

Subject:

FW: WA/2023/00294; Knowle Lane, Cranleigh

Dear Rachel,

Thank you for consulting the Housing Enabling team on this application for 162 new dwellings at Knowle Lane, Cranleigh, including 49 affordable homes.

Please let me know if there has been any pre-application advice on this scheme as I cannot find any record of a PA consultation request in my files, as a lot of my advice that follows could have been provided at an earlier stage and an amended application as a result, would have addressed some of the concerns below:

Level of affordable housing on the site

There is a pressing need for more affordable housing in Waverley, as demonstrated in the Waverley Housing Affordability Study 2021.

49 affordable homes out of a total of 162 homes on the site equates to 30.2% affordable housing. However the affordability of these homes (tenure / bed size) will also need to be a strong consideration, in terms of how closely they will meet local housing need and maintain their affordability in response to rises in the cost of living.

Page 7 of the Planning Statement suggests the 'unit mix and type will be determined at the reserved matters stage; albeit that the applicant anticipates and accepts that a tenure plan would be the subject of a planning condition or obligation.' However, my view is that the affordable housing mix and tenure is an 'in-principle' issue. The scheme cannot be properly assessed without this information. It's not appropriate to defer the supply of this information through the submission of a plan after the grant of permission. I'm not aware that any justification has been provided to demonstrate why a mix can't be supplied or why a different mix to that recommended in our SPD can't be provided. This is why I would like to request a full accommodation schedule showing tenure and bed size and types of units (i.e. whether flats or houses), in order to be able to make a decision on whether the affordable housing offer is acceptable (which could impact on your decision as to whether development is acceptable in principle).

Affordable housing mix

AHN1 requires the mix of dwelling types, sizes and tenure split to reflect the type of housing identified in the most up to date evidence of housing need, taking into account the latest government guidance. Our latest needs evidence is the [Waverley Housing Affordability Study 2021](#) which differentiates the recommended bed size mix for rented and affordable home ownership homes

The overwhelming need in Waverley is for rented accommodation to meet the needs of our lowest income households. However, the NPPF now requires 25% of the affordable housing provision on each site to be First Homes, the Government's preferred form of affordable home ownership, with 10% of homes across the whole site to be for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs or specific groups. A First Home is a discounted market sale product sold at a 30% discount and the sale price after discount must be no higher than £250k. In practice, due to high property prices in Waverley, this means that First Homes will

be 1-beds and 2-beds. A requirement for 25% of the affordable homes to be in the form of First Homes would equate to 12 affordable homes, which I have suggested should be in the form of 1 bed units provided that the price after a 30% discount does not exceed £250k.

These changes will be set out in the forthcoming Affordable Housing SPD update, but we are assessing new applications against them now because they are national policy and I have incorporated these requirements into my recommended mix below. A section 106 agreement will be required in order to secure the provision and tenure split of the affordable housing on site. All affordable tenures must meet the definitions set out in the NPPF.

Recommended mix of affordable homes:

	1 bed	2 bed	3 bed	4+ bed	Total
Waverley Housing Affordability Study 2021 recommended Affordable home ownership (First Homes, shared ownership and shared equity) mix	20%	50%	25%	5%	100%
Waverley Housing Affordability Study 2021 recommended Affordable housing (for social and affordable rent) mix	40%	30%	25%	5%	100%
Waverley Housing Affordability Study 2021 recommended mix OVERALL	30	40	25	5	

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

Recommended affordable tenure mix

	First Homes	Shared ownership	Social rent	TOTAL
1 bed	12	0	4	16
2 bed	0	4	14	18
3 bed	0	4	8	12
4 bed	0	0	3	3
TOTAL	12 (25%)	8 (16%)	29 (59%)	49 (100%)

Rent Levels

Our priority for rented housing is for social rents as reflected in our [Affordable Homes Delivery Strategy 2022-25: Build More, Build Better, Build for Life](#), under Action BB2 which states 'delivery of social rent is considered first, in preference to Affordable Rent on all planning applications requiring affordable housing.' Therefore, I have recommended the provision of social rather than affordable rents. Social rent is the most affordable tenure of all, equivalent to around 55% of the local market rent, and there is a pressing need to deliver this tenure to meet the needs of Waverley's lowest income households. Being clear about our expectations from the outset about the rent levels we need creates an even playing field between affordable housing providers. This should be set out clearly in the s.106 agreement.

Management of the affordable homes

The affordable housing should be owned and managed by a housing association or the Council (with nomination rights secured via a nomination agreement if delivered by a housing association). I would encourage the applicant to engage with affordable housing providers and to look to partner with a provider at an early stage so that they can feed into discussions on rent levels, design, future management and whether any additional affordable housing can be provided. VIVID are developing at Leighwood Fields and A2 are developing at West Cranleigh Nurseries, so it may be helpful to speak to them in the first instance, [Housing Development \(waverley.gov.uk\)](http://waverley.gov.uk)

Location of the affordable homes

Affordable homes should be indistinguishable from the market housing on the site in terms of their external appearance, in order to promote a tenure neutral environment. Therefore, I would also like to request a layout plan, showing the location of the affordable units, by bed size and including block plans of flatted units including affordable homes.

Our adopted [Affordable Housing SPD](#) states that *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* (para 70).

Size and design of the affordable homes

Affordable homes in Waverley should meet the [Nationally Described Space Standard](#) (NDSS) in line with Waverley's [Allocation Scheme](#), to make best use of affordable housing stock, our expectation is that 2-bed units should accommodate 4 people, although 2b/3p homes are acceptable for affordable home ownership.

Affordable homes should meet the M4(2) building regs for accessibility as set out in Local Plan policy AHN3.

Unit type proposed	Gross Internal Floor area to meet NDSS
1-bed flat	50sqm (1b2p)
2-bed house	79sqm (2b4p)
3-bed house (2 storeys)	102sqm (3b6p) if rented; if shared ownership, 93sqm is acceptable
4-bed house (3 storeys)	112sqm (4b6p); 121sqm (4b7p); to 130sqm (4b8p)

Parking

The same level of parking provision should be made for the affordable housing as for the private market housing on the site and should meet the [WBC Parking Guidelines](#).

Please come back to me or to Esther if you have any questions about the points above.

Alice

Alice Lean
Housing Strategy and Enabling Manager
Waverley Borough Council
01483 523252

Working hours 9.00-3.00 Mondays, Tuesdays, Wednesdays and Thursdays

If you require assistance while I am away, please contact Esther Lyons, Housing Strategy and Enabling Manager, esther.lyons@waverley.gov.uk 01483 523430 or Andrew Smith, Executive Head of Housing, Andrew.smith@waverley.gov.uk 01483 523096

I work flexibly at Waverley. I'm sending this message when it suits me, but I don't expect you to read, respond to or action it outside of your working hours.