



Pyrford Neighbourhood Forum
c/o Geoff Geaves
135 Lovelace Drive
Pyrford, Woking
Surrey, GU22 8RZ

12 December 2018

Planning Policy Team
Woking Borough Council
Civic Offices
Gloucester Square
Woking
Surrey GU21 6YL

Dear Sirs

RE: Site Allocations Development Plan Document - Regulation 19 Consultation
Response from Pyrford Neighbourhood Forum

The Pyrford Neighbourhood Forum would like to submit a formal Regulation 19 response to the Site Allocations Development Planning Document (DPD), and accompanying documents, as published for the Regulation 19 consultation running from Monday 5th November to 5pm on Monday 17th December.

We note that proposals for the Regulation 18 consultation in June-July 2015 have been restructured and that the Pyrford sites, GB12 and GB13, in the nomenclature of Regulation 18 proposals, have now been removed from the current Regulation 19 proposals.

As lay-people the Forum cannot comment on the validity of the process WBC are following but we believe this Regulation 19 DPD to be a significant improvement on Regulation 18 proposals. Current Regulation 19 DPD proposals recognise the validity of our objections at the preliminary Regulation 18 consultation held in 2015. Namely that:

1. Process for withdrawing sites from Green Belt was flawed.

WBC commissioned the Peter Brett Associates Green Belt Review to identify land that could reasonably be taken out of Green Belt for development. After considering both sites in Pyrford one site (behind Aviary Road) was clearly rejected as inappropriate for development and the other was ranked for inclusion when, if the heritage value had been properly assessed, it should also have been rejected.

2. Process for Selecting Sites for Development was flawed

In the Regulation 18 consultation, both Pyrford sites were selected as sites safeguarded for development after 2027. This was despite the recommendation of WBC consultants that



one site should be kept in Green Belt and without an updated Boroughwide Landscape Character Assessment. If the latter had been available there is no doubt the second Pyrford site would not have been selected for inclusion in proposals.

3. Safeguarded Development after 2027 over-provided.

Our understanding is that 'safeguarding' is an appropriate way to mitigate against plans not maturing as expected and to provide a future reserve for possible housing needs. There is no legal requirement to do so but it is encouraged. However, land for approximately 1200 dwellings was proposed and this was an excessively high proportion of all the land required.

Overprovision of sites safeguarded for development after 2027 meant GB12 and GB13 were selected for proposals contained in the Regulation 18 DPD. Whilst the process for selecting sites was clearly laid out in the DPD, tracking through the process to the conclusions drawn was difficult and beset with anomalies that were unexplained. For example, GB12 was consistently evaluated as unsuitable in the Green Belt Review that is the basis for including GB12 and GB13 in the DPD, until at the end it is recommended on grounds of availability. Similarly GB13 was consistently judged unsuitable in the Green Belt Review and was not recommended as an area to take out of the Green Belt. However, it suddenly reappeared 18 months after the Green Belt Review was delivered and on the eve of the DPD publication. Such decisions were inadequately justified and can only be described as anomalies of selection.

4. Impact of development on Pyrford sites is very damaging.

The Pyrford sites are open farmland, actively farmed with a variety of crops. In the last two years the value and productivity has increased significantly. In addition the site north of Upshot Lane includes the high spot on the Pyrford Escarpment that offers uninterrupted views across Ripley to the Surrey Hills.

Development of these sites will ruin a key area of Pyrford and blight views out from the Pyrford Escarpment and Rising Ground of Landscape Importance (as recognised in the Woking BC 1999 proposals). In addition houses on the high ground above St Nicholas Church will disturb the setting of what is an important conservation site around the Grade 1 listed church.

Our neighbouring Forum Area, West Byfleet is scheduled to lose a substantial amount of remaining Green Belt by 2027 with no viable SANG provision and the retention of Green Belt in Pyrford is essential to provide for green space as required by the NPPF.

5. The Infrastructure is Inadequate to Support Proposed Development

The Pyrford sites are bounded by narrow 'B' roads (B367 and Pyrford Common Road) that extend into the notoriously busy B382/A245 between Old Woking in one direction and Byfleet in the other. These roads are all currently very congested commuter 'rat runs' in the morning and evening, represent main routes for accessing Woking and West Byfleet mainline stations and are also unavoidable when delivering and collecting schoolchildren twice a day.



Against this background development plans for West Byfleet will simply exacerbate the situation.

In addition, there are grave concerns about the ability of medical and bus services to support additional housing in the area.

In conclusion, then, Pyrford Neighbourhood Forum see the removal of sites GB12 and GB13 from the Regulation 18 proposals as a very positive step that improves the viability of the Regulation 19 proposals and renders the DPD more robust. In doing so the revised plan preserves Pyrford's heritage, protects valuable farm land and above all preserves the unique character and setting of Pyrford that is enjoyed by so many from across the Borough and beyond.

Finally, we reserve the right to appear at the Examination in Public against the late appearance of changes to current proposals that impact the unique character and setting of our community in Pyrford.

Yours faithfully

Geoff Geaves

Geoff Geaves, Chairman, Pyrford Neighbourhood Forum

Mobile:07789-654761