

Examination of Woking Site Allocations Development Plan Document

Matter 3: Is the SADPD's approach to allocations and safeguarded land in the Green Belt (GB) justified and consistent with national policy?

Statement from Councillor John Bond – Reference “Bond_J” (REP/143)

Land Requirement

The need to use Green Belt land can only be justified by “very special circumstances” and there must be “exceptional circumstances to alter a Green Belt boundary”.

The final deficit shown on the SHLAA 2018 housing requirement table is only 162 dwellings after small sites are taken into account. This figure is now the sole justification for altering the Green Belt boundary to allow 945 dwellings – and there are a number of discrepancies which must be explained to even justify the figure of 162.

Questionable Forecasts

As previously stated, the SHLAA 2009 gives a long term forecast of available housing for 11-15 years of 1,728, but the equivalent SHLAA 2010 long term forecast suddenly dropped to 840 – which became the sole justification for a need to use Green Belt land for housing.

The allocation of Green Belt land for housing has been maintained every year since, despite the fact that the forecast availability of 840 has been shown to be a massive under-estimate; the SHLAA 2017 forecast for the same period (6 years from 2022) is now 1,553 – the original forecast was almost half as much as the real housing availability.

We now know that the long term forecast made in 2010 was substantially incorrect, but a similar depressed long term forecast has been made each year since. This is the core reason for considering Green Belt land but still only provides a deficit of some 162 dwellings, even though the last verifiable long term forecast exceeds the original figure by more than 700.

Small Sites

Finally it should also be noted that the original SHLAA 2010 forecasts did not include any small sites. In 2009 there was an estimate of 384 small sites during the forward period, but small sites were not included at all in the SHLAA 2010 forecasts.

In the SHLAA 2018 the small sites total is again very low at 200 for the whole period. If the total was 384 even that low figure would have removed the deficit of 162, but in fact the table notes state that it should be 40 per year - which gives a total of 600, not 200. The deficit of 162 because of a forecasted 200 small sites rather than 384 or 600, therefore seems highly debatable and without real substance.

It should also be noted that the figure of 40 per year (600 in the total period), would have removed any justification for the initial inclusion of Green Belt sites in 2010. Even with a low long range forecast of 840 in 2010, a small site figure of 600 would have completely removed the deficit of 550 houses on Green Belt land. The justification for destroying Green Belt land never actually existed.

SHLAA 2018

As the latest SHLAA figures were not available when the Regulation 19 Consultation was proposed to Councillors in October 2018, it was not possible to question the allocation figures. There are however a number of plans which were known at the time, but do not appear fully – or at all – in the SHLAA 2018. Any one of these discrepancies would remove the need for housing on Green Belt land and the combined total makes it clear that there is absolutely no need - now or in the future - to destroy this land.

This is particularly relevant now given the realisation that we have a climate change emergency – which has recently been fully acknowledged by two strong motions at Woking Council.

Specific examples of allocations which need to be questioned are:

a) Broadoaks

The original application is included in the SADPD, but an additional 179 dwellings was known but not included. The plans were submitted in April 2018, but were not agreed until February 2019 after the SHLAA was finalised.

Even this small number would have been sufficient to remove the housing deficit which was used to justify removing Green Belt land for 945 houses.

b) Victoria Square

This development includes some 470 apartments and is due to be completed in 2020. It is a very well known development which is funded by Woking Council, but it is not at all clear whether it is included in the SADPD. On page 360 there is a list of sites including Victoria Square plus a comment saying “These sites have been deleted from the Site Allocations DPD”.

c) Woking Football Club

The current plans are for more than 1,000 homes, but only 40 are included in the consultation.

d) Victoria Arch

The recent news that there will be 3,000 extra homes in this area could not have been included in the SADPD, but it is highly relevant and indicates the difficulty in forecasting future housing. As it is completely new and equates to over 10 years of the housing needs, it clearly removes the need for any further consideration of destroying Green Belt land.

Current Situation

It is highly questionable whether there was ever a need to consider removing Green Belt land in Woking for housing and the latest planned developments in Woking now make it obvious that this is unnecessary.

There have been massive protests by residents in all parts of the Borough since 2013 about the continued insistence on removing Green Belt land. Even though the formal justification is now down to a very small number of dwellings, it seems that this directive is so strong that this is still being used to destroy sufficient Green Belt land for almost 1,000 dwellings.

Given these recent plans and the massive resistance to any further destruction of Green Belt land in the Borough, it would seem important to now reassess the situation and create a

robust SHLAA which includes all the latest developments, properly considers small sites and makes realistic long term forecasts.

This should provide a clear and sustainable strategy which will not destroy the Green Belt, will not create unacceptably high density developments and will still provide ample and diverse housing to accommodate all future Woking residents.