## **Examination of Woking Site Allocations Development Plan Document**

# Matter 1: Is the SADPD legally compliant, have the relevant procedural requirements been met, and has the Duty to Co-operate (DtC) been discharged?

Statement from Councillor John Bond - Reference "Bond\_J" (REP/143)

### The Evidence Base

There was no solid evidence base for this SADPD.

When it was prepared the only completed evidence available was four years out of date. The SHLAA 2014 was the only fully researched and finalised evidence base at the time this SADPD came to Council.

When this document was presented to Councillors on  $18^{th}$  October 2018, the relevant evidence base (SHLAA 2017) was not available or even complete. When I questioned this, on October  $22^{nd}$  2018, the Head of Planning Policy advised me by email that "the SHLAA is yet to be finalised and will be published as soon as possible" - it was only finally provided to me on November  $2^{nd}$ .

#### The Decision Process

At the Council meeting in October 2018, Councillors were required to decide whether the SADPD was suitable and should be approved so that it could be taken forward for the Regulation 19 Consultation.

At no time were they made aware that it was not based on a completed and sound evidence base - and that evidence base did not yet exist. Councillors had to assume that the work had been rigorously done and was fully and accurately completed – and had to vote on that basis.

If the relevant evidence base had been available it would have been possible for councillors to ask a series of questions. Some examples are: why were the dwellings under-estimated for sites already in planning (eg Broadoaks and Sheerwater); why was the number of small sites significantly reduced; why was Green Belt land needed for 945 dwellings when the housing deficit was only 162 dwellings after small sites – and why were a number of important major sites completely omitted (eg Victoria Square and Woking Football Club).

Any one of these questions could have undermined the SADPD and led to its rejection or to significant revisions, but this process was not available to Woking Councillors. Even the least significant of those revisions would have made it clear that there was absolutely no need to destroy Green Belt land.

The forecasted deficit of 162 dwellings never really existed and the large number of recent applications for new dwellings in Woking during this year means that the forecasts in the SADPD are considerably understated.

It should also be noted that revision documents were presented to Councillors during the Council meeting on October 18<sup>th</sup> 2018. These documents made significant changes to the Regulation 19 Consultation papers, but there was no opportunity to properly view, consider

or discuss these documents. Any request for such actions would have meant delays to the whole Consultation, which was clearly not considered to be acceptable.

It seems clear that the SADPD was rushed thorough prematurely and without due process. It must be assumed that it was felt necessary to short cut the required and formal procedures in order to force though the required result quickly – which did not allow thorough examination.

## **Consultation**

A particular and very time consuming aspect of the consultation on this SADPD has been asking residents of Woking to decide which Green Belt sites must be used for housing. This has been the theme since 2009 when it was decided to incorporate Green Belt land as a necessary part of the Core Strategy.

During that period a number of Green Belt sites were suggested and were all immediately rejected by the residents who lived near to the land. There were protests by thousands of residents against every site proposed, including almost 2,500 names on a petition in 2013 objecting to the current proposals.

All of the suggested sites were based on the assumption that Green Belt land must be used, so residents needed to decide which Green Belt land was preferred. This approach meant that residents in one ward were put into direct opposition to residents in a different ward – which led to confrontation, not consultation.

## **Alternatives**

In preparing the SADPD, it was felt necessary to obtain professional advice on Green Belt land which would be used for housing. The study by Peter Brett Associates cost over £60,000 but only looked at possible Green Belt sites as an alternative to urban sites.

Despite the fact that this expenditure was felt necessary, there has never been a similar independent professional study to look at alternative brown field sites in the Borough. Given the high level of disquiet and protests by residents throughout the Borough, it is highly surprising that a study of this type was not felt necessary. It would seem vital to rigorously explore all alternatives to destroying Green Belt land, but this has never been done.