

## MATTER 9: SPATIAL STRATEGY, GREEN BELT AND COUNTRYSIDE PROTECTION

### Q9.2 Having regard to the need for housing, does the plan direct it strategically to the right places? Relevant aspects are:

- **Green Belt and landscape impact**

1. The question posed immediately invites the issues of (a) whether there are alternative locations which could suitably accommodate the housing instead of one or more allocations without such Green Belt or landscape impacts, or (b) whether land releases should be less than that needed to meet the all Objectively Assessed Need (OAN) for housing in the Borough. Both issues would need to be addressed if a strategic location proposed by the Council is shown not to be the 'right place'. Save Hogs Back does not consider that the Green Belt and landscape impacts of development at Blackwell Farm make this strategically the right place for major urban development. It is not our task to recommend alternative sites. However, we can comment on the Council's approach to OAN. OAN does not necessarily have to be satisfied in full under the NPPF. The weight to be given to each interest is a matter of judgement.

2. For example, the Inspector for the Reigate & Banstead Core Strategy (report 31 January 2014) identified an OAN of 600-640 dwellings per annum and decided to release sufficient land for the supply of 460dpa, 23-28% short of OAN. The single reason for this was impact on the Green Belt. This decision also involved releasing land for 1,400 dwellings from within the Green Belt. The Inspector was satisfied that there was "*compelling evidence that the Council has done all it can at present to meet its housing needs*" (paragraph 68), involving two urban extensions, and therefore agreed that it did not have to meet its full OAN.

3. Similarly, the Inspector for the Hastings Planning Strategy Local Plan (report 21 October 2013) identified an OAN of 404dpa and decided to release sufficient land for the supply of 214dpa, 47% short of OAN. This reflected the fairly tight local authority boundary around Hastings and major Area of Outstanding Natural Beauty and wildlife constraints on new allocations. The Inspector recognised the OAN but concluded: "*In view, however, of the importance of the environmental assets which give the Borough its unique character and which should be protected, the Planning Strategy provides for as much housing as is consistent with the policies set out in the Framework, and in the right places. In this respect, it is sound*" (paragraph 81).

4. The Guildford Submission Plan identifies the correct basis for balancing housing and competing interests, which is to "*ensure that our Local Plan meets the full, objectively assessed needs for market and affordable homes in the housing market area, as far as is consistent with the policies set out in the NPPF*" (paragraph 2.19). However, NPPF policies have been selectively applied, with the Plan making the assumption that all the OAN must be supplied and carrying out no analysis of competing interests which might affect this. The predisposition to meet the Borough's OAN for housing is set out in the Council Leader's Foreword and suffuses the Plan thereafter (e.g. Policies S2 and H1). At no point is any question posed whether meeting the full OAN for housing is the most appropriate policy or whether it is consistent with other NPPF policies. The Plan has simply decided that

Guildford Local Plan Examination  
Representor: Save Hog's Back

whatever Green Belt land is needed to meet OAN will be released (after a sequential approach to prioritise the release of some types of land for housing over others). This approach falls entirely short of the requirements of NPPF paragraph 14. The Plan is unsound because it is not consistent with Government policy.

5. Save Hog's Back fully supports the Statement of Compton Parish Council on Qs 9.2 and 9.5.

## MATTER 11: SITE ALLOCATIONS – A26 BLACKWELL FARM

### Q11.15 Can access to this site from the south be successfully achieved from the A3/A31 without significant detriment to the landscape?

6. No. There are multiple failings in the proposal. It will not be successful. The Submission Plan is substantially misleading. It is unsound because it would not be effective (undeliverable), is inconsistent with national policy, and is not justified in the AONB.

7. Our responses to Qs 11.15 and 11.16 summarise a number of points previously raised in response to the June 2016 and June 2017 Regulation 19 consultations, but expand them in important respects in most cases using information which was not available in June 2017. Additionally, we fully supports the Statement of Compton Parish Council on Qs 11.16 and 11.17.

#### *Why link to the A31?*

8. A link to the A31 would make sense for people wishing to access or leave Blackwell Farm in the westerly direction of Farnham and Aldershot. However, it is a poor access route for the majority of people who will want access to and from Guildford (east) or the A3/M25 (north). Access to the A3 northbound would only be practicable through Guildford centre. The Regulation 19 Plan in June 2016 proposed *“Primary vehicular access to the site allocation will be via the existing or a realigned junction of the A31 and the Down Place access road”*.

9. The Council said in the June 2016 Regulation 19 Plan it was taking the opportunity of Blackwell Farm to provide a new *“through vehicular link... between the A31 Farnham Road and Egerton Road to provide a new route to the Surrey Research Park, the University of Surrey’s Manor Park campus and the Royal Surrey County Hospital”* (RSCH). This raises the prospect of rat-running through Blackwell Farm to avoid the heavy congestion on the A3 (which will remain after any widening: see below).

10. This reason, and doubts about the capacity of a signalised junction (see below), concern the Highways Authority, and the Council too has been trying to play down the significance of the link road. The Submission Plan newly refers in Policy A26 Requirement 3 (emphasis added) to *“A through vehicular link which will be controlled...”*; the link road is no longer the ‘Primary’ access route; and the aim is only *“to provide a new route for employees and emergency services.... as well as a choice of vehicular access for the new residents/occupiers”*. We understand from extensive enquiries that ‘will be controlled’ means that the intention is to introduce Automatic Number Plate Recognition (ANPR) so that only vehicles which ‘need’ to be on the link can use it without repercussions.

11. Using ANPR to regulate who may or may not use the public highway in principle (rather than paying for it like the London Congestion Charge and the Dartford Crossing) appears to be unlawful. Certainly DfT, MHCLG and Home Office have not identified its use to deter rat-running other than on private land (e.g. Addenbrooke’s Hospital, Cambridge). In principle, therefore, ANPR can only operate on private highways. The Submission Local

Plan is effectively advocating the extraordinary idea that a major urban extension to Guildford should only be accessible on a private road (or at least a road with a private stretch). This could be blocked off at the whim of the landowner (University of Surrey). This they have already demonstrated a willingness to do on other roads nearby when the University hosted the Lacrosse World Cup in July 2017, closing access to the park-and-ride from Egerton Road without consulting the Highways Authority. Private roads to an urban area would be wholly unacceptable.

12. Even if ANPR was introduced, its administration would immediately become a nightmare. Acceptable vehicles would have to be registered and all others assumed intruders unless (somehow) justified. This is wholly unrealistic for an urban extension where there will be large numbers of vehicles legitimately entering the area which have missed out on prior registration. If there was a barrier system to keep out unwanted vehicles, the arrangement would break down within minutes. If there was a system of fines for unauthorised access – presumably with the police supporting its operation – the system would be overwhelmed and break down within a few weeks. It is fairly obvious that an ANPR scheme would soon be abandoned. This would not be of concern to the landowner, but it would wholly reverse the basis on which the link road was agreed and Blackwell Farm allocated in the first place. A link to the A31 as proposed in the Plan will fail.

*Will the link road harm the landscape?*

13. The Submission Plan has proposed a narrow corridor for the link road up the north slope of the Hog's Back. This is within the Surrey Hills Area of Outstanding Beauty, and the Hog's Back is one of the most iconic landscape features of all AONBs and world famous. The Council's response to the Inspector's Initial Q8 states *"it is proposed to use the existing access road, Down Place, located in land parcel H1. The road is however currently narrow and would therefore require upgrading. This could result in a new road parallel to the existing on the up-hill side of the road"* (paragraph 8.70).

14. The notion of widening the existing Down Place is frankly absurd, as this would take out the wonderful mature trees on one or both sides of the lane, damaging the landscape and reducing any screening benefit otherwise on offer. We have therefore assumed that the University of Surrey's 'Feasible Option', with a new road on higher ground to the south of Down Place, is the working proposition. This was provided informally to local residents in August 2017 as part of a package of new road layout proposals, and is attached as Appendix 1. Like the Submission Plan, this assumes a sharp bend at the foot of the slope, breaking through Down Place. Artington, Compton, Wanborough and Worplesdon Parish Councils commissioned an independent landscape and visual appraisal of this access road. Issued by Land Management Services in January 2018, the study concludes that:

*"This LVA concludes that there would be significant impacts and effects on both landscape character and visual amenity. The road would be prominent in views to and from the Hog's Back from public rights of way, permissive paths and the A31. Car lights would impact significantly at night introducing lighting to the currently unlit slopes to the AONB. This LVA concludes that if permanent street lighting were to be introduced this would have a major adverse effect on character and tranquillity...."*

*The proposed access road would conflict with policy at a national, regional, local and AONB level. The access road would fail to conserve and enhance the landscape qualities and scenic beauty associated with the nationally protected Surrey Hills AONB, as required by Paragraph 115 of the NPPF and policies in both the current and emerging Guildford Borough Local Plans. The proposal would conflict with Land Use and Transport policies in the AONB Management Plan which seeks to protect and enhance and minimise impacts on the landscape of both the AONB itself and the setting to the AONB."*

15. We consider the Feasible Option unacceptable in landscape terms, accompanied by noise, pollution and the eye-catching effect of moving vehicles. Blackwell Farm is the only major housing development directly impacting the AONB. 'Exceptional circumstances' for it in terms of NPPF paragraph 116 (for major development) have not been demonstrated. They have not even been claimed by the Council. Given that a major urban development of 1,100 hundred homes at Flexford and Normandy, outside the AONB, was removed by the Council after being proposed at Regulation 19 stage in June 2016, the Council cannot claim that alternatives less damaging to the AONB do not exist.

16. There is also a significant difference between the University's 'Feasible Option' and what would happen in reality. The Submission Plan is seriously misleading.

(i) The maximum desirable gradient for the road according to the Design Manual for Roads and Bridges is 6.0%. The existing gradient approaching the A31 is 6.5%. Traffic queuing to the traffic lights on the A31 junction would be on a steep uphill gradient which is a hazard that would be very difficult to avoid (the *Strategic Highway Assessment Report*, June 2016, Table 4.11 forecast a 35 second delay on this junction, meaning distinct tailbacks on the hill). The Highways Authority would insist on efforts to reduce the gradient of the road which have not been recognised in the Submission Plan. A shallower gradient would spread the road much further across the north flank of the Hog's Back and would be still less screened by the Down Place trees. There may still be a need for a crawler lane, with added landscape impact.

(ii) Significant earthworks would be needed to accommodate a wide road passing at an angle down a steep slope. This would cut into the chalk (inevitably resulting in a scar visible for miles) and building up the downslope side of the road. These would have a significant landscape impact in this protected area.

(iii) The sharp road bend towards the bottom of the slope, similar to that on the existing Down Place, would be wholly unacceptable in highways terms for an access road to a major urban extension. The University has already introduced a 10mph speed limit on Down Place due to the 'hazard' of this bend. As proposed the new road would be a significant hazard for motorists. Overcoming this would take the road through a wider sweep, greatly increasing landscape damage.

(iv) The Submission Plan is silent about the street lighting which our transport consultant advises would probably be needed along the length of the link road: this would damage the

experience of the AONB and AGLV at night and introduce poles cluttering the protected landscape.

17. The link road cannot be built as indicated in the Submission Plan. Land Management Services comment "*A significantly larger land take than that shown on the feasible option would be required in order to create a safe and viable highway. It is anticipated that extensive cut and fill works would be required to create suitable gradients. The land take and consequent impact on landscape character and visual amenity would, therefore, be substantially greater than suggested by the feasible option alignment*". Taken together we reject the vague claim by the Council in response to the Inspector's Initial Q8 that "*Whilst it does also run through both AONB and AGLV, the impact that the upgrading would have on the landscape can be mitigated through the retention and enhancement of the tree cover already present along its length*" (paragraph 8.70). There is no policy presumption that a local major development (a road) should override the national interest in protecting AONB.

*Would the junction with the A31 work?*

18. An 'Initial Junction Arrangement' issued by the University of Surrey (Appendix 1) shows that the existing Down Place bridge and access will not be widened. Instead a new junction with the A31 would include a new bridge over the slip-road onto the A3 (precluding drivers joining the A3 northbound). Infrastructure Project LRN3 identifies the cost of the junction as "*£5m developer funded*". Our independent transport consultant advises that the cost of the junction and bridge would exceed £10m. The junction could physically be achieved but not for the stated cost.

19. The Submission Plan states that the junction "*will be signalised*" (Policy A26 Infrastructure Requirement 1). The Council has not carried out the assessment work and design layouts to demonstrate that a signalised junction could deal with the volume of traffic the Council expects to use it. There are two major problems:

(i) Traffic from Blackwell Farm exiting this junction is estimated by Surrey CC to be 415 vehicles per hour over the AM peak three hours. Much of this traffic will wish to turn left for Guildford and the north. However, the bumper to bumper congestion on the A31 at this point during the morning peak, not taken into account in the model, will preclude a rapid rate of traffic egress in that direction. A queue will build up on the steep north side of the Hog's Back and the delay be substantially greater than 35 seconds (paragraph 10(i) above).

(ii) Our transport consultant has carried out a preliminary assessment of the junction (in Appendix 3 submitted with our response to the June 2016 Regulation 19 consultation). This shows that, based on the Design Manual for Roads and Bridges TD42/95, Figure 2.2, a roundabout should clearly be preferred. This in itself would have major implications for construction due to topography, changes of level and confined space. Those in turn would have landscape and other consequences. A signalised junction would be lit, the Highways Authority advises, having adverse consequences on the currently dark AONB at night, and a roundabout would intensify this problem. Councillors have previously consistently opposed a roundabout on the top of the Hog's Back for landscape reasons (e.g. at the Council

Meeting on 24<sup>th</sup> May 2016), but the likelihood is that this is what will be required in practice. The Submission Plan again understates the true consequences of its proposals.

### **11.16 Where would the traffic impacts occur and how would they be mitigated?**

20. In addition to the impacts on the link road to the A31, there would be traffic impacts from the proposed access on the east side. The Submission Plan is derelict in its duty in being unclear where this significant access route would go or what its effects would be. We have had to rely the University of Surrey's 'Vision and development concept' submitted in response to the June 2017 Regulation 19 consultation. This shows a road through the north of Strawberry Grove, up a hill to join Priestley Way at a T-junction within the existing Surrey Research Park, then up to the busy roundabout giving access to Gill Avenue and thence Egerton Road and the A3.

#### *Capacity of the A3*

21. All parties appreciate that the Blackwell Farm development cannot proceed until the capacity of the A3 through Guildford has been increased. The Road Investment Strategy (RIS1) indicates a Government intention to make such improvements, upon which the allocation is wholly reliant. The likelihood of this happening is massively less than the Council believes. This 'mitigation' is unlikely to happen, at least within the Plan period.

22. Strategic Road Network infrastructure SRN2 covers the A3 upgrade between the A31 and A320 Stoke interchange and associated interchange improvements. This is scheme E31 for 'the next road period' (April 2020 – March 2025). It is budgeted as "*£100-250m Highways England and developer funded*". Widening this road, some of it elevated, in its very tight corridor on the north east flank of the Hogs Back poses remarkable challenges and would come at considerable social cost to its neighbours and environmental damage. The cost would be very substantially more than indicated. (By way of comparison, the imminent M25 Junction 10 with the A3 upgrade alone is planned to cost £250m.<sup>1</sup>) Who would pay for it remains unclear.

23. No final decision has been taken to proceed with SRN2 (or any other RIS1 schemes proposed for the RIS2 period). Highways England in *Strategic Road Network Initial Report* (December 2017) explains of these "*The government have asked us to identify and design solutions for 15 locations announced in the first Road Investment Strategy, with the aim that they could be ready to enter the planning process and construction in the next road period if an appropriate solution could be identified which offers good value for money... Work will continue on the design of these schemes during the remainder of this road period, providing they continue to demonstrate value for money, deliverability and affordability" (section 5.3.4, emphasis added). We question whether the A3 widening will satisfy these criteria: the extraordinary cost of so difficult a development is unlikely to provide good value for public money to unlock housing development. There are also highly significant*

---

<sup>1</sup> Surrey Infrastructure Plan, November 2017, page 114 (in Part 3), from <https://www.surreycc.gov.uk/environment-housing-and-planning/development-in-surrey/surrey-future/surrey-infrastructure-study>

disadvantages to consider in the decision, for the environment (e.g. visual, noise, pollution, carbon emissions), social well-being (e.g. disturbance, overlooking, health) and severance (impeding movement, increasing safety concerns at underpasses and discouraging walking and cycling).

24. Highways England will be mindful of the effects of widening the A3 between the A31 and A320. Surrey County Council's *Strategic Highway Assessment Report* June 2016 (SHAR) shows that there will be negligible benefit for motorists (Table 4.5). The SHAR Scenario 5 (p24), with the A3 widened, shows that the northbound carriageway on this section would still have a Ratio of Flow to Capacity of 1.10. This is averaged between 07.00 and 10.00, so capacity would exceed 110% in the peak hour. The Level of Service would remain rock-bottom at 'F' (*"Forced or breakdown of flow. Every vehicle moves in lockstep with the vehicle in front of it, with frequent slowing required. Travel time cannot be predicted, with generally more demand than capacity"*). The extra capacity on the A3 would barely assist Blackwell Farm because it would attract new trips (SHAR paragraphs 4.5.9 and 4.8.5): in effect pent-up demand is so great around Guildford that no realistic amount of road building will improve peak journey times. In addition, Table 4.5 shows the extra traffic attracted would cause significant deterioration in the Ratio of Flow to Capacity through Compton village on the B3000 (adding to the AQMA problems there), on the A31 (further crowding the junction with Down Place) and on the A320 and A25. All would remain with a Level of Service fixed at 'E: Unstable flow operating at capacity'. The A3 widening would cost hundreds of millions of pounds with hardly any discernible benefit to users or the economy.

25. The A3 widening delivery date has already been put back from 2023-2027 to 2024-2027 between the first Regulation 19 Plan and the Submission Plan. The Council's own *Topic Paper: Transport* (June 2017), paragraph 5.88, reports that *"Highways England has advised that, if a scheme is approved with funding agreed, construction is unlikely to be start[ed] until 2024 at the earliest, with construction taking 2½ years."* This would mean that the capacity would only become available in 2027 at the earliest. Meanwhile, the Council's housing trajectory as reported in response to the Inspector's Initial Q3 in April 2018 shows at Appendix 1 that the Council expects Blackwell Farm already to have provided 450 houses by March 2027. At this time the A3 would have reduced capacity (in the process of being widened) rather than more. It is fanciful that the Highways England or the Highways Authority would allow this scale of construction at Blackwell Farm before the A3 widening was complete, making Blackwell Farm unable to help meet the housing contribution attributed to it. In reality we have not been able to identify any progress with the A3 scheme at all, so its completion may be put back further (if it happens at all).

*From Blackwell Farm to the A3 interchange and Guildford*

26. The physical proximity of the Blackwell Farm allocation to Guildford disguises the difficulty of access to it (paragraph 20 above). The 1,800 dwellings at Blackwell Farm would generate significant additional traffic into one of the already most congested parts of the network in Guildford. This was outlined in paragraphs 48-50 of our response to the June 2017 Regulation 19 consultation. The SHAR Table 4.12 shows the 10 roads with the largest Ratios of Flow to Capacity in the AM peak hour under Scenario 3 (with all the local highway



mitigation schemes in place but not the RIS1 or RIS2 schemes). Apart from the A3 Guildford Bypass itself (33% over capacity) and the A31 approach to Guildford (18% over capacity), Egerton Road at the RSCH and Tesco roundabout would be 21% over capacity. This is despite the assumed A3 with Egerton Road roundabout improvement (SRN7, about to commence) being in place (paragraph 3.2.3).

27. A significant concern here is that traffic cannot exit the A3 northbound to the Tesco roundabout because of congestion on Egerton Road which backs up on the A3. The SRN7 improvement would raise the capacity of the A3 off-slip but not tackle the root problem. The Council commissioned a *Study of performance of A3 trunk road Interchanges in the Guildford urban area to 2024 under development scenarios* from Mott MacDonald (revised version April 2018), which argued that the tailback to the A3 is caused primarily by congestion on the Egerton Road crossroads 140m west of the Tesco roundabout (which can hold 23 'passenger car units' in a queue before blocking the roundabout). There is a particular lack of capacity for vehicles heading west from the crossroads into Gill Avenue towards the hospital car parks and the Surrey Research Park. This is also the direction towards Blackwell Farm. From a baseline position in 2014, the report modelled the cumulative effects by 2024 of:

- (i) natural background growth in traffic 2014-2017: this was essentially nil (Table 7);
- (ii) natural background growth in traffic 2017-2024, with traffic exiting the A3 northbound at the Tesco roundabout estimated at +4.7% (Figure 17);
- (iii) development completions 2014-2017;
- (iv) development 2017-2024 compliant with the existing development plan;
- (v) development enabled by the Submission Local Plan (by 2024).

All these are taken into account in Table 21, which estimates the performance of the Egerton Road westbound at the crossroads west of the Tesco roundabout.

28. Without any improvements to Egerton Road, Table 21 shows that the scale of traffic backing up into the Tesco roundabout rises to 2024. In the morning peak hour the queue was 26.6pcus in 2014 (i.e. blocking the Tesco roundabout) and would rise to 35.2pcus with the effects of (i) to (v) above by 2024. Table 22 shows that with the road improvements in Mott MacDonald's Appendix D – consulted on in autumn 2017 by the Council (see Appendix 7 to the *Topic paper: Transport*, December 2017), the queuing level would be reduced. The effects of (i) to (v) would lead to a queue length of 16.7pcus in the morning peak. The queuing level back to the Tesco roundabout would now be worse in the evening peak hour than in the morning peak, at 18.5pcus. Then the crossroads would have 94.5% saturation.

29. The Mott MacDonald report covers the impact of traffic growth only to 2024. By then, Blackwell Farm would have seen just 150 dwellings and 3,000m<sup>2</sup> of office space built according to the Submission Plan (and see the report's Table 10 in the Correction Note). In short Mott MacDonald models the impacts when 8.3% of Blackwell Farm's dwellings have been built. At this point the tailbacks to the Tesco roundabout would barely have been resolved as the construction of Blackwell Farm starts up. The spare queuing capacity here before it affects the operation of the roundabout would be just 4.5pcus in 2024 (23 minus 18.5). In the evening peak period the tidal flow of drivers resident at Blackwell Farm would be westbound, homeward. The actual number of vehicles generated by Blackwell Farm and making the journey along Gill Avenue and Egerton Road has been modelled in the SHAR at

paragraphs 4.7.3-5 and Figure 4.3 (wisely assuming no ANPR constraints). This is likely to involve of the order of 342 vehicles in the peak hour travelling west on Egerton Road (which is the number estimated to leave eastbound in the morning peak hour). Of these 8.3% are modelled already, so over 300 extra vehicles will need roadspace (1 every 11-12 seconds). The majority of these will be coming from the Tesco roundabout. The addition of very substantial numbers of vehicles accessing Blackwell Farm would clearly extend the queue greatly and once again swamp the Tesco roundabout and overload the network. The 94.5% saturation of the Egerton Road crossroads could easily rise to over 100%. Egerton Road would be even more congested after Blackwell Farm is built than the road (and network) is now. Blackwell Farm would have devastating congestion effects on Egerton Road. The only possible outcome is that Egerton Road crossroad, the Tesco roundabout, the Cathedral roundabout and the A3 slips would at times break down due to overcapacity usage. There would be no remaining improvements to the road capacity in the area realistically feasible.

30. Since the SHAR was issued in June 2016, a major new secondary school with six form entry has been allocated to Blackwell Farm, which was previously sited elsewhere (Policy A26 Allocation item 9): a school of this size (circa 900 students comprising 180 students in each year group for five school years) would generate a very substantial amount of additional traffic, bringing in about 600 students daily from outside Blackwell Farm, many attracted from Guildford. This can only mean still worse congestion on Egerton Road and the surrounding network.

31. Access to and from Blackwell Farm on the east side will not be feasible for the anticipated volume of traffic generated. We have no doubt that these circumstances meet the criterion in NPPF paragraph 32 that *“Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.”*

#### **11.19 Are there local level exceptional circumstances that justify the release of this site from the Green Belt?**

32. No. The new Green Belt boundary proposed on Blackwell Farm would not be reliably permanent, contrary to NPPF paragraph 85. It would follow a footpath and bridleway. One length would be against a woodland, but part of the proposed western boundary to the site – the new Green Belt boundary – would follow a minor hedge in a dip in the landscape. The existing Green Belt boundary is superior and there is a clear risk from the proposals that Guildford could in future sprawl further west of Blackwell Farm in future. There would be a particular folly in changing the Green Belt boundary here again, contrary to the intentions of the previous Inspector, and then selecting so indefensible a position that it will only encourage the parties to come back yet again for another revision. The Plan is unsound because it is not justified in this respect.

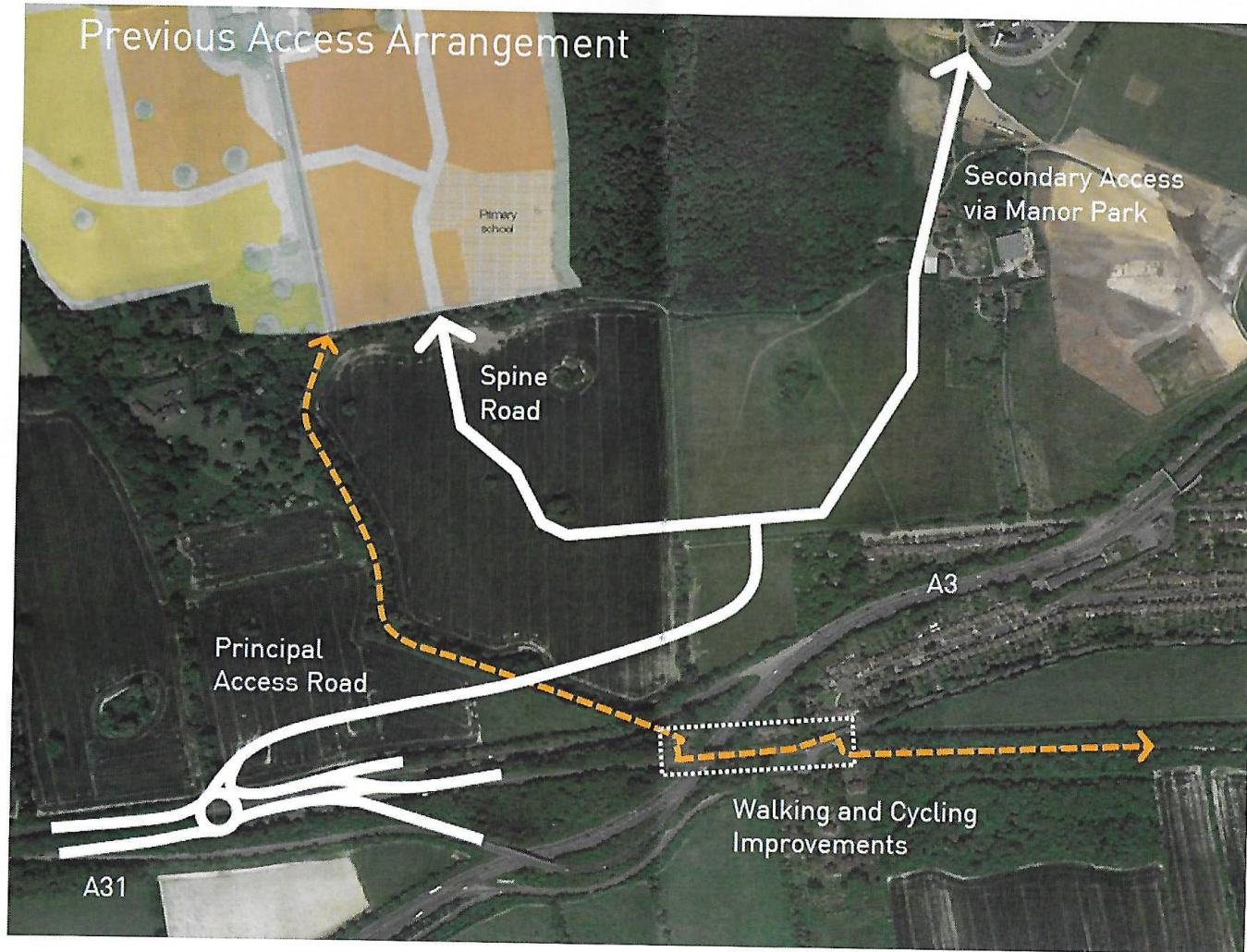
33. Other concerns, including local examples of wider strategic problems, have been presented in response to Q9.2. We are particularly troubled by the proposals for playing fields south of Manor Copse, in effect introducing a suburban public park into this very sensitive Green Belt landscape. The Council's poor judgement on environmental interests is of continuing concern.

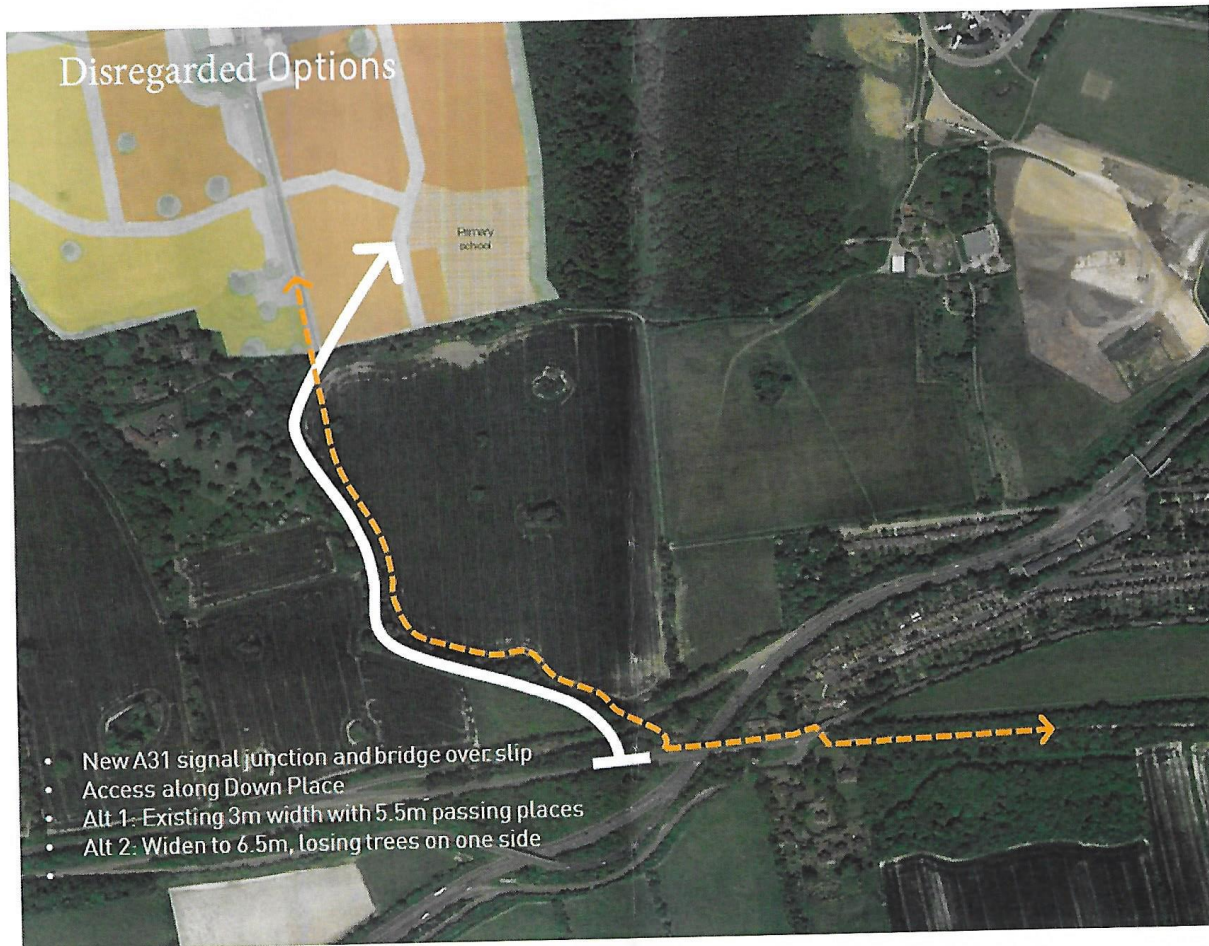
**APPENDIX 1**

**New road layout proposals at Blackwell Farm  
by the University of Surrey  
August 2017**

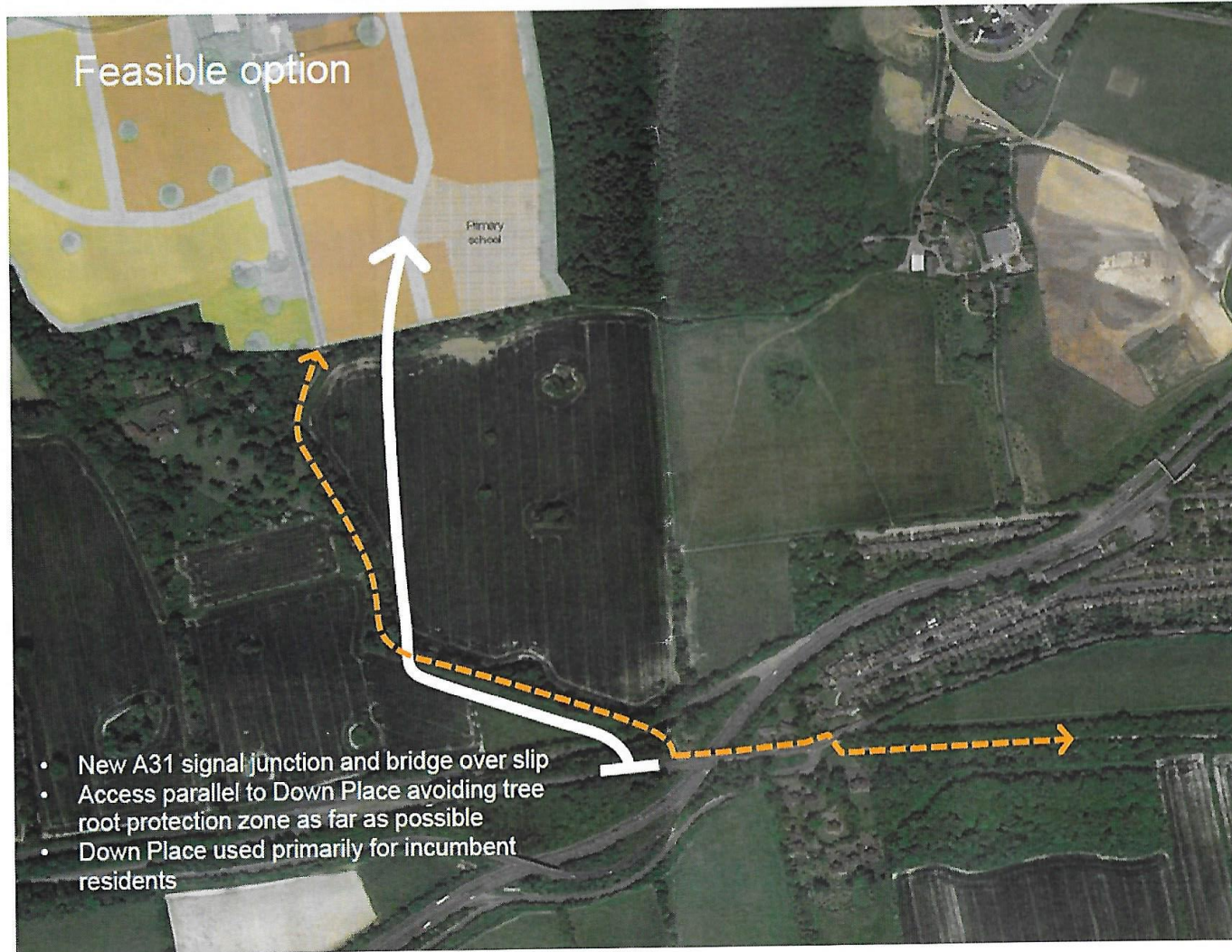




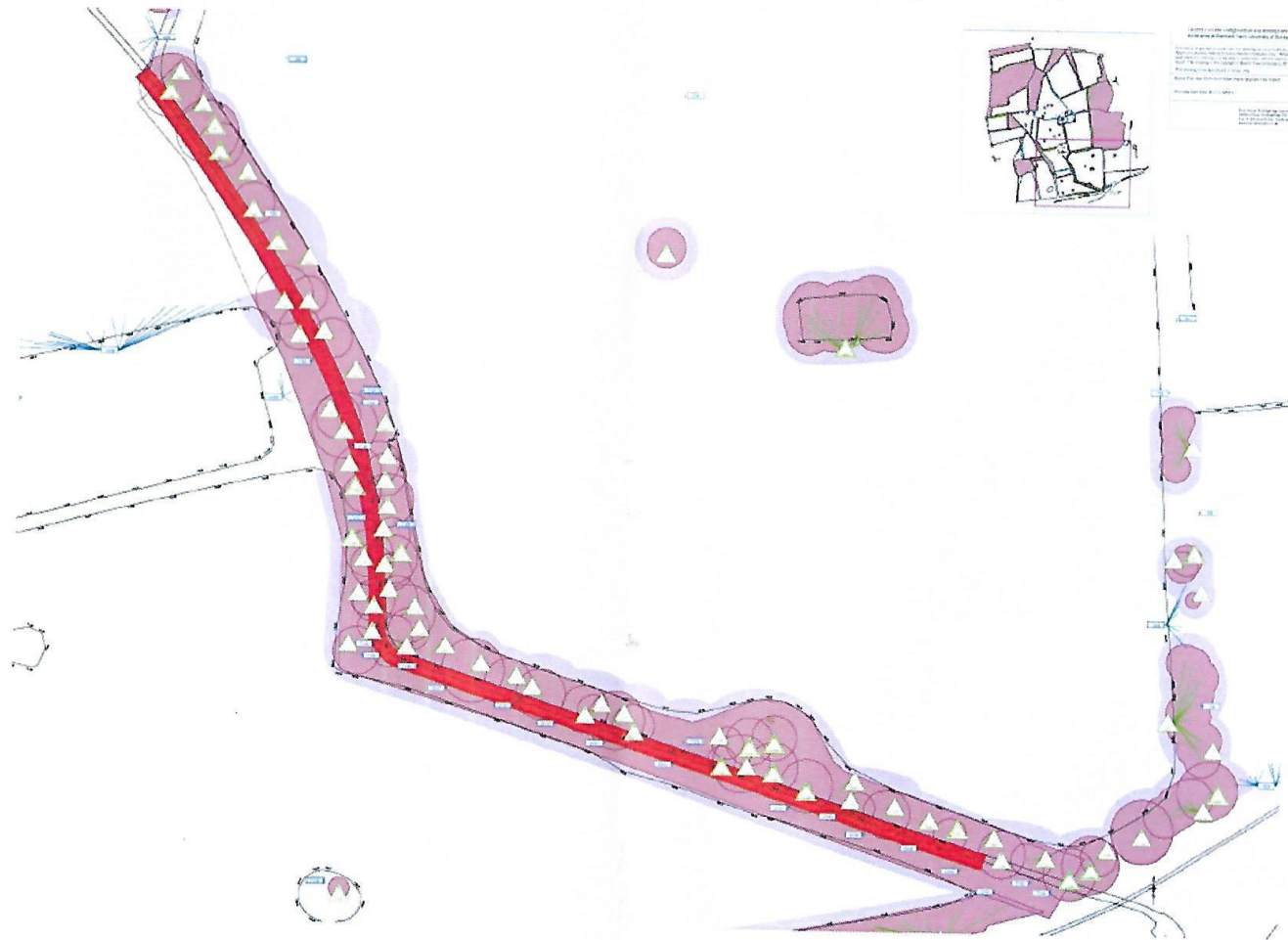








Impact on Route Protection Zone (University does not therefore favour widening Downs Place)





## Initial Junction Arrangement

