

**Build More  
Build Better  
Build for Life-  
Consultation  
Statement**

**March  
2022**

## 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	Annual updates to action plan	Andrew Smith	01.04.25

## Version Control Information:

Version	Version Status ( <i>Draft, Approved /Published Internally or Externally</i> )	Date	Version Comment	Version Author
V0.1	Draft	Est 08.03.22	Creation of Consultation Statement, Approved by Management Board	AL & EL
V0.2	Final Approval	Est 05.04.22	Strategy Approved by the Executive	AL & EL
V1	Published	Est 26.04.22	Strategy Approved by Full Council/ 1 <sup>st</sup> Publication	AL & EL

## Impact Assessments and Consideration:

Impact Assessment Type	Required / Not Required	Date Completed	Impact Assessments and Considerations Comment	Assessment Owner
Equality Impact Assessment	Required for strategy	07.03.2022	See attached Equality Impact Assessment	AL & EL

# Document Statement

Waverley is committed to homes to buy or rent for households from all income levels.

The Affordable Homes Delivery 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.

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## Document Improvement

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

Please contact [alice.lean@waverley.gov.uk](mailto:alice.lean@waverley.gov.uk) and [esther.lyons@waverley.gov.uk](mailto:esther.lyons@waverley.gov.uk) Housing Strategy and Enabling Team if you have any comments.

## Related information

[Other Related Council Policies / Information](#)

*Waverley Borough Council Affordable Homes Delivery Strategy*

## Affordable Homes Delivery Strategy- Consultation Statement

1. Waverley Borough Council has drafted an Affordable Homes Delivery Strategy to set out our approach to affordable housing in Waverley. Once adopted, it will be used as a material consideration for planning applications determined within the borough.

## Purpose of the Consultation Statement

2. This consultation statement sets out
  - (i) The persons the local planning authority consulted when preparing the Affordable Homes Delivery Strategy
  - (ii) A summary of the main issues raised by those persons; and
  - (iii) How those issues have been addressed in the amended Affordable Homes Delivery Strategy.

## Regulations

3. Although not subject to a statutory requirement for consultation, the Affordable Homes Delivery Strategy was made available for a minimum of four weeks. During such time, the document was published on the local authority website and made available in hard copy and other formats upon request.

## Consultation

4. The draft Affordable Homes Delivery Strategy was published for public consultation between 27 January 2022 and 24 February 2022 and views were sought on the draft.

## Who did we consult?

5. The Council sought the views of key consultees including developing housing associations, private developers, Parish Councils, planning officers, housing officers and councillors. 70 responses to the strategy were received<sup>1</sup>; 26 responses from members of the public, 19 from Waverley, Town or Parish Councillors, 4 from community groups, 7 from other affordable

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<sup>1</sup> 63 received via survey, 7 received via letter or email

housing providers and the remaining from other groups. 10 respondents were living in or waiting for an affordable home from the Council or another affordable housing provider. 71% of respondents said they found the strategy easy to understand.

## What issues were raised?

Stakeholders were asked to rate how much they agreed (or disagreed) with the objectives proposed and for their comments/ alternative suggestions:

- 67.2% of respondents completely agreed with the objective to build more
- 69% of respondents completely agreed with the objective to build better
- 71% of respondents completely agreed with the objective to build for life

Stakeholders were also asked to rank actions in order of priority, which were placed in the following order:

1. Building more affordable homes
2. Affordability of new homes to residents
3. Creating eco-friendly homes
4. Improving quality and design
5. Creating homes which are flexible for all our stages of life

Stakeholders were then asked whether a 70% rental cap on 1 and 2 bedroom properties and a 65% rental cap on 3 and 4 bedroom properties was about right or should be higher or lower. 52% of respondents said they thought this should be lower, 42% about right and 7% said they thought the caps should be higher.

## How were the issues addressed?

Following the consultation the Affordable Homes Delivery Strategy has been amended to address the issues raised. The representations and Council's response are set out in Appendix 1. A full report from the survey is attached at Appendix 2

## Appendix 1 – Representations and Responses; grouped by theme

### 1. Affordability

YOU SAID	WE DID
Social housing for rental	BB2 amended to make specific reference to our priority for social rents <sup>2</sup>
The document treats all affordable housing as equally valuable to the community which we do not necessarily believe to be the case. It doesn't make any attempt to value social rented housing above any other – i.e. the type of affordable housing that will actually get people off the council waiting list. It just refers to Affordable Housing throughout.	
By using the statement 'affordable homes' this sounds as though the properties are for sale - we need social housing.	See glossary for definition of 'locally affordable homes' BB2 amended to make specific reference to our priority for social rents
To stop building £1,000,000+ properties	The mix of private market housing delivered is set out in the Local Plan. Large dwellings proposed may trigger an affordable housing contribution.
To include current HA tenants in the rent cap.	We work with providers to encourage this but we could not enforce the cap on existing Affordable Rent properties, as the cap would be secured at planning stage in the S106.
BB1 - What land assets review can be undertaken or considerations with landowners can be made to sell land at lower cost to drive down housing development costs? Land carrying a price reduction element would need a condition for low cost affordable home pricing and eligibility.	See Action BB4 on sharing good practice and learning from exemplar authorities and BM3 on creating a level playing field

<sup>2</sup> Green = requires change to strategy

BB2 - What is this strategy contributing to ensure its probability of success in terms of aligning developer returns to commercially viable sales/rental values? Without this, the policy carries a hinderance to its success.	See Three Dragons Viability study
All very good but needs more rental properties.	✓
All commendable, however affordable housing needs to be under £200.000 for the "average" Haslemere population!!!	See ICENI Affordability Study
I was dismayed that only 400 houses of which only 15% would be Waverley built. Firstly the number seems incredibly low. I didn't see any specifics for Dunsfold % of affordable homes to be included in the new garden village development. How will rent cap be funded be explicit on the % below market rate you would expect or percentage of disposable income. If the average pay in Waverley is £29,000 and average rent is in excess of £800 per month; what is affordable ?	30% affordable housing (540 homes) to be developed at Dunsfold Park.  See ICENI Affordability Study. Further explanation on rent cap to be detailed in update to Affordable Housing SPD.
I am very sceptical that the 'affordable' homes will be genuinely so (rather than a spurious definition based on market figures)	See glossary for definition of 'locally affordable homes' BB2 amended to make specific reference to our priority for social rents
High rents and house prices are making people move away and therefore businesses struggle to find staff.	See <i>BFL4 action on employers survey and definition of Locally Affordable Homes</i>
Well designed eco-friendly homes are highly unlikely to be affordable!	The strategy aspires to deliver homes which are as affordable and sustainable as possible. 41% of respondents to the survey ranked building more affordable homes as the most important objective, compared to 17% who ranked creating eco-friendly homes as most important.
These are just what is needed. They will be challenging as the Govt is still not helping getting truly affordable housing built in expensive places like Waverley.	✓



<p>I'm renting a new affordable home via WBC/Vivid. I was formerly a WBC tenant and my rent now is much higher on this newer property. As a single mum this is a big worry. If my almost 1k a month rent rises too high I won't be able to afford to stay here. I would appreciate my 2yr old home being included in any rent cap.</p>	<p>We work with providers to encourage reducing rents but we could not enforce the cap on existing Affordable Rent properties, as the cap would be secured at planning stage in the S106.</p>
<p>Affordable homes are not 500k</p>	<p>✓</p>
<p>What is affordable housing?</p>	<p>Housing for people not able to afford housing on the open market Difference between Government/ NPPF definition and what is affordable to households in Waverley in relation to local house prices and incomes, which is why the strategy is using 'locally affordable housing' to distinguish</p>
<p>Rents could be discounted in line with earnings to allow for affordability</p>	<p>✓</p>
<p>The idea is great but I am very suspicious of any developers. Shared ownership is a disaster for most people who think they are 'buying' their property, please do not go down that route.</p>	<p>See ICENI Affordability Study. Further details of preferred tenure split to be set out in updated Affordable Housing SPD.</p>
<p>These luxury property developments that spring up all over the village where I live and have always live is criminal. I am a tenant of a property with no hope of saving for my own home not unrealistic schemes like help to buy and shared ownership</p>	<p>✓</p>
<p>To add again more social housing to rent at same rent levels as current Waverley tenants, offered first to local tenants to downsize. The only factor you should be focusing your time on is helping to lower rents, so people in lower income do not struggle each month to pay the private housing associations extortionate rents. £1,200 a month for a 3 bed, when only 1 parent working is too high.</p>	<p>See glossary for definition of 'locally affordable homes' BB2 amended to make specific reference to our priority for social rents</p>

<p>As regarding capping affordable rents, I consider keeping them all at the lower figure of 65%. My thinking here is that people renting their 1 and 2 bedroom first homes are probably just starting out on their independent lives having perhaps just left full time education. They may still be living on the Minimum Wage level or not much more. Helping them on to the housing ladder to start their independent lives is both a positive and notably popular policy for WBC to pursue</p>	
<p>More council housing to rent</p>	<p>✓</p>

## 2. Rent Cap

YOU SAID	WE DID
It's at the right level to reflect local affordability of rents	✓
Not everyone can afford market rents	✓
Even 65% of market rent will not be affordable for many.	BB2 amended to make specific reference to our priority for social rents
Still too expensive	
It is still unrealistic for most people	
The council wastes far too much money already on providing free housing	
Rents on the open market are very expensive. Rents should be in accordance with what people earn.	See glossary for definition of 'locally affordable homes'
Rents in our area are far too high - capping is the only way to go and should probably capped even more!	BB2 amended to make specific reference to our priority for social rents
I pay £1,200 a month for a 3 bed in Cranleigh, compared to only £650 in Hampshire	✓
The market is out pricing Waverley residents	✓
If average income is £29,000 per year what is the average rent? Without this it is hard to say what is affordable.	See ICENI Affordability Study.
Cost of living in Surrey and need to have a car for many out of town developments mean low-income families need rents to be as low as possible.	✓
Still put them out of reach of a lot of people on lower income	BB2 amended to make specific reference to our priority for social rents
Its important to be significantly lower than market rate so as to try to drag the open market rates down. It should not be too low as there is not enough affordable rented properties in the borough yet so is unfair on those unable to get to the top of the housing list i.e. people without children, non-vulnerable people, single people, etc.	✓
This is realistic and achievable	✓

70% of market rent is hardly affordable for a single person on a low income.	BB2 amended to make specific reference to our priority for social rents
Any lower might cause issues with scheme viability. It's closer to a social rent without the constraints that would bring.	✓
These rents are about right but you do need to think about affordability and housing for single people with one child who would be in a two bedroom home. You also need to think about housing for single people. I would like to see flexible housing for single people included in the plan and I think you need to think carefully about the rent cap for these as they are often people with the least disposable income	BB2 amended to make specific reference to our priority for social rents
As we pay for higher rate	Noted
About right for 3 and 4, a little lower for 1 and 2 as even 70% is to high especially for a single income household	BB2 amended to make specific reference to our priority for social rents
The market has been driven by landlords. It needs to be regulated and it isn't	Regulation of private market not included in the scope of this strategy
The proposed caps are still very expensive for many however I understand that viability is an issue with lower percentage caps.	✓
Affordable homes should be affordable to those on local incomes which is below 50%	BB2 amended to make specific reference to our priority for social rents
The rent level is lower than that required by government, which is welcome	✓
Personally I would prefer to see alignment to nationally understood rent models of affordable rent and social rent, rather than a new model being introduced.	We need a range of options to meet the needs of Waverley residents. See glossary for definition of 'locally affordable homes'. BB2 amended to make specific reference to our priority for social rents
Waverley is overpriced	✓
With a government standard of £270,000 provided to first time home buyers, often times renting may be the better option with the cost of living standard and the	✓

wage one pays calculated over a ninety minute session on unemployment rates and on housing availability.	
Affordable rents should be no greater than the rent price cap	✓
Rents and mortgages are too large a portion of peoples' incomes. This cripples the local economy.	✓
BECAUSE WE NEED TO RECOGNISE THAT MANY PEOPLE CANNOT AFFORD OPEN MARKET RENTS	✓
It's hard living on your own and having to deal with all the expenses. The council rent should be cheaper	BB2 amended to make specific reference to our priority for social rents
The rents should be funded from the existing council budget and there should be no increase to fund further reduction in rent.	Rent caps would be secured in S106 agreements for new developments. See Three Dragons viability update report.
Market rents are so high that even 65% will be unaffordable for some	BB2 amended to make specific reference to our priority for social rents
BB2 Affordable Rents should be capped at 60% of market rent for 3 and 4 bed properties, because of affordability.	There is a need to balance with viability considerations, however alongside Affordable Rent caps this strategy makes specific reference to our priority for social rents.
Provided all developers and HA's are required to keep to the rent regime so that they can't change the rent levels later in the process as this would not be a level playing field	Rent caps would be secured in S106 agreements for new developments.
Seems a sensible trade off between viability and delivery and the very high market rents in Waverley	✓
Possibly lower as this area has some of the highest private rents	BB2 amended to make specific reference to our priority for social rents
If one and two bedroom homes are mainly bought by first time buyers already living in the area, then many of them will be on low income/early in their careers. I suspect tath getting started is really difficult.	✓

Our experience suggests that applicants for 1 and 2 bedroom homes struggle more with affordability than those in the larger homes. Therefore we would suggest capping affordable rents at 65% for homes with 1 and 2 bedrooms and 70% of open market rents for homes with 3 and 4 bedrooms.	Suggested rent levels based upon evidence and local incomes. BB2 amended to make specific reference to our priority for social rents
Even with the discount rents will be unaffordable to some key workers i.e. carers.	
The area we are looking at in the Accommodation with Care and Support Programme is specialist housing so it is anticipated that these affordable rent levels will not apply to these settings.. Whilst we have answered 'about right' it is whether this will be achievable in Waverley.	✓
I'll be guided by you - as I'm not knowledgeable about rental rates	Noted
Affordable rents should be linked to costs and acceptable minimum profit not driven by market conditions which are often set more by speculation than fairness	See ICENI Affordability Study and Three Dragons Viability Update report
Need to be mindful to ensure that 3 beds don't pay more than the 2 beds as this would be unfair. Need to be careful that the rents are not too low to make them unviable for housing associations to deliver.	See ICENI Affordability Study and Three Dragons Viability Update report
The lower the rent the less affordable housing can be delivered. Cap at Local Housing Allowance.	LHA rates are not affordable for low income working households. See ICENI Affordability Study.
Old council tenancies were much cheaper. For single parents high rents are a huge stress.	BB2 amended to make specific reference to our priority for social rents
I think it should be as low as possible. If property can be developed cheaper then the rent should be less. It should be not for profit and not for loss.	BB2 amended to make specific reference to our priority for social rents
The major problem in Waverley – and particularly in Farnham – which is the potential purchase/build cost of each of these AH units, which need to firstly be accurately defined and established. A current house purchase cost of 93% higher than the National Average in the Waverley Borough Area, and I have heard a figure of 98% higher quoted for the Farnham Town	See ICENI Affordability Study and Three Dragons Viability Update report

Area. These figures are perhaps not ideally the basis for anyone building affordable AH units here.	
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### 3. Perpetuity

YOU SAID	WE DID
Ensure that "affordable homes" remain as "affordable homes" and do not eventually end up in the ownership of private individuals	<i>Perpetuity issue – see Action BM3 on legal agreements securing affordable housing and lobbying to change Government Policy</i>
I think affordable in perpetuity needs to be in there. It doesn't feel right when only the first resident benefits.	
Ensure at least some affordable homes are affordable in perpetuity by preventing owners from purchasing the homes completely. This is the Build for the Future Objective.	
The Build for Life Objective should include that properties remain affordable for life, i.e. in perpetuity.	
We acknowledge the inclusion of the Haslemere CLT within your goal of exploring new ways to work in partnership (BM4) and look forward to continuing to work with Waverley. One issue that is central to our strategy is ensuring some affordable homes remain affordable in perpetuity. This is an objective of Haslemere's Neighbourhood Plan policy HNP 4.2 and is essential if we are to have affordable housing to offer to future generations. We suggest that consideration is given to including actions within your Strategy that would secure some affordable homes in perpetuity.	
The Build for Life Objective should include that properties remain affordable for life, i.e. in perpetuity	
We acknowledge the inclusion of the Haslemere CLT within your goal of exploring new ways to work in partnership (BM4) and look forward to continuing to work with Waverley. One issue that is central to our strategy is ensuring some affordable homes remain affordable in perpetuity. This is an objective of Haslemere's Neighbourhood Plan policy HNP 4.2 and is essential if we are to have affordable housing to offer to future generations. We suggest that consideration is given to including actions within your Strategy that would secure some affordable homes in perpetuity	
Disagree that the % is lower on larger properties. We believe any new housing stock built by the council should remain as social housing in perpetuity and not subsequently sold to a tenant.	



<p>Inclusion of strategies to ensure the affordable housing stock is not severely depleted through right to buy and rent to buy is important. We will just be facing the same issues forever if we don't retain more affordable homes in perpetuity</p>	
<p>The AH Units should be secured in Perpetuity (S106) by the Local Authority to prevent them being sold on in the future</p>	

#### 4. Sustainability

YOU SAID	WE DID
Enhanced level of quality and a commitment to providing an absolute green solution with enhanced energy saving solutions. Future proofing all new designs and proposals	✓
The key criteria is ensuring that affordable housing is located close to work opportunities, services such as; good public transport, doctors and dentists within walking distance, shops and leisure facilities.	<i>These comments relate to location of any housing development. See Local Plan and forthcoming review. Locations considered suitable for market housing are suitable for affordable housing.</i>
Build nearer to local amenities and public transport options	
Focusing on walkable communities, not cramming more people into overpopulated space	
All new developments will meet requirements to reduce routine vehicle use and encourage and enable walking cycling and community transport	
They seem to promote/facilitate Greenfield development away from local amenities when people who need affordable housing often rely on the very local amenities Greenfield development is often not anywhere near.	
There is no point building affordable homes in rural locations where access to good public transport, doctors and dentists (within walking distance), shops and leisure facilities are severely limited	
We should be looking to minimise environmental impact and recruitment. I'm thinking about the housing development proposed for the Royal infant school. It would be far better to move the light industrial park behind Haslemere station to this location and use the space next to the station for apartments. I would reduce congestion and pollution	
<b>BB3</b> - Can we be more explicit about demanding homes built for low living costs; e.g. near zero heating, reduced council tax etc?	
Please make sure the homes are cheap to run and although well insulated, not a boiling hot oven in the summers like my house!	See BFL1; link between energy efficient homes and reduced bills for residents.

"BFL1 should spell out more emphatically the need for all new affordable homes to incorporate solar panels or other energy saving measures.	
Use better building materials when building new homes, not just use the cheapest materials	✓ See BB3 and BFL1
Waverley should be ahead of the curve in sustainability and age-adaptability, not simply meet the existing standards.	✓ See BB3 and BFL3
In addition, all new housing, extensions and retrofits should meet the highest quality and value-for-money eco building standards from now on to contribute to the climate emergency targets.	For approach to retrofitting existing Council stock, see Asset Management Strategy.
There needs to be well thought out strategies behind these objectives to ensure that any 'green' requirements are practical, well thought through and deliver improvements long into the future life of the properties built. 'Bolt-ons' need to be given careful thought, as do, requirements over and above building control standards which could impact the deliverability of schemes.	✓
Some terms need more explanation. What eco-friendly measures will be used? How will homes be made more flexible?	See Sustainability SPD, Waverley Housing Design Standards, Asset Management Strategy
The terms greener and eco-friendly are a bit vague - may be better to say 'energy efficient, low or net zero carbon' for example.	
Be aware that "Heat Exchange systems" involve a noisy electric pump running 24/7 – not really ideal!	We will explore new technologies to meet our Climate Change commitments in line with the Climate Change and Sustainability SPD, Waverley Design Standards 2021 and Asset Management Strategy
We welcome the actions for achieving an appropriate mix in terms of location, size, type, tenure and design (BB3) based on up-to date information (BB1), the environmental sustainability and quality of affordable housing (BFL1) and planning for accessibility requirements (BB3), older people and people with specialist needs (BFL3). The use of the term "locally	✓

<p>affordable housing” in the Strategy, aligns with the term we have been using - genuinely affordable for local people. The action to cap Affordable Rent levels (BB2) should aim to make rents locally affordable. This may be better achieved through metrics based on local wages rather than market values especially in areas such as ours where there can be significant variations in market rents for properties with the same number of bedrooms.</p>	
<p>These new AH homes must be up to all eco – friendly standards, including EV charging points provided for each of them. This may prove very difficult to achieve in the case of AH homes vs. Developers and others profit margins. These AH homes should be built with all generations of tenant occupiers in mind.</p>	<p>See Sustainability Supplementary Planning Document</p>
<p>Looking at where new schemes are developed e.g. 2 x rough sleepers schemes in Godalming/ Farncombe; would be better to try and find opportunities in different parts of the borough. Needing to make sure it’s a stepping stone rather than a permanent home, in order to free up for another homeless household and help that person move onto more settled accommodation</p>	<p>Noted</p>
<p>I see that the named sites for development are all in rural areas. It would have been helpful in the interests of perceived fairness to have included some town sites</p>	<p>Full breakdown of developed sites to be set out in yearly updates, including continued WBC regeneration at Ockford Ridge</p>
<p>The consultation concentrates on buildings, and I was disappointed that there doesn’t seem to be any mention of the facilities that house occupiers will need: access to shops and other retail outlets, high-quality green spaces, nearby facilities for children, transport links and others</p>	<p>See Local Plan policies</p>
<p>Include infrastructure in your plans - roads, doctors surgeries and NHS dentists.</p>	
<p>Towards community living surround a village with a central hub on media entertainment geared towards all types of demographic populations. Migrating Londoners out from the nine million inhabitants to other parts of the country such as Reading.</p>	
<p>BFL3 - Develop a community policy for maintaining and using public facilities and neighbourly oversight (help in the community phone lines/websites/Moderated Social Media Groups).</p>	

BB4 - Be explicit about target groups for affordable homes and also the service access/security proximity for vulnerable groups such as single mothers under police or LA protections	See change to BB4; also Waverley Homelessness Strategy.

## 5. Keyworkers

YOU SAID	WE DID
<p>I think you need to clarify how you target selection of people for affordable housing - do you for example use it to attract/support key or essential workers? The selection criteria is not clear and it would be useful as an employer to see that as it could be part of our attraction strategy</p>	<p>See <a href="#">Key Points of Waverley's Allocation Scheme</a>.</p>
<p>Subsidised houses for local teachers and emergency service workers</p>	
<p>Ensure the key worker housing includes support for wider than the health care sector.</p>	
<p>And the links between housing, employment, services, economies etc. For example, recruitment/ retention issues by employers such as the Ambulance service, in terms of staff being able to live locally to respond rapidly to emergencies</p>	

## 6. Equalities

YOU SAID	WE DID
We need more affordable housing for older people	See BB3/ BB4, Strategy amended to make specific mention of downsizing
The theory sounds great. But please don't forget that older people need homes too	
Move people out of properties that I no longer suitable i.e. 2 bed house for a lone person. Help the people on the housing list to move	
The Affordable Homes Delivery Strategy should include consideration of the Intermediate Housing Market and equity-rich downsizers who could invest in well designed, intergenerational eco housing projects. A priority should be to encourage all sectors of the housing market to 'get moving' to free up properties suitable for retrofits, cusping (sub-dividing), new builds, etc. Often, older property owners are living in unsuitable, large, hard-to-heat properties, but have too few incentives to move. High quality, eco homes, that have strong community cohesion designed into their layouts might just be the incentive they need. A small proportion of these home owners may well be willing to invest part of their equity in a community project that prioritises well-being and the environment over financial returns on their capital	
Down-sizing; What is the incentive for people to leave a large family homes into a 1 bed flat? Needing an extra bedroom for medical needs, storage, having relatives to stay. Giving people options and choices. Planning for the future but making that move more appealing, in order to free up a family house for another household. Making best use of supply to meet needs. Looking at where these properties are; not wanting to leave an area of family/ friends E.g. 2 bed bungalows.	
Opportunities for cutting edge supported living. Realistically affordable housing for Neurodiverse	
We would recommend adding the following to 'Build for Life Objective':	New action added to BFL3

Add consideration for homes for any stage of life for people with disabilities including physical, learning disabilities and autism and mental health disabilities	
It would be good to reflect the different housing needs of different Waverley residents and to include more about disability access. Housing for people with different disabilities may require different adaptations or design features e.g. - What proportion of Waverley residents use wheelchairs? - How does this strategy address their housing needs? What proportion are autistic? - How does the strategy reflect this - etc.	See Equality Impact Assessment
Assurances that any identification of Specialist housing are run through Adult Social Care Commissioning.	✓
Tenant engagement. Making sure the strategy is suited to the right audience, e.g. short article in Waverley Homes and People, full detail for housing associations	Noted
Compliance with part M across all new developments for all properties.	See Local Plan.
Build better should include disability accessibility, including better accessibility for autistic people. The BSI is in the process of producing guidance on this	See BB3.
The Waverly borough council has been helpful to allow autism friendly housing to be constructed. With property investment individuals, my own comment wants to put a foot through the door in a showing of properties being improved on and where I can start on a building worker job performing tasks in building property and maintenance; if I need to go back to college and obtain a degree or what requirements are needed for plumbers and electricians whether these are family trades and how new a living situation is for an individual having spent ten years in America with Father to then return to Mother living in South East England.	Waverley is lead authority on the SCC Autism Housing Workstream
We would ask whether this has been made available in different formats provided by default which avoided the use of tables to enable the documentation to be fully accessible to everyone.	Final strategy to be reformatted to meet accessibility requirements
The interworking with councils, providers etc on affordable housing is a good idea	Noted



## 7. Viability

YOU SAID	WE DID
<p>How does the strategy, affordability study and viability study link up?</p>	<p>The affordability study looks at house prices and rents etc in relation to incomes and the First Homes viability study looks at whether various tenure and bed size mixes are affordable to the developer. Both studies form part of our evidence base which support the housing strategy</p>
<p>Haslemere has suffered significantly because developers have used viability assessments to “prove” that they cannot include policy level affordable homes in their developments. We strongly support the action that requires independent scrutiny of viability assessments by a consultant from the Viability Panel Framework (BM3). Regarding the action to lobby central government for policy change to support delivery of locally affordable housing (BM3), we frequently participate in campaigns organised by the National Community Land Trust Network and may be able to assist with this</p>	<p>✓</p>
<p>We would suggest a change to the section which has as its action “To challenge every planning application that makes a viability case to reduce affordable housing”, and add "and/or change the tenure split from the approved and adopted Council policy".</p>	<p>Noted and amended under BM3.</p>
<p>The Parish Council ask if penalties can be introduced to developers, based around provision and funding of affordable homes for failing to build out land in terms of limitations on granting future permissions or setting future conditions on developments?</p>	<p>Where Homes England or Waverley commuted sum funding is awarded for affordable housing, this must be repaid if not built out or converted to private market housing.</p>
<p>Hold developers to their promised percentage of affordable housing within every application granted</p>	<p>✓ See BM3</p>
<p>We were supposed to be insisting developers provided a proportion of affordable homes before but they seem to have avoided this by building them last and not completing. All affordable homes projects should have a</p>	<p>S106 agreements include as standard a requirement to commence work on the affordable homes by a</p>

<p>legal requirement for satisfactory completion before other developments can proceed.</p>	<p>specific stage in the programme so that they are not completed last.</p>
<p>Build AH compulsorily on every new larger development</p>	<p>See Local Plan policy AHN1.</p>
<p>In pursuing this strategy, we would suggest that consideration be given to taking a more robust stance during the planning process to encourage developers to include affordable housing in all suitable developments.</p>	<p>Noted &amp; see BM3.</p>
<p>A personally experienced and serious Planning Word of Warning and advice for WBC to very carefully note here. The FTC Planning Consultative Group and WBC Planning Committee Members have all witnessed reasonable Major Planning Applications for many houses from Developers and others which - with a few added FTC/WBC Conditions - have then been Passed. Then soon afterwards the Developer comes back in with an Amendment to the already Passed Planning Application advising that they have on later reflection found that they cannot actually afford to include many - or even any - of the AH on site as this would be detrimental to their profit margins. This Amendment is then usually Refused by the FTC/WBC Planning Members, but the Developer then frequently wins it at the Appeal Stage. Take a most careful note of this here please! The AH build percentages per Application must be firstly written into Planning Law by the Government and into the WBC Planning Conditions as soon as possible to avoid further Developers and others escaping their required responsibilities for these AH builds</p>	<p>The Viability Panel Framework will be used to independently assess viability cases at application stage and those made retrospectively through applications for a Deed of Variation.</p>

## 8. Design & quality

YOU SAID	WE DID
I haven't seen anything about outside private amenity space for every property, including flats. Hopefully that comes into "improved quality and design"	See Affordable Housing Supplementary Planning Document
Please also consider building some really modern, architecturally interesting homes rather than the boring boxes that usually go up. Gratton Chase in Dunsfold is a good example of more modern styling compared to the usual dull big house builder designs.	See Local Plan policies
The overall quality of new build is shameful all planning strategies must find some way to ensure quality in depth and at each stage of construction with detailed plans and specifications handed over as a completions pack.	Not included in the scope of this strategy
I was unable to access the Housing Design Standards Report lodged in SharePoint. The strategy should require design standards to go above and beyond the nationally described space standards, which are unsatisfactory. I would expect the strategy to set higher space requirements for affordable housing."	Available on <a href="https://www.mod.gov.uk">modgov</a> : Noted
I was involved in the review of design standards... Looking at loft space creatively, making best use of available space and not wasting space. Thinking through the life of a building/ life stages of people living there	Noted
We support your intention to survey residents once they have been living in their homes post development completion. But would suggest conducting the survey at 12 months as opposed to 6 months as this is when the 12 months defects period is complete.	Noted
Surrey Police, especially their Designing Out Crime Officers, will need to be involved at an early stage to ensure that estates are designed to be as criminal-hostile as possible	See Development Management policies
Build better must be backed by an inspection and enforcement regime or the builders will still be driven by cheapest shortcut	See Planning Enforcement and Building Control policies

This is probably included, but design areas to facilitate community interaction	Noted
As part of the build better objective - well designed to include full Nationally Described Space Standards	See Affordable Housing Supplementary Planning Document
I suggest that these AH units are individually integrated in all the new larger house building projects, and therefore the Planning Applications for them must now include the relevant percentage number of AH units they each attract in all of these. I strongly advise that these AH Units are not built on purely specific sites because it could potentially create a location that may then attract some local stigma	See Affordable Housing Supplementary Planning Document

## 9. Self Build and Community Led Housing

YOU SAID	WE DID
<p>It has failed to address the need to provide self-build opportunities.</p> <p>This is a major part of the solution in an area like Waverley. Most people would love to own their own home but are priced out. They are not on low incomes or vulnerable, just priced out. Providing self-build plots would lessen the pressure to provide social rented properties and allow better council investment for those most vulnerable and on low incomes. (Schemes like shared equity simply continue to inflate the market and provide people with smaller portions of smaller homes whilst paying a higher proportion of income than any other generation for the privilege. That should not be a significant part of the solution.)</p> <p>Is the council aware that it would be more affordable to local people to buy a serviced plot from the council and build a house themselves with a self-build mortgage than to buy a one bedroom open market flat in Waverley?</p> <p>The council has the power to acquire land for development and could easily add self-build to the mix a new scheme.</p>	<p>Not in the scope of this strategy</p> <p><a href="#">See self build pages</a> on Waverley website</p>
<p>I would have liked to have seen an opportunity for CLH at Dunsfold, I think this is a missed opportunity to give something back to the local communities whose infrastructure is likely to suffer as a result of the development. A CLT for the area would be an ideal vehicle to hold not just affordable homes but any other community assets.</p>	<p>Officers will explore opportunities as Dunsfold Aerodrome scheme progresses</p> <p>See <a href="#">Dunsfold Park Garden Village Supplementary Planning Document</a></p>

## 10. Miscellaneous

YOU SAID	WE DID
We support the aim in the proposals to involve Parish Councils in plans at an early stage.	✓
I would require a demand forecast to be able to determine if the strategies will be effective. Therefore a good forecast is essential to determine if the strategies will be effective Construction worker and architecture projects for house buyers to give their testimonial how they were able to live independently.	See Development Team and Affordable Housing Provider demand and supply forecasts, Affordability Study and Housing Needs Register
Build despite the NIMBYs	✓
Building more home	✓
Shorten length of time taken to supply. Increase commuted charges to increase funds available for affordable housing	See Affordable Housing Supplementary Planning Document, commuted sums need to be equivalent to what is would cost a developer to provider on site
The Parish Council agrees to a review of council land at both Waverley and Parish Level for a strategic view of use for funding of Affordable Homes Schemes and Locations	Noted
The Parish Council asks if this project can be linked to One Public Estate or is this a moribund scheme?	Officers to explore
BFL2 - Strategic concepts around creating community links, communication, forums for a "pride of ownership/tenancy".	See Build Better priority
I highly support but feel there is a lack of hard data to fully assess if it will be achievable	See Development Team and Affordable Housing Provider demand and supply forecasts, Affordability Study and Housing Needs Register
There will be a mountain of caveats which will be enforced so it is too early to say	Noted

Doesn't actually give any details of rental v buy	See glossary for definitions of affordable tenures
Letting the individual go through life to come up with the idea every once in a lifetime of being involved with property investments.	✓
I have concerns about the intention of wrapping up non-s106 homes into local restrictions, as this could limit investment and RP competitiveness on land acquisitions. Ultimately this could harm the quantum of affordable homes that get delivered locally.	Review local connection requirements as part of Affordable Housing Supplementary Planning Document update
BM3 and BM4 - when an RP delivers an 100% affordable site using Homes England funding there cannot be any restrictions on Shared Ownership applicants and no local connection criteria. For sites that do not have grant funding, would request that the shared ownership nominations be carried out by the RP?	
I note that WBC's target is 400 new homes up to year 2025. This is very commendable. I read that WBC is committing to build 60 Affordable homes (AH) by themselves, and investigating Developers and others to build the remaining 340 AH. With my personal knowledge of Local Planning issues this is an ambitious but possibly achievable target for Developers.	✓
WBC has ranked 5 actions in order of importance. I consider that they are all of equal importance.	✓
What are the links between this strategy and our work as a Landlord?	Strategy covers building on new affordable homes by the Council and our partners, usually a housing association. We've been asked to limit the scope of the strategy to just concentrate on new homes, so it doesn't cover homelessness, housing advice, private sector housing, maintenance/ repairs etc. Those are covered in more detail in separate strategies. We've got more control of our own new build

	programme, for example on the quality and design but we want to lead by example and produce exemplar affordable housing
Learning from the private sector... Cranleigh retirement village/ gated communities. Providing social support as well as appropriate housing. Although we can't do everything the private sector can do, if something isn't working, we should look to learn lessons about alternatives	✓
In addition, with increasing numbers of shop closures in our town centres, further consideration could also be given to changing the use of some town centre commercial properties to residential usage.	See Local Plan policies



## 11.I think this strategy is easy to understand

I understood it!
Easy to follow. Makes sense
Set out well.
It's written in plain English
Affordability, quality, environmentally friendly and long lasting housing makes good sense to me.
Clearly explained
It's clearly and simply explained
It is relatively straight forward
Straightforward
Clear Objectives
Clear High Level Objectives
Parts easy, others require research/further knowledge
It is clearly set out with easy to understand objectives with a clear means of delivery and monitoring.
The aim is fairly clear but needs to include a high-level statement on how it will be achieved or it will be just nice words that get forgotten
It is clear and concise
Seems clear
I do accept that the Affordable Homes Delivery Strategy is quite straightforward and easy to read and understand for me, but I am an experienced Councillor. Some members of our public might find it rather hard going though!
Yes, as affordable housing delivery was part of my role before retiring. It is not so easy to understand for a lay person.
It is well presented with a glossary.
It is well laid out and the glossary at the back is very useful.

## 12.I do not think this strategy is easy to understand

Focuses too much on the needs of council and not the tenants
Too many unanswered possibilities
Unduly detailed
It has to cater for so many differing perspectives and so it's inherently complicated. A simple strategy would be nice.
Too many policies and how many strategies do you need? build new homes, make them affordable, use good design standards

### 13. Positive Comments

<b>YOU SAID</b>
I think it is really good - well done Waverley
Keep doing what you are doing!
In general I support and applaud the strategy - we desperately need new houses of all types in the borough
Well presented and objectives are clearly set out, which hopefully encourages greater endorsement.
We support the Waverley Affordable Homes Delivery Strategy (the Strategy) and agree with the actions proposed. It addresses most of the issues we have identified and is proposed at a critical time for affordable housing in our town. After years of very few affordable homes being built, many should be delivered in the coming years as the allocated sites within the Local Plan part 2 come forward for planning permission and large sites that have already been granted permission are built.
We are fully supportive of these objectives. The objectives fit in with Surrey's Accommodation with Care and Support Programme and follow our joint ambitions in the Surrey Climate Change Strategy and environmental policy.
We support the aim in the proposals to involve Parish Councils in plans at an early stage
The objectives are good
These are excellent!
<ol style="list-style-type: none"> <li>1. Build more – if possible.</li> <li>2. Build Better – yes, certainly, up to the full eco standard.</li> <li>3. Build for Life – yes, very much so for all generations of tenant</li> </ol>
Hambledon Parish Council has always been supportive of affordable housing and is therefore in agreement with Waverley's proposed strategy.
<p>Godalming Town Council welcomed the new Waverley Borough Council Affordable Housing Strategy document "Build More, Build Better, Build for Life 2022-2025", in particular the following commitments:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> new homes built will cater for all income levels, including households on the lowest incomes;</li> <li><input type="checkbox"/> to create high quality homes in attractive environments;</li> <li><input type="checkbox"/> to forge stronger links with town and parish councils, to better understand what is working and what needs to change, to create homes that work for all of our community, including early consultation with councils about affordable housing issues in their area; and</li> </ul>

to develop affordable homes which are both built sustainably and enable residents to live in a more environmentally sustainable way.

In recognition of the Affordable Housing Strategy, Godalming Town Council's Environment & Planning Committee wishes to support the provision of local high quality affordable and social housing by:

- working closely with Waverley Borough Council;
- identifying opportunities for land use, change of building use or other means to develop social housing, including on land and properties directly controlled by the Town Council;
- supporting a housing needs survey in alliance with Waverley Borough Council to identify local affordable and social housing needs in detail;
- highlighting significant planning applications in the town for opportunities to work with developers to provide affordable and social housing;
- working with all parties to ensure that existing local residents and key workers have priority for affordable and social housing; and
- supporting local self-build schemes.

## 14. Negative Comments

<b>YOU SAID</b>
It should be discontinued and you should refund or outrageous council tax bill and stop wasting our tax money
I will believe it when I see it
It's all talk and no substance
It offers aspiration but nothing to say about how it will be achieved
These objectives are fluff
Try visiting and interviewing current people who rent alleged affordable homes
I keep seeing 'partners' in it and I wonder who you will be using to build these properties and what their cut will be.

# Appendix 2; Consultation Survey Results Report

3

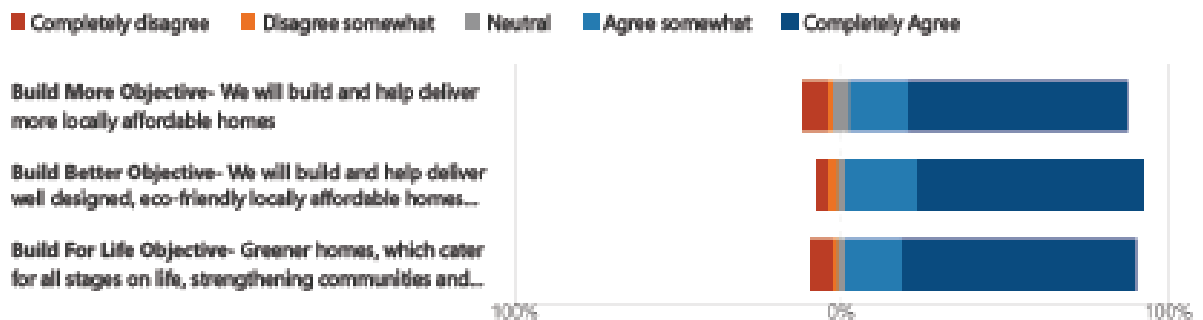
## Affordable Homes Delivery Strategy Consultation Survey

**63**  
Responses

**11:13**  
Average time to complete

**Closed**  
Status

1. Please tick a box to rate how much you agree with or disagree each Council objective for our Affordable Homes Delivery Strategy



2. Would you like to suggest any alternative objectives?

**32**  
Responses

Latest Responses

"Waverley Borough Council's pledge of 'we will' is to be commended. T...

"Built in the right places - The towns and villages have different needs ...

9 respondents (29%) answered Build for this question.



<sup>3</sup> 63 responses received via survey, 8 received via email

3. Any comments on these objectives?

37

Responses

Latest Responses

"- Build More- we will build and help deliver more locally affordable h...

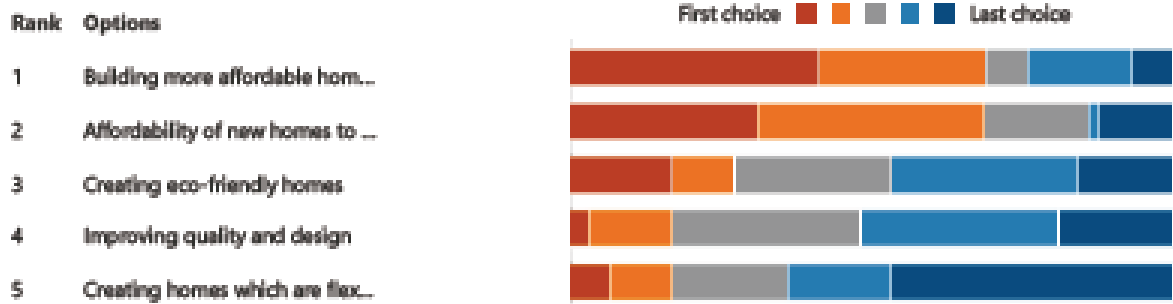
"The information base needs to be updated very regularly - the 2020 L...

"I welcome the new Strategy , in particular the following commitments...

9 respondents (25%) answered needs for this question.



4. Please drag and drop the following 5 actions to rank them in order of importance, top or 1 for most important; bottom or 5 for least important:



5. 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?

<span style="color: blue;">●</span> About right	25
<span style="color: orange;">●</span> Higher	4
<span style="color: green;">●</span> Lower	31



6. Please give a reason for your answer

53  
Responses

Latest Responses

- "With rent being 53% higher in Waverley than the national average, r...
- "The research seems to support this"
- "Waverley has exceptionally expensive housing which is not reflected i...

33 respondents (63%) answered rent for this question.



7. Do you think the Affordable Homes Delivery Strategy is easy to understand?

<span style="color: blue;">●</span> Yes	42
<span style="color: orange;">●</span> No	17





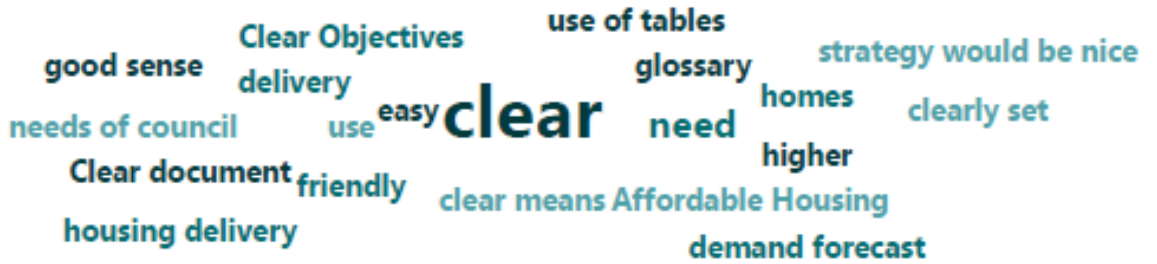
8. Please give a reason for your answer

38  
Responses

Latest Responses

"The content is straightforward and the tables break down the process."

7 respondents (19%) answered clear for this question.



9. Do you have any further comments about this strategy?

32  
Responses

Latest Responses

"Waverley Borough Council has larger developments with affordable h..."

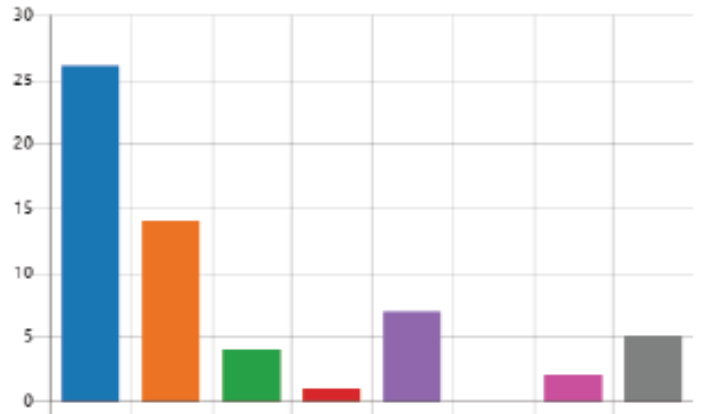
"No"

9 respondents (29%) answered housing for this question.



10. Please select the statement that best describes you...

● Member of the public, living o...	26
● Waverley Councillor/ Town or ...	14
● Community group, Communit...	4
● Private rented sector landlord ...	1
● Affordable Housing Provider	7
● Housing support, care or othe...	0
● Development, construction or ...	2
● Other	5



11. Are you currently living in, or on a waiting list for, an affordable home provided by the Council or another affordable housing provider?

● Yes	10
● No	50



12. Are you responding on behalf of an organisation?

● Yes	17
● No	43



13. What are your organisation's key housing related issues and priorities below

16  
Responses

Latest Responses

*"Waverley Borough Council must fully consult and engage with Towns ...*

*"Advising clients who, among other issues, are seeking low cost housin...*

6 respondents (40%) answered **affordable housing** for this question.



14. Is there anything the Council or others might be able to do to help you address them?

14  
Responses

Latest Responses

*"Insufficient time has been given to enable a full response from Farnh...*

*"Work with us to help us understand your systems and in return we m...*

5 respondents (38%) answered **housing** for this question.



15. Gender

<span style="color: blue;">●</span> Female	21
<span style="color: orange;">●</span> Male	19
<span style="color: green;">●</span> Prefer not to say	1
<span style="color: red;">●</span> Prefer to self describe	1



16. Prefer to self describe

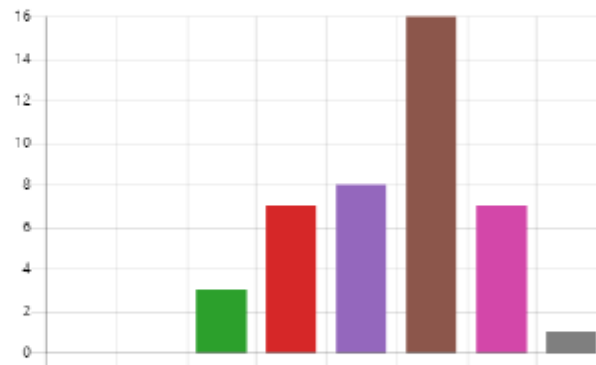
1

Responses

Latest Responses

17. Age group

<span style="color: blue;">●</span> Under 18	0
<span style="color: orange;">●</span> 18-24	0
<span style="color: green;">●</span> 25-34	3
<span style="color: red;">●</span> 35-44	7
<span style="color: purple;">●</span> 45-54	8
<span style="color: brown;">●</span> 55-64	16
<span style="color: pink;">●</span> 65-74	7
<span style="color: grey;">●</span> 75+	1



18. Occupation/ employment

Which best describes what you are doing at present

<span style="color: blue;">●</span> Working	25
<span style="color: orange;">●</span> Retired	12
<span style="color: green;">●</span> Unemployed	3
<span style="color: red;">●</span> Student/ training	0
<span style="color: purple;">●</span> Other	2



## 19. Disability

Do you have a physical, sensory or mental condition or illness lasting or expected to last 12 months or more?

● Yes	6
● No	35



## 20. How would you describe your ethnic origin?

● White	40
● Mixed or Multiple Ethnic Grou...	0
● Asian or Asian British	0
● Black, African, Carribean or Bla...	0
● Other ethnic group	2



## 21. White

● English, Welsh, Scottish, North...	35
● Irish	1
● Gypsy of Irish Traveller	1
● Any other White background	3



## 22. Mixed or Multiple ethnic groups

● White and Black Caribbean	0
● White and Black African	0
● White and Asian	0
● Any other Mixed or Multiple e...	0

### 23. Asian or Asian British

Indian	0
Pakistani	0
Bangladeshi	0
Chinese	0
Any other Asian background	0

### 24. Black, African, Caribbean or Black British

African	0
Caribbean	0
Any other Black, African or Car...	0

### 25. Other ethnic group

Arab	0
Any other ethnic group	2



### 26. Any other ethnic group (please write in)

1  
Responses

Latest Responses

### 27. Sexual Orientation

Which of the following best describes your sexual orientation?

Heterosexual/ straight	30
Bi/bisexual	1
Gay/ lesbian	2
Prefer not to say	8

