information by virtue of which the public is likely to be excluded during the item to which the report relates, as specified in Paragraph 3 of Part I of Schedule 12A to the Local Government Act 1972, namely:

Information relating to the financial or business affairs of any particular person (including the authority holding that information).

1. Purpose and summary

- 1.1 The purpose of this report is to seek approval for a supplementary estimate to cover the costs associated with various pending and upcoming appeals and to further fund legislation required advertising costs. The report sets out that the Service does not have sufficient budget to meet the costs being claimed.

2. Recommendation

- 2.1 It is recommended that the Executive approves a supplementary estimate totalling £97,990 for the following costs:
- £15,000 for planning application advertising fee overspend (statutory requirement) and
 - £82,990 for pending and forthcoming appeals costs.

3. Reason for the recommendation

- 3.1 Whilst the Planning Service budget includes sums for legal expenses, it does not have sufficient funds to meet the costs as shown above. It is therefore necessary to seek a supplementary estimate to pay the above amounts suggested.

4. Relationship to the Corporate Strategy and Service Plan

4.1 The Corporate Strategy supports place shaping and local engagement in planning policy. The Service Plan refers to determining planning applications in accordance with the Development Plan. In refusing planning permission for the development, the Council considered that it was acting in accordance with these points.

5. Implications of decision

5.1 Resource (Finance, procurement, staffing, IT)

The additional cost will be funded partly by a release of a planning reserve that is no longer required, this is £62,800 and £35,190 from general fund savings.

5.2 Risk management

No issues identified

5.3 Legal

The legal implications are set out in the report.

5.4 Equality, diversity and inclusion

There are no direct equality, diversity or inclusion implications in this report. Equality impact assessments are carried out when necessary across the council to ensure service delivery meets the requirements of the Public Sector Equality Duty under the Equality Act 2010.

5.5 Climate emergency declaration

There are no relevant issues arising from this report.

6. Consultation and engagement

6.1 There are no comments from committees or other consultees.

7. Other options considered

7.1 The officers have not identified any other options for dealing with this matter.

8. Governance journey

8.1 This decision will be made by the Executive.

Background Papers

There are no background papers, as defined by Section 100D(5) of the Local Government Act 1972).

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Agreed and signed off by:

Legal Services: date
Head of Finance: date
Strategic Director: date
Portfolio Holder: date

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By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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WAVERLEY BOROUGH COUNCIL

EXECUTIVE

7 MARCH 2023

Title:

Cranleigh Leisure Centre new build tender

Portfolio Holder: Cllr Liz Townsend, Planning and Economic Development

Head of Service: Kelvin Mills, Executive Head of Commercial Services

Key decision: Yes

Access: Public

1. Purpose and summary

- 1.1 This report provides an update on the current position of the Cranleigh Leisure Centre new build project and presents recommendations for approval to award contracts for the design team (as specified in 3.6) following completion of the procurement process.

2. Recommendations

It is recommended the Executive:

1. Approve the award of contracts to the design team and other professional services required to reach RIBA stage 5, following completion of the procurement processes; and
2. Delegate authority to the Strategic Director for Transformation & Governance to complete all required contractual documentation and approve execution of the contract documentation.

3. Reason for the recommendation

Project background

- 3.1 Following Council commitment to a multi-million-pound investment in leisure facilities in Cranleigh, the Sport, Leisure and Culture Consultancy ('SLC') were appointed to conduct an Options Appraisal to explore the alternative site options for development of a new leisure facility for Cranleigh.
- 3.2 In March 2020 the Council put all corporate projects on hold due to the Covid-19 pandemic.

- 3.3 In September 2021 a Feasibility Update Report was undertaken by SLC to test conclusions from the earlier, pre-pandemic Options Appraisal.
- 3.4 At full Council on 14 December 2021, it was approved:
- that a capital budget of £19.95m be allocated to deliver a low carbon new-build Cranleigh Leisure Centre, to a minimum of Passivhaus standard;
 - that officers appoint a project manager and specialist energy consultant as part of the professional technical services team, to be supported by an in-house client team and to approve an associated budget of £250,000;
 - to approve a new-build leisure centre on Village Way car park, subject to planning, (Option 1, to the north of the existing centre) as the preferred location, as set out within Annexe 1 of the report; and
 - to ask officers to report back to members when final costs, design, preferred contractor, and precise funding arrangements are known.
- 3.5 A Project Working Group (PWG) was duly formed to deliver a new leisure facility for Cranleigh that will meet the demands of the local community, in terms of facility mix, but also deliver a low carbon building in accordance with Waverley's net zero carbon by 2030 commitment.
- 3.6 The PWG have worked on drafting a lead designer (Architect) brief who will act as Project Manager/Lead Consultant to RIBA stage 4. This role will manage the design team comprising of, but not limited to;
- a. Energy consultant
 - b. Cost consultant
 - c. Quantity Surveyor
 - d. M&E consultant

Leisure Management Contract specification

- 3.7 The PWG have made excellent progress and are on programme to deliver the new Leisure Management Contract (LMC) and associated specification, which includes the Cranleigh Leisure Centre new build as an integral part of the business plan investment strategy.
- 3.8 The new Contract commences in July 2023. The tender is currently out to the market with revised returns due in early February. The programme for the new build project is therefore inextricably linked and informed by the LMC process.
- 3.9 The successful leisure operator will manage the current leisure centre and play a critical role in the detailed development of the new leisure centre design and specification from July 2023.

4.0 Relationship to the Corporate Strategy and Service Plan

- 4.1 The Leisure Management Contract directly links with Waverley's Corporate Strategy 2020-25 and our strategic priorities:
- Supporting a strong, resilient local economy
 - Taking action on Climate Emergency and protecting the environment
 - Effective strategic planning and development management to meet the needs of our communities
 - Improving the health and wellbeing of our residents and communities
- 4.2 The provision of quality leisure facilities will directly facilitate the Council's vision to promote:
- high quality public services accessible for all
 - a financially sound Waverley, with infrastructure and resilient services fit for the future
 - a strong, resilient local economy, supporting local businesses and employment
 - effective strategic planning and development management which supports the planning and infrastructure needs of local communities
 - a sense of responsibility by all for our environment, promoting biodiversity, championing the green economy and protecting our planet
 - the health and wellbeing of our communities.
- 4.3 Future investment in leisure facilities is based on a robust feasibility assessment that offers value for money to the Council. External funding and developer contributions will be sought to support funding of any capital cost.

5. Implications of decision(s)

- 5.1 **Resource (Finance, procurement, staffing, IT)**
Budget for the design team and other professional services required to reach, and include, RIBA stage 4 has been provided within the project budget. The total approved budget provided for professional costs related to the project is circa £2.5m. This budget is included in the project costs of £19.95m and the £250,000 identified in paragraph 3.4 above.
- 5.2 **Risk management**
A comprehensive Risk Log is in place, which is monitored by the PWG and CLC new build Project Board.
- 5.3 **Legal**
The current leisure management contract expires on 30 June 2023, with no provision or ability to further extend. The procurement process will comply with UK procurement legislation and the Council's procurement procedure rules. External solicitors are assisting with the procurement.
- 5.4 **Equality, diversity and inclusion**
There are no Equality and Diversity implications associated to the matters raised in this report.
- 5.5 **Climate emergency declaration**

A new build leisure centre is the opportunity to make a significant contribution to the council's commitment to become zero carbon by 2030. Cranleigh Leisure Centre accounts for 11% of the council's greenhouse gas emissions therefore the impact of a Passivhaus/low carbon building could be significant, potentially reducing the carbon emission and energy cost of the new build by 60%-70%.

6. Consultation and engagement

- 6.1 Project Board have approved the Architect brief, which was shared with Well North Enterprises as part of the potential wider master planning project in collaboration with Surrey Heartlands Integrated Care Systems.
- 6.2 Key stakeholders will continue to be involved at all relevant stages of the project moving forwards.

7. Other options considered

- 7.1 All options considered have been incorporated into the report above.

8. Governance journey

- 8.1 Formal Executive approval is being sought in advance of the tender outcome being known, so as to not delay the Contract award.

Annexes

There are no annexes.

Background Papers

There are background papers, as defined by Section 100D(5) of the Local Government Act 1972).

- 1. Executive report, dated 30 November 2021, Title: Cranleigh Leisure Centre Investment
 - 2. Cranleigh Leisure Centre Building Survey - Condition Appraisal (July 2022)
 - 3. The Sport, Leisure and Culture Consultancy – Cranleigh Leisure Centre Feasibility Study Update (September 2021)
 - 4. Cranleigh Leisure Centre energy efficiency and carbon reduction review (February 2020)
 - 5. The Sport, Leisure and Culture Consultancy – Cranleigh Leisure Centre Options Appraisal (July 2019)
 - 6. Indoor Leisure Facilities Strategy (May 2017)
-

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Head of Finance: Rosie Plaistowe, Financial Services Manager, 25/01/23
Strategic Director: Ian Doyle, Joint Strategic Director for Transformation & Governance, 26/01/23
Portfolio Holder: Cllr Liz Townsend, Planning and Economic Development, 25/01/23

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