

**FAO Gemma Paterson (Case Officer)**

Epsom and Ewell Council  
Planning  
The Old Town Hall  
The Parade  
Epsom  
KT18 5BY

12<sup>th</sup> August 2025

Dear Ms Paterson,

## **Letter of Objection – Planning Application Ref. 25/00846/OUT**

I am writing on behalf of the Jockey Club Racecourses, the landowner of Epsom Downs Racecourse and Epsom Training Grounds, to formally object to planning application reference. 25/00846/OUT, which seeks outline planning permission 'for up to 110 dwellings including affordable homes (all matters reserved except access from Langley Vale Road)' at the site of Farm View, Langley Vale Road, Epsom, Surrey, KT18 6AP.

Jockey Club Racecourses oppose the proposed development at the site adjacent to Epsom Downs Racecourse and Epsom Training Grounds. This letter sets out our operational concerns on the submitted planning application.

### **Impact on Epsom Downs Racecourse**

The Epsom and Ewell Core Strategy (2007) sets out that Epsom Racecourse is 'nationally important'. The racecourse and the local racehorse training industry are an important part of the economy of the Borough, as well as a significant part of its heritage. This is echoed by the Emerging Local Plan which sets out the national significance of the racecourse and training grounds. A recent Economic Impact Report commissioned by the Jockey Club found that horse racing delivers £63,225,000 in value to the surrounding area per annum. The racecourse and training grounds also provide significant community and social benefits that also arise from the facilities. It is clear how important the racecourse and training grounds are to the surrounding area.

The proposed development at Farm View will have a significant adverse impact upon the operations of the horse racing industry within the vicinity of Epsom & Walton Downs. The application site is situated directly adjacent to horse racing training areas and access routes.



*Figure 1: Application site*

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The Jockey Club  
21-27 Lambs Conduit St  
London WC1N 3NL

info@thejockeyclub.co.uk  
+44 (0) 20 7611 1800  
[thejockeyclub.co.uk](http://thejockeyclub.co.uk)

The Training Grounds have experienced a significant reduction in the number of trainers using their facilities over a number of years. This is due to a prolonged decline in the number of operational yards in the surrounding area and the number of horses being trained. The number of horses using the Epsom Gallops has reduced 16% to 143 across the last 14 years, with 10 trainers. When viewed across a wider timescale, in 1970 there were 520 horses in training and 19 trainers.

This presents a significant challenge to the operation of the Training Grounds. This application poses a great risk to the operations of the horse racing industry by jeopardising the safety of horses and riders. This will further disincentivise the use of the Training Grounds by trainers which will cause additional viability concerns for the long-term sustainability of the Training Grounds and the consequent management of the Downs. Given the site is of national importance (as per the Development Plan), provides significant economic benefits and is vital to the heritage of the area, it is imperative that this application is refused in its current form due to the irreversible damage it would cause to the health of the horse racing industry at Epsom & Walton Downs.

### **Equestrian Safety**

According to the Transport Assessment that accompanies the application, a total of 52 vehicular trips will occur in the AM and 50 in the PM peak hours. This represents a considerable increase when compared with the existing road usage. However, the Transport Assessment only conducted a single day survey to 'assess the level of interaction between equestrians and vehicle users' which we do not consider to be a sufficient analysis given the sensitivity and vulnerability of the local horse training operations, and demonstrates a lack of consideration for horses & riders making the journey from local training yards to the Training Grounds.

Also, the assessment has only looked at the number of horse movements within peak hours, which again does not reflect consideration of the horse training programme which typically requires horse movements on the highway between dawn and 1pm.

Furthermore, the survey reviews one junction as opposed to a greater geography which should include a larger section of Langley Vale Road. This will allow the survey to capture the areas where a significant number of equine movements occur.

It is essential that these areas are considered, particularly during the hours of most frequent horse movements. This is because there are significant equestrian safety issues associated with the increased number of vehicular movements, exacerbated due to the specific nature of racehorses which differ from the more docile, domestic horses ridden for amenity hacking. Traffic impact on young racehorses in particular needs greater consideration than shown in the applicants Transport Assessment. The increase in vehicles and lack of consideration for movements of racehorses on the highway increases the risk of harm to the horses and riders and for these reasons the application should be refused.

### **Bridleway 127 (Old London Road/Tattenham Corner Sw across Racecourse)**

Bridleway 127 is situated within the ownership of the Jockey Club Racecourses and connects Ebbisham Lane and Tattenham Corner Train Station. This effective functioning of this Bridleway is key to the operation of the Training Grounds as it provides access for horses entering the land from the north and east to the gallops which are a vital part of the facilities at the Training Grounds that attracts trainers.

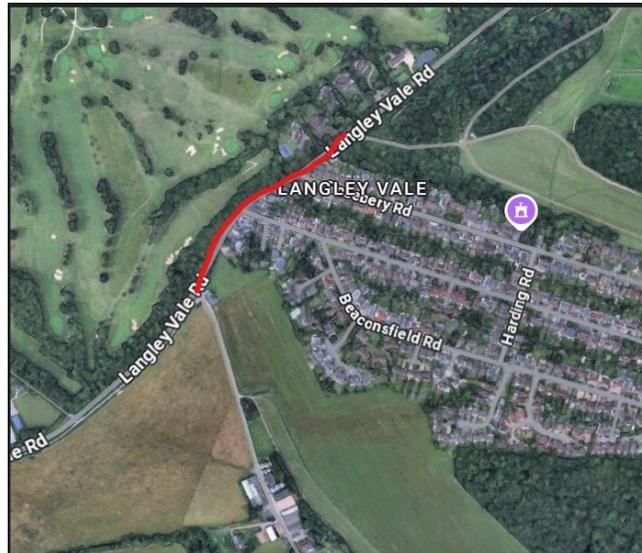
The transport assessment that accompanies the application sets out that 'Route 4' forms a key connection between the application site and Tattenham Corner. This route seeks to utilise Bridleway 127 as part of the connection. There is no assessment of the impact upon racehorses using the Bridleway. We would object to the proposal as it has not considered the impact upon the racehorses.

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In terms of policy, Policy DM7 of the Development Management Policies Document (2015) states that *'new development affecting existing or proposed footpath, cycle and bridleway networks will not be permitted if it results in the loss of, or has a harmful impact on, these networks'*. It is clear that the proposed development will have a harmful impact upon the use of the Bridleway through the increase in pedestrians using the route, and while use of bridleways by pedestrians is of course permitted, the intensification of pedestrian use will cause increased conflict with the established and essential use by race horses, which is vital to the long term sustainability of the Epsom & Walton Downs Training Grounds. The intensification of use by pedestrians will lead to safety issues and as such, the proposal clearly does not accord with this policy and the proposal is in conflict with the Development Plan.

### Highway Improvements

Policy DM7 states *'where new development provides an opportunity to improve existing and proposed networks and such improvements are practical and viable we will seek their delivery as part of the development'*. Jockey Club Racecourses deem there to be a practical improvement that is viable and can be made to the existing highways network, the area of which we have highlighted within Figure 2 below.



**Figure 2: Highway Improvement Location**

At present the only route for horses to access the 5-furlong gallop north of the application site is to walk horses along Langley Vale Road. The horses have to leave the bridleway (bridleway 33) on the eastern side of the road, cross over the highway onto the left-hand side in order to walk north to the next bridleway (north of Langley Vale) before crossing against oncoming traffic back to the eastern side of the road and onto the bridleway.

However, there is an existing footpath along the eastern side of the road which continues all the way up to the bridleway junction north of Langley Vale. Should the Council be minded to approve the application we consider that the equestrian safety concerns could be partly resolved, by upgrading the existing footpath in this location to a bridleway with fencing alongside to further increase equestrian safety. In addition, there are currently no highways warning signs either above or below Langley Vale to warn motorists of potential horses in the road and these should be provided. These highway works are essential for horse and rider safety and without which the application should be refused.

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## Conclusion

In conclusion, Jockey Club Racecourses strongly object to the proposed housing development, sought through planning application reference 25/00846/OUT. The application will have a significant adverse impact upon Epsom & Walton Downs Training Grounds, which are assets of national importance. We have significant concerns regarding the inadequate assessment of transport impacts, and the lack of consideration given to horses being trained at Epsom & Walton Downs and their travel to the grounds from local yards. It is considered the proposal materially and significantly diverges from adopted planning policies and therefore, we consider planning permission should not be granted.

If you have any questions regarding this objection or would like to discuss the Jockey Club's concerns further, please do not hesitate to contact us on the details below.

Yours sincerely,



**JUSTIN THOMAS MRICS**  
GROUP PROPERTY DIRECTOR  
Group Property

E: [Justin.Thomas@thejockeyclub.co.uk](mailto:Justin.Thomas@thejockeyclub.co.uk)

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