



By email: planningpolicy@waverley.gov.uk

27th January 2021

Dear Sir/Madam,

Re: Waverley Local Plan Part 2 Consultation

Haslemere Community Land Trust Limited (HCLT) is a Community Benefit Society formed in May 2017 for the purpose of holding land in trust for the community of Haslemere. We aim to deliver genuinely affordable housing for Haslemere that will remain affordable in perpetuity. In Haslemere, genuinely affordable is likely to be at discounts of 40-50% below market value.

The supply of affordable housing is a significant issue for Haslemere and Waverley as a whole. The town's affordable housing need is unlikely to be met even if all of the sites proposed for allocation in the Local Plan Part 2 (LPP2) deliver the number of affordable homes that Local Plan Part 1 (LPP1) policy AHN1 requires. For this reason, and assuming insufficient brownfield opportunities arise, HCLT believes that sites proposed for allocation in rural areas should be developed for genuinely affordable housing only.

For the three Haslemere sites proposed for allocation in LPP2 that are central to the town (DS01, DS04, DS07), it is imperative that affordable housing is provided at these most sustainable locations. HCLT would welcome the opportunity to obtain some of these affordable homes in order to offer the homes at genuinely affordable values to local workers and to ensure they remain affordable in perpetuity.

HCLT continues to have meaningful dialogue with landowners and developers who are interested in bringing forward community-led genuinely affordable housing schemes. It is our hope that developments of this type can be brought forward during the life of this Local Plan.

A copy of our detailed comments with supporting evidence is attached.

Yours faithfully

Paul Bagshaw

Chairman
Haslemere Community Land Trust

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Waverley Local Plan Part 2 consultation – Comments

Meeting the affordable housing need

Waverley's Local Plan part 1 policy AHN1 only requires the provision of 30% of homes, on sites of 5 or more in designated rural areas and 11 or more in non-designated rural areas, to be affordable. In Haslemere, much of our new housing is built on small sites which are below these policy thresholds. A further obstacle is that developers frequently cite viability issues as a reason for not providing affordable homes.

The West Surrey Strategic Housing Market Assessment (Waverley Addendum November 2015) suggested a level of 25 affordable homes per year for Haslemere over the life of the Local Plan (2013 – 2032). Even assuming that half of the affordable housing need will be fulfilled through the private rental sector with housing benefit used to supplement rents, approximately 240 affordable homes will be needed through 2032.

To date, two affordable homes have been built in Haslemere and a further 45 are in progress. Based on permissions already granted and assuming all the proposed allocated sites deliver the required number of affordable homes as per policy AHN1, a total of 180 affordable homes¹ would be achieved through to 2032. This is significantly below the suggested target for Haslemere. Waverley have previously stated that all of the homes on the Youth Campus site (DS04) would be affordable, this would provide an additional 28 affordable homes. HCLT suggests that the council makes an explicit statement that "all of the homes on the Youth Campus development will be affordable homes" in the site allocation narrative for this site on page 137 of LPP2.

The Youth Campus site along with two other sites (DS01- Key site, DS07 - Fairground) are central to the town, being within 1km of the station and close to amenities in Wey Hill or the High Street area. These sites are ideal for developments of flats that are suitable for downsizers, those seeking a first home and those needing level or physically adapted accommodation. The HCLT Housing Survey (July 2018) identified such individuals in need of affordable housing and since most of the land for these sites is owned by Waverley Borough Council, HCLT would welcome the opportunity to work with the council in order to acquire affordable homes on these sites. Whilst the site allocation narratives for these sites on pages 133, 137 and 141 mention that "at least 5% of plots should be allocated for Custom and Self Build" there is no mention of the inclusion of affordable housing within these sites. In our opinion, it is imperative that affordable housing is provided on these sites and a statement to that effect should be added to the site allocation narratives.

Allocating sites on protected land

According to LPP2 paragraph 3.28,² the NPPF states that affordable housing exception schemes may be an acceptable form of development in rural areas which includes areas designated as Areas of Outstanding Natural Beauty. LPP2

¹ 30% affordable homes on sites of 10 or more = DS01 Key site- 12, DS02 Barons- 11, DS04 Youth Campus- 12, DS05 Haslemere Prep- 6, DS06 Red Court- 15, DS07 Fairground- 16, DS08 The Od Grove – 5, DS09 National Trust car park- 3. Total= 80
Already built/in progress = Bridge Road- 2, 5-21 Wey Hill- 45, Sturt Farm- 53. Total =100

² LPP2 paragraph 3.28 The NPPF sets out that a number of forms of development may be acceptable within rural areas including:

- Sustainable growth and expansion of all types of business, both through the conversion of existing buildings and well-designed new buildings.
- Proposals to develop and diversify agricultural and other land-based rural businesses
- Sustainable rural tourism and leisure developments which respect the character of the countryside
- Proposals to retain and develop accessible local services and community facilities, such as local shops, places of worship and public houses.
- Essential rural workers' homes
- Developments that would represent the optimal viable use of a heritage asset or would secure the future of heritage assets
- Proposals to re-use redundant or disused buildings (with the added test for housing developments that there would need to be an enhancement to the immediate setting)
- A dwelling of exceptional quality
- Mineral extraction
- Infrastructure and utilities, including waste facilities



defines rural areas as those areas outside the settlement boundary, irrespective of whether the land is green belt or countryside beyond the green belt.³ HCLT has held discussions with landowners and/or developers of sites within Haslemere which would meet the criteria for an affordable housing exception site. Such a site would contribute to the housing target as well as providing the much needed genuinely affordable housing.

The Red Court site (DS06) is a greenfield site within the countryside beyond the green belt. It would therefore meet Waverley's definition of a designated rural site if it were outside the settlement boundary. However, Waverley is proposing its inclusion within the settlement boundary since it is a "proposed allocation in Local Plan part 2".⁴ HCLT object to the inclusion of the Red Court site within the settlement boundary. This site is on designated land and is proposed for a development of market homes with only 30% being affordable homes. Such a development would not meet the NPPF criteria for acceptable developments on rural land. However, by allocating the site and including it within the settlement boundary, WBC are circumventing the NPPF policy for this site.

Any development of this site should be in accordance with the NPPF and particularly LPP1 policy RE1 Countryside beyond the green belt, LPP2 policy DM15 Development in rural areas and the Haslemere Neighbourhood Plan policies. Developing this site solely for affordable homes to meet identified local need would accord with these requirements if brownfield sites have failed to deliver sufficient affordable housing.

Two further sites outside the settlement boundary and on designated land are proposed for allocation – DS08 The Old Grove (AONB, AGLV) and DS09 National Trust car park (AONB not subject to policy). These are both brownfield sites, however the National Trust car park does not have buildings so development for affordable housing may be the only option that accords with the NPPF.

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- Affordable housing exception schemes
 - Extension or alteration of a building, including development which would involve the subdivision of an existing residential dwelling.

³ LPP2 paragraph 3.32

⁴ P.39 Waverley Settlement Boundaries Topic Paper (November 2020)