

18 August 2025

Objection to Planning Application 25/00846/OUT – Langley Bottom Farm, Langley Vale Road, Epsom

Application Description: Outline application (with all matters reserved except access) for up to 110 dwellings (including affordable homes) at Farm View, Langley Bottom Farm, Langley Vale Road, Epsom.

Applicant: Fairfax Aspire Ltd (Agent: Boyer Planning)

Site: c.5.2 hectares of Green Belt agricultural land (“Farm View” field) adjacent to Langley Vale village, Epsom Downs.

1 Introduction

- 1.1 We write on behalf of our client, Langley Vale Action Group in association with Woodcote (Epsom) Residents’ Society, to object to this proposal in the strongest terms. Our detailed objections, structured by planning issues, demonstrate that the scheme conflicts with the National Planning Policy Framework (NPPF, Dec 2024) and key policies of the Epsom & Ewell Core Strategy 2007 and Development Management Policies 2015. We urge the Council to REFUSE this application for the reasons set out below.

2 Green Belt Policy and Principle of Development

- 2.1 The application site lies within the Metropolitan Green Belt, where there is a presumption against inappropriate development. Both national and local policies seek to maintain the Green Belt’s openness and prevent urban sprawl. Core Strategy Policy CS2 commits to maintaining the existing Green Belt boundaries and exercising “*strict control... over inappropriate development as defined by Government policy*”. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in ‘Very Special Circumstances’ (NPPF paragraphs 153-160). No such circumstances have been demonstrated here.
- 2.2 Regardless of whether the site meets the definition of Green Belt outlined in the NPPF it is considered that the proposal would fail to comply with the requirements of Paragraph 155 of the Framework and accordingly would be inappropriate development in the Green Belt.
- 2.3 The proposal would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan (Para 155a). The Council’s Green Belt Study and Sustainability Appraisal submitted to the Local Plan examination emphasises that this particular site being promoted by the landowner for housing development is one where ‘Landscape and visual sensitivity are high and there is a high overall sensitivity to development where the impact on openness is considered to be high. The existing urban edge is rounded off and clearly delineated. The proposed site boundaries do not follow a recognisable feature that is likely to be permanent and is considered to be weak and would extend the urban edge in awkward manner. Therefore, the overall integrity of the Green Belt in this location would be considered compromised.’
- 2.4 The proposal would also not be within a sustainable location (para 155c). It would essentially be dependent upon private car use, given the paucity of public transport services in the area and it would not be conveniently located to essential key services such as retail, education and medical facilities. It would

generate the need to travel by private car without a genuine choice of transport modes and would consequently add to existing traffic congestion and emissions. The active travel options cited by the applicant are unrealistic and unattractive given topography, unsuitability in inclement weather and safety considerations in hours of darkness.

- 2.5 Furthermore, the Golden Rules (set out in Paragraph 156-157 of the Framework) would not be met, the proposed 50% affordable housing is simply not viable and will be reduced at a later stage with developer using the viability argument. The applicant is not proposing any off-site infrastructure works notwithstanding the well documented problems with water supply, drainage and traffic congestion affecting Langley Vale village and the safety concerns raised by the Jockey Club and its requirements for upgrading of the footpath to a bridleway along Langley Vale Road and other associated highway improvement works. Neither is there any credible improvement to accessible green spaces. The existing site comprises predominantly open green space and this proposal will wipe that out.
- 2.6 The proposal represents a fundamental conflict with Green Belt policy. The proposal for 110 new dwellings on open farmland represents a major encroachment into Green Belt countryside. This is exactly the type of unrestricted sprawl the Green Belt is intended to prevent. The site is outside any settlement boundary and is not identified for development in the Local Plan. The Council's Core Strategy directs new housing to within the defined built-up areas and previously developed land, not Green Belt fields (CS1, CS8). By building on undeveloped Green Belt land, the scheme breaches Policies CS1 and CS2 and the spatial strategy of focusing growth on sustainable urban sites.
- 2.7 With regard to matters of openness and the purposes of the Green Belt, the proposed housing would permanently reduce the openness of this 5+ hectare site. Replacing an open field with a large housing enclave (even at two storeys) and a new access road will cause a severe loss of Green Belt openness both visually and spatially. It will also conflict with Green Belt purposes by contributing to the outward expansion of Langley Vale village into open countryside. Notably, the site forms part of a swathe of Green Belt that separates Langley Vale from Epsom Downs and neighbouring settlements. Introducing 110 homes would undermine the Green Belt purpose of safeguarding the countryside from encroachment.



- 2.8 With regard to the Council's five-year housing supply (5YHLS), we acknowledge that Epsom & Ewell Borough is presently unable to demonstrate a five-year housing land supply. However, national policy is clear that the "tilted balance" in favour of housing (NPPF paragraph 11d) does not apply where protected areas like Green Belts are involved. Green Belt policies provide a "clear reason for refusing" permission (as per NPPF footnote 7). In other words, the acute housing shortfall does not override Green Belt protection. The applicant's own planning statement acknowledges that the site is Green Belt but tries to downplay its contribution by calling it a "relatively discrete parcel" near a village. This argument is, in our view, spurious.

Green Belt status does not depend on a site's size or perceived discreteness. Any new housing here is inappropriate by definition, particularly in the circumstances of failing to meet the exceptions allowed by paragraphs 155 and 156 of the Framework.

- 2.9 With reference to Very Special Circumstances (VSC) as defined in paragraph 153 of the NPPF, we believe that the applicant has not demonstrated VSC necessary to justify Green Belt development in this instance. General housing need, even with some affordable housing, is not considered a very special circumstance on its own. If unmet housing need were sufficient, vast swathes of Green Belt would be at risk. The bar for VSC is high and the benefits must clearly outweigh the total harm to the Green Belt and any other harm. In this case, the harm is substantial (in particular, loss of openness, countryside character, infrastructure strain, etc.), as detailed throughout this objection. The purported benefits (110 homes, of which 50% may be affordable) do not clearly overcome these harms. The Langley Bottom Farm appeal (for a scheme of 20 dwellings) was allowed on a narrow point concerning previously developed land in the farmyard, and its discrete positioning in the valley bottom. Those unique circumstances do not apply to this new greenfield proposal. The current application encompasses open cultivated fields, which are explicitly excluded from the NPPF definition of previously developed land (PDL) and is situated in a prominent elevated position. A more recent appeal for a single dwelling house midway along the farm track at the bottom of the valley was dismissed because it was found that it would appear as a sporadic development and piecemeal urbanisation of a generally open area of land which forms part of the transition between the built environs of Langley Vale and the wider countryside setting.' It is clear that this 110-home scheme is new, unrestricted housing development on greenfield Green Belt land, for which no policy support exists.
- 2.10 In summary, the proposal comprises inappropriate development in the Green Belt, causing significant harm to openness and Green Belt purposes. It contravenes NPPF (2024) Green Belt policy, Core Strategy policies CS1 and CS2, and Development Management Policy DM1 (which affirms the Green Belt will be maintained in its present extent). The very special circumstances test is not met. The principle of development is therefore unacceptable and warrants refusal on Green Belt grounds alone.

3 Landscape and Visual Impact – Area of Great Landscape Value (AGLV)

- 3.1 The application site lies within an Area of Great Landscape Value (AGLV), a locally designated landscape of high quality that serves as a buffer to the Surrey Hills Area of Outstanding Natural Beauty (AONB). The land is an open valley field forming part of the scenic Epsom Downs landscape. It is not only Green Belt but also AGLV, underscoring its importance. The site's rural valley setting contributes to panoramic views from Epsom Downs and the approach into Langley Vale. Local policy (Core Strategy CS3 and CS5, Development Management DM5 and emerging Draft Policy DM10) all seek to protect the Borough's landscape character and scenic assets. The Draft Local Plan Policy DM16 recognises that some of the borough, such as the area to the south-west of Langley Vale, is designated an Area of Great Landscape Value (AGLV) by the Town and Country Planning Act, because of its particular scenic value. This landscape makes an integral contribution to the borough's unique character and sense of place. Landscapes such as this are vulnerable to the impact of development especially from major housing development. It is therefore important that, rather than having an adverse effect, new developments complement and enhance the landscape.
- 3.2 Introducing a large housing estate on this currently undeveloped green slope would be severely detrimental to the landscape character. The open rural character of Langley Vale would be permanently urbanised by roads, cars, and buildings. The applicant describes the scheme as "modest" edge development but 110 houses plus infrastructure is considered a major development in this context, and would provide roughly a 20-27% increase in the Village's housing stock. It would extend the built footprint of Langley Vale into open countryside, eroding the visual separation between the village and the Epsom Downs racecourse area. The site occupies a prominent field visible from surrounding higher ground; as campaigners note, housing here "would have an enormously harmful impact on our attractive open countryside". The current pleasant vista of fields and woodland would be interrupted by rooftops, estate roads, and domestic paraphernalia. This is contrary to Core Strategy CS1, which requires development

to “protect and enhance the natural... environments of the Borough” and safeguard quality of life for present and future generations. More importantly it is in conflict with paragraph 187 of the NPPF which requires that planning decisions ‘should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes.

- 3.3 The AGLV designation indicates that the site’s landscape is of county-level importance. Indeed, the AGLV here directly adjoins the nationally protected Surrey Hills AONB (National Landscape Designation) just south of the Borough.
- 3.4 Policy DM5 (Trees and Landscape) expects development to respect and enhance landscape quality, retaining important landscape features and vistas. In this case, the proposal does the opposite as it would urbanise a valued rural valley, diminishing the landscape quality that warranted the AGLV designation.
- 3.5 The scheme will have a harmful visual impact upon key receptors. In particular, users of the Epsom Downs, including visitors to the famous Derby racecourse, will experience the visual intrusion. The site is described by residents as “a key element of Epsom Downs and the setting to our historic racecourse”. The open field currently provides a green foreground to the Downs and building on it would mar views particularly “on travelling downhill towards the village with its vista of open land”. Walkers, riders, and cyclists on local footpaths/bridleways (including routes connecting to Headley and Walton-on-the-Hill) would also see a stark change from countryside to housing. The applicant may propose landscaping, but any screening or tree planting will take many years to establish and mature and this can only partially mitigate the loss of openness. At night, lighting from 110 homes and streetlights will introduce significant light pollution into what is currently a dark area, further impacting the natural character and local wildlife (see Ecology section). In summary, the scheme fails to “conserve or enhance” landscape beauty as required by NPPF and local policy. Instead, it would cause irreversible visual harm to a highly valued landscape.
- 3.6 The applicant’s submitted Landscape and Visual Impact Assessment has limited credibility because it has been undertaken with no certainty about the siting, scale or massing of the proposed development. All of these key elements are reserved matters and therefore any conclusions reached should be given very little weight. We would argue that it should be abundantly clear that the construction of a housing estate on a prominent sloping open area of open land in a rural setting is bound to constitute a significant adverse visual impact and not be one of ‘moderate adverse’ reducing to ‘minor adverse’ as planting matures.
- 3.7 In summary, the proposed development would significantly damage the character and appearance of an AGLV landscape and the setting of Epsom Downs. It conflicts with Para 187 of the NPPF, Core Strategy CS3, which states that biodiversity and landscape designations will be given appropriate protection and with CS5, which requires protection of areas of special character and their settings. It also fails DM5 (Trees & Landscape) by neither retaining the essentially open landscape character nor achieving meaningful enhancement. Rather it necessitates removal of rural features and adds an incongruous urban element. This landscape harm carries great weight against the proposal and cannot be acceptably mitigated.

4 Heritage and Historic Environment

- 4.1 The site lies in proximity to heritage assets and areas of historic importance. In particular, it is part of the setting of Epsom Downs Racecourse, an iconic historic sporting venue (home of the Derby since 1780). The open downland around the racecourse, including Langley Bottom, contributes to its historic landscape context. As local residents emphasise, this valley forms “the setting to our historic racecourse”. Epsom’s Core Strategy CS5 and Development Management DM8 seek to protect heritage assets and their settings, including historic landscapes, and to resist harmful development.
- 4.2 Part of the boundary between the proposed development and The Warren woods is an ancient wall. In The Warren are Warrener's cottage and this wall off which much is visible today and still standing. English Heritage has the cottage and wall listed as Grade II. The wall is believed to be one of only two surviving in England with hare gaps visible. The Hare Warren is marked on Rocque’s map of 1768. The wall will form part of the northern boundary of the development, but no reference has been made to the listed status of this boundary.

- 4.3 While the racecourse itself is not a listed building, it is unquestionably an undesignated heritage asset in terms of cultural history, and the surrounding open Green Belt land has material heritage value as part of Epsom's identity. Introducing a large modern housing estate on this adjacent field would visually intrude upon the racecourse approaches and dilute the historic rural setting that visitors experience when approaching from the south. The area includes WWI-related sites (Langley Vale Centenary Wood with memorials) and long-standing horse training gallops nearby. The proposal could thus indirectly affect these non-designated heritage assets by altering their context.
- 4.4 Furthermore, the site's location and size (over 0.4ha) triggers the need for archaeological assessment under Policy DM8. The North Downs are known to have archaeological potential (e.g. prehistoric or wartime remains). An archaeology desk study and basic field evaluation, in line with DM8, a prior assessment has established the likely presence of remains for Romano-British, Medieval and Post Medieval periods.
- 4.5 In summary, by eroding the open setting of Epsom Downs Racecourse and potentially disturbing undiscovered archaeology, the scheme fails to conserve the historic environment. It conflicts with policies CS5 and DM8, which require new development to *"take every opportunity to conserve and enhance"* heritage assets and their settings. The harm to the distinctive historic character of Epsom Downs and Langley Vale, currently a *"separate and distinct community... surrounded by Green Belt"*, adds to the cumulative reasons why this proposal is unacceptable.

5 Ecology and Biodiversity

- 5.1 The Langley Bottom Farm site and its surroundings support a rich array of wildlife and habitats, which would be placed at risk by this development. Core Strategy CS3 commits to conserving and enhancing biodiversity across the Borough, giving the highest level of protection to designated sites and ensuring development elsewhere minimizes harm and provides mitigation. Development Management Policy DM4 reinforces that development affecting habitats of importance will only be permitted in exceptional circumstances (no alternative, overriding public interest) and that *"every opportunity should be taken to secure net benefit to the Borough's biodiversity"* through on-site assessments and enhancements.
- 5.2 Although the field is farmland, it is by no means *"low value"* for nature as the applicant suggests. Local observers report regular use of the site by deer, badgers, and a variety of bird species. Notably, skylarks (a protected ground-nesting bird) have been seen/heard on these fields, indicating the open grassland is an important habitat for them. The site is adjacent to ancient woodland at The Warren (northwest) and close to Langley Vale Wood (Woodland Trust site to the south-east) – these act as reservoirs for wildlife. The proposal itself acknowledges the presence of *"important hedgerows and trees"* on-site and proposes to retain and enhance them. These hedgerows likely serve as foraging and commuting routes for bats and birds. In addition, we note that the area is known for rare arable flora and chalk grassland species; the developer has not provided adequate surveys to rule out such ecological assets on the arable land itself.
- 5.3 The applicant suggests new ecological improvements like wildlife corridors linking to nearby woodland and retention of hedgerows as mitigation. While any mitigation is welcome in principle, it does not compensate for the fundamental loss of 5+ hectares of open habitat. Fragmented corridors around a housing estate are a poor substitute for undisturbed open land. Skylarks, for example, cannot thrive once the field is developed and no amount of planting will offset the loss of their breeding ground. As one local campaigner aptly put it, *"ecology mitigation doesn't mean anything if it doesn't change the wrongs and the impact on wildlife"*. We concur that the net impact is likely to be negative.
- 5.4 Development affecting protected species requires careful legal compliance (Wildlife & Countryside Act 1981, etc.). Policy DM4 stipulates that where protected species are present, appropriate mitigation and compensatory measures must be secured to ensure no net loss of biodiversity. A comprehensive species survey (for bats, badgers, birds, reptiles, etc.) has not been completed in the correct seasons. Without full survey data, the application should not be determined – one cannot condition away the presence of protected fauna. If, for example, badger setts or bat roosts are found on or near the site, the layout and construction timing would need significant adjustment. An example of this is the fact that the applicant's

submitted ecological assessment states that a 2024 survey found no direct evidence of badger activity and that ‘no direct impact risks have been identified’. Yet we understand that the Chair of West Surrey Badger Group has recently visited the site, found direct evidence of badgers in and around the site and that he will be submitting an objection. Approving the outline in absence of this information would be contrary to Policy DM4 and NPPF paragraph 187. In the case of badgers this would also be contrary to Natural England’s standing advice on avoidance, mitigation and compensation measures to be undertaken in such circumstances with the main thrust being that development proposals should avoid effects on badgers.

- 5.5 In summary, the proposal poses a high risk of significant harm to biodiversity, contrary to Core Strategy Policy CS3 and DM4. It would destroy or drastically alter habitat used by priority and protected species. The offered mitigation (retained hedges, wildlife corridors, landscaping) is insufficient to avoid a net biodiversity loss. Until the applicant demonstrates, with credible evidence, that biodiversity will be enhanced (or at least adequately safeguarded), permission must be refused. The precautionary principle applies. In its current form, the scheme fails to comply with national and local biodiversity policies and so cannot be supported.

6 Sustainability of Location and Climate Change Considerations

- 6.1 We believe that the proposed site represents an unsustainable location for the following reasons. Langley Vale village has limited facilities and poor public transport links, making this location unsuitable for major growth. The NPPF emphasises that new housing should be located where it enhances or maintains the vitality of communities and provides a genuine choice of transport modes. Epsom’s Core Strategy CS1 seeks development that positively contributes to sustainable development, and CS6 requires proposals to result in a sustainable environment with neutral or reduced impacts on pollution and climate change CS16 and DM36 further require that developments facilitate a shift to non-car travel and integrate into pedestrian/cyclist networks This proposal fails these tests:

- **Distance from Services:** Langley Vale has no doctors’ surgery, no secondary school, no supermarket and only one limited local shop at the nearby petrol station. Most day-to-day needs require travel to Epsom or other local centres. The site is over 3 miles from Epsom town centre (and uphill on return). There is a small primary school in the village, but an influx of 110 families could overwhelm it (see infrastructure section). The lack of sufficient local services means future residents will have to travel frequently for work, education, shopping, healthcare, etc., raising questions of sustainability.
- **Public Transport:** Bus provision is minimal. A single infrequent bus route serves Langley Vale – residents report a 2 hourly bus at best. There is no railway station within walking distance. As a result, the new homes would therefore be overwhelmingly car dependent. The applicant’s Planning Statement claims this is a “sustainable location”, but the reality is the opposite. There is no evidence of plans to substantially improve bus frequency or extend rail links to support 110 extra homes here.
- **Walking/Cycling:** At present, footpath infrastructure is lacking. The development would have its sole vehicular access on Langley Vale Road, separate from the existing village street network. Campaigners note the lack of adequate footpath connections for integrating the scheme with the village. Pedestrians would likely have to walk along Langley Vale Road (a rural road with narrow pavement in places) to reach the village amenities or bus stops. This raises safety concerns and further discourages walking. Policy DM7 protects footpaths/bridleways and expects new development to enhance such networks, not sever or neglect them. If this outline were approved, the reserved matters must incorporate safe pedestrian and cycle links into the village and to Epsom Downs, yet no such commitment is clearly demonstrated now. Without it, residents will simply get in their cars.
- **Car Dependency and Emissions:** With limited transport alternatives, the 110 households could generate in the order of 200–300 private cars on the site. This undermines both local and national

climate objectives. Transport is the largest contributor to UK carbon emissions and good planning should locate housing where sustainable travel is viable. Approving a car-reliant estate in this location would increase traffic (and thus CO₂ and air pollution) on the rural road network and in Epsom town. It therefore contradicts the spirit of Policy CS16, which encourages developments that “facilitate a shift... to non-car modes” and requires new proposals to “minimise the need for travel” (e.g. via travel plans, local facilities). Policies DM35 and DM36 echo these goals, requiring Transport Assessments and Travel Plans to demonstrate how sustainable travel will be achieved. We are concerned that the submitted Transport Assessment downplays the likely car trips or assumes unrealistically high bus usage given the current service levels.

- Sustainable Design & Climate Resilience: The outline nature of the application gives little detail on building design or sustainability measures. CS6 expects new development to incorporate sustainable construction, energy efficiency, and measures like Sustainable Drainage Systems (SuDS) to mitigate climate impacts. The Planning Statement’s claim of a “sustainable development” is not substantiated by firm commitments (e.g., will the homes be zero-carbon ready? Will there be solar panels, heat pumps, EV charging, high fabric efficiency?). If not, the development could lock-in high carbon emissions for decades. Building 110 homes on a greenfield also forfeits the carbon sequestration that the current land (soil, crops, vegetation) provides.

6.2 In summary we consider that the proposal is locationally unsustainable. It conflicts with the core principle of directing growth to sustainable locations with infrastructure and alternatives to driving. It fails Core Strategy Policies CS1, CS6, CS16 and DMP Policies DM35, DM36, which collectively demand that new development minimises pollution and facilitate sustainable travel. Approving this scheme would run counter to Epsom & Ewell’s climate change commitments and Surrey’s climate emergency response. The development cannot be made truly sustainable by the imposition of conditions. The fundamental issue is that this is the wrong place for major new housing development.

7 Traffic, Access and Highway Safety

7.1 In terms of traffic generation and network impact, an estate of up to 110 homes will generate a significant number of vehicle movements. This is likely to be in the region of several hundred trips per day we do not accept that there would be one two-way trips per minute during peak hours which and there would of course be many trips outside peak hours. The transport assessment significantly under reports the likely traffic implications. This raises concerns under Policy DM35, which requires that the transport impacts of new development be properly assessed and mitigated. We question whether the rural road network serving Langley Vale can accommodate this increase without adverse effects. Langley Vale Road is relatively narrow and winding in parts. The junctions connecting the village to the wider network (e.g. towards the B290 or through Woodcote) may face congestion or safety issues with additional traffic. Local residents have already raised concern that the scheme would “add to the existing severe pressure on... infrastructure, especially from increased traffic and congestion”. This directly contravenes the notion of development “without undue impact on... the wider area” that the applicant claims. In reality, undue traffic impact is likely.

7.2 The applicant proposes a new site access off Langley Vale Road. While visibility splays and technical design may meet standards (details reserved), having an extra junction on this road and funnelling potentially 200+ cars out of it will inevitably affect traffic flow and pose turning risks. There are also equestrian activities in the area (racehorse training facilities, private stables) and many horse riders use the roads/bridleways. More cars and construction vehicles on Langley Vale Road increase risks for these vulnerable road users. The Transport Assessment should have consulted on this and we urge close scrutiny by Surrey County Council Highways.

7.3 Policy DM37 requires development to comply with the Borough’s parking standards to avoid overspill problems. At outline stage, details are scant, but up to 3 spaces per dwelling for the largest units would be needed given the lack of other transport options. That’s in the order of 250+ parking spaces. If a lack of sufficient parking is provided, Langley Vale Road or village lanes could suffer overflow parking, causing

obstruction. Conversely, large surface parking areas would further erode the rural character. A balanced and policy-compliant approach is needed.

- 7.4 Although not a direct policy conflict, we note that constructing up to 110 homes here will involve HGVs and contractor traffic over a protracted period. With only one main access road into Langley Vale, construction traffic management will be critical to avoid highway safety dangers and undue disturbance to residents (noise, dust). A robust Construction Transport Management Plan is required but again the feasibility is unproven.
- 7.5 The proposal's traffic and access impacts appear incompatible with the objectives of policies DM35 and CS16. It has not been demonstrated that safe and suitable access can be achieved for all users, or that the residual traffic impact would be acceptable. To the contrary, evidence suggests congestion and safety could worsen in this rural community. Without clear highway improvements or sustainable transport measures (which are not forthcoming), the development fails to promote safe, convenient access as required by CS16 (e.g. provide links to footways/cycleways and ensure cars do not predominate). We believe the adverse highway impacts are another strong ground for refusal.

8 Local Infrastructure and Community Facilities

- 8.1 A development of this scale would place substantial new demands on local infrastructure and services. Core Strategy Policy CS12 mandates that developers demonstrate adequate service/community infrastructure is in place, or else provide new/enhanced facilities to support the development. If infrastructure is lacking and cannot be reasonably provided, development should not proceed. In this case:

- **Education:** Langley Vale has one primary school (Vale Primary School) of limited size. An influx of potentially c.200+ children (assuming a mix of family housing) could overwhelm school capacity. Surrounding schools in Epsom or Ashted might also be full. The developer would need to contribute to expanding school facilities under CS12. However, expanding a rural school or transporting children to distant schools is not trivial. There is no indication the applicant has liaised with Surrey County education authority to ensure school places can be provided. Until a solution is identified, the development risks exacerbating an existing deficiency in education provision, contrary to Policy CS12.
- **Healthcare:** There is no GP surgery or health centre in Langley Vale. Residents rely on surgeries in Epsom or nearby villages. Many of those practices are under strain (long waits for appointments). Adding c.110 families would worsen this position. Policy CS12 again would require a financial contribution to healthcare infrastructure. But in practice, delivering a new GP branch or enlarging a surgery takes time and NHS agreement. The outline application is silent on this matter. We believe new residents would face inadequate local healthcare, and existing residents would see services stretched thinner and hence a material consideration against the scheme.
- **Utilities:** The capacity of water supply, sewage, and other utilities must be confirmed. This area may have constraints on sewer capacity or water pressure. A recent household survey of Langley Vale village undertaken by the Save Langley Vale Action Group confirms that low water pressure is a regular and widespread problem across the village. A full utilities assessment is needed. If pumping stations or network upgrades are required, that adds cost and complexity. Foul drainage from 110 homes, if not properly managed, could significantly impact the environment (e.g., sewage outflow incidents which are increasingly prevalent in other areas of the south-east as a result of a lack of capacity). Surface water drainage is discussed separately.
- **Community Facilities & Open Space:** Langley Vale has minimal community infrastructure (a small village hall). An extra 110 homes would increase demand for play spaces, sports, and social facilities. Under CS12/DM6, the development should provide on-site open space and recreation areas or contribute to off-site facilities. The Planning Statement mentions "on-site open space" in line with policy, but specifics are lacking at this outline stage. Will there be a local equipped play area (LEAP) for children? Sports pitches? If not properly planned, the development could lead to a deficit of open

space, which policies CS4 and DM6 seek to resist. Also, without a community hub, the new residents have limited ways to integrate, undermining social sustainability.

- **Developer Contributions & Viability:** Meeting all these infrastructure needs (school expansion, healthcare, highways, open space, possibly public transport subsidies) will require substantial Section 106 contributions or Community Infrastructure Levy. Policy CS12 is clear that developers must provide or fund necessary infrastructure proportionately to the scale of the development. This is further re-enforced by the requirements of Paragraph 156 of the NPPF. We urge the Council to rigorously assess the viability: of the proposals. If 50% of the homes are affordable (as claimed) will the developer still commit to all required contributions?, Viability should not be a reason to later cut either affordable units or infrastructure funds. If the numbers don't add up, the application is fundamentally unsustainable.

8.2 In summary, the application has not demonstrated that necessary infrastructure will be in place, as required by Policy CS12. It risks aggravating shortages in school places, healthcare, and community amenities. Approving it without firm infrastructure plans would burden existing residents and future occupants alike with inadequate services – an outcome at odds with the NPPF's aim to create sustainable, well-functioning communities. This is yet another reason the proposal is unacceptable in its current form.

9 Flood Risk and Drainage



- 9.1 Although not adjacent to a major watercourse, developing a large greenfield site can significantly alter drainage patterns and increase flood risk if not carefully managed. Development Management Policy DM19 and NPPF paragraph 170 require development to be directed to areas of lowest flood risk and ensure it does not increase flooding elsewhere. A site-specific Flood Risk Assessment (FRA) is expected for a site of this size (>1 hectare), focusing on surface water management.
- 9.2 In terms of current drainage characteristics, Langley Bottom is a natural valley. Rain falling on the site currently infiltrates into the soil or runs off gradually toward lower ground. The land is likely a mix of chalk and clay and whilst parts may drain freely, heavy rainfall could cause surface water pooling or overland

flow down the valley. Local anecdotal evidence suggests the fields get boggy in winter and that drainage ditches along Langley Vale Road are sometimes overwhelmed. Furthermore, climate change is increasing the intensity of downpours, exacerbating flash flood risks.

- 9.3 Replacing permeable fields with roofs, roads, and driveways will greatly increase impermeable area. Without robust mitigation, this would send more runoff into local drainage systems and watercourses at a faster rate, raising flood risks for: (a) the new homes themselves, (b) existing homes downhill in Langley Vale, and (c) the surrounding area (roads, nearby fields). It is imperative that a sustainable drainage scheme (SuDS) be implemented – e.g. attenuation ponds, swales, permeable pavements – to greenfield runoff rates. The applicant indicates a willingness to use SuDS, but no detailed drainage strategy is yet provided (only an outline has been provided). We must be assured that there is space within the layout for necessary attenuation basins and that they can discharge safely (possibly to groundwater or controlled outfall). Given the valley topography, careful engineering is needed to avoid simply concentrating water toward one end of the site or onto neighbouring land.
- 9.4 Foul water from 110 homes will need to go to the mains sewer. It is unclear if the existing sewer network in Langley Vale has capacity or if upgrades (e.g. a pumped solution) are required. Surrey’s Flood Risk guidance and Policy CS6 also require that water quality be protected surcharging sewers can cause pollution incidents. The developer should obtain confirmation from Thames Water that sewer capacity is available, or fund upgrades as necessary. Approval should not be given until this is resolved.
- 9.5 It is very concerning that there appears to be no mention of the Langley Vale Chalk Aquifer which is part of the extensive Chalk aquifer in England’s Thames Basin, a major aquifer known for its dual porosity (fractures and matrix) system and its importance for drinking water and river flow. This aquifer’s properties, including high transmissivity in valleys and decreased permeability with depth, influence groundwater quality and the fate of pollutants like nitrates. The aquifer is vulnerable to pollution from farming practices and drainage from residential developments and conflicts between water abstraction and environmental needs, such as maintaining river flows, are ongoing challenges
- 9.6 Policy Compliance: CS6 and DM19 effectively require that new development “avoids increasing the risk of flooding” and incorporates SuDS to manage runoff on-site. Also, NPPF (2024) expects major developments to provide betterment in surface water management where possible. At present, without a full drainage design and maintenance plan, we cannot be confident the scheme meets these requirements. Any subtle change in site layout at reserved matters could impact drainage functionality, so it’s a critical consideration now.
- 9.7 In summary, we urge the Council’s drainage engineers to scrutinise the FRA and SuDS proposals once submitted. If they are found lacking, the application should be refused or deferred. We cannot support a scheme that might inadvertently cause surface water flooding to the village or create long-term drainage liabilities. Until proven otherwise, we are concerned that the development may pose an unacceptable flood risk, contrary to DM19 and CS6. It should be noted that a poorly drained development would also conflict with the broader sustainability aims of CS1 and CS6 (protecting environmental quality for future generations).
- 9.8 We note the Thames Water have not submitted a consultation response stating that there the applicant’s technical reports do not have sufficient detail in order to be able to assess the application and further that the applicant has not responded.

10 Housing Need, Density and Mix

- 10.1 We recognize the Borough’s need for additional housing, including affordable housing. However, the ends do not justify the means in this case. There are significant issues with the proposed housing delivery on this site in terms of density, mix and meeting local needs:
- Plan-Led Delivery: The proper way to meet housing need and major development proposals is through the Local Plan process, identifying sustainable sites with community support. This speculative application attempts to bypass that process by targeting protected Green Belt land.

Approving it would undermine public confidence in the plan-led system and could encourage other Green Belt developers, jeopardising the Council's ability to strategically plan for housing and infrastructure.

- **Density and Design:** Policy DM11 states that new housing should make efficient use of land within the urban area and be of a density that respects the visual character of the area. It suggests a general density limit of 40 dwellings/ha unless exceptional circumstances apply (e.g. town centre sites). Here, the proposed density is around 21 dph (110 units on c.5.2 ha). Numerically this is not high, indeed one might argue it underutilises land. But in context, 21 dph in a rural-edge location can still appear cramped or urban if not sensitively designed. The surrounding village has a loose-knit form and new estates with smaller plots will look out of place. DM11 also crucially requires that housing density should "lead to no net loss of biodiversity". This scheme fails this test (as discussed in the ecology section above). We are concerned that to achieve 110 units, the layout might rely on uniform suburban house types that neither reflect local distinctiveness nor provide adequate gardens (which DM11/Supporting text recommends for family houses: e.g. 70m² private garden for 3+ bed). All these design issues would be dealt with at reserved matters, but the outline predetermines certain parameters (like total unit count) that could force a compromised design later.
- **Affordable Housing:** The applicant has indicated up to 50% affordable housing which would be in accordance with the NPPF Golden Rule on affordable housing requirement. We welcome any genuine effort to deliver more affordable homes, as affordability is a pressing local issue. However, we note concerns from younger residents that what is labelled affordable may not truly meet local needs. For instance, if the affordable homes are delivered as First Homes or shared ownership, priced at c.80% of market value, they will still be out-of-reach for many (with average Epsom house prices around £550k, even 80% is c.£440k and hence not "affordable" to ordinary first-time buyers). We urge that if the scheme were approved, a suitable tenure mix (including genuinely affordable rent) be secured to align with Policy CS9 (which calls for meeting identified local housing needs in mix and tenure). That said, even a perfect affordable housing offer cannot outweigh the environmental and policy conflicts we have identified. The local community should not be forced to sacrifice Green Belt for housing that does not even properly address the type of homes most needed (e.g. truly low-cost rent or social housing for young families and older downsizers).
- **Housing Mix:** As the scheme has been submitted in outline, details on housing mix are scant, but presumably the 110 units would comprise a mix of sizes. To meet local needs, a range of 1, 2, 3, and 4-bed units should be provided, with an emphasis on genuinely affordable family homes and some specialist housing (maybe bungalows for the elderly or accessible units). There is no indication such nuance has been considered yet. The risk is a layout dominated by 3-4 bed market houses (for profitability) with token apartments to hit numbers and not necessarily the optimal mix the Borough needs. This contravenes Policy CS9 which seeks a mix that meets needs and creates sustainable communities

10.2 In summary, whilst it is acknowledged that there is a need for new homes, this proposal is the wrong solution in the wrong location. The modest contribution of 110 homes (of which c55 affordable) cannot justify the severe adverse impacts identified in sections above. The Council is working on a new Local Plan which will weigh options for meeting housing targets, including which Green Belt areas, if any, might be released. A premature and piecemeal approval here would pre-empt that comprehensive approach and possibly set a damaging precedent.

10.3 In summary, we believe that the proposal does not accord with Policy CS7 or CS8 in terms of planned housing provision (those policies envisioned meeting requirements within the built-up area). It meets Policy CS9's numeric target on affordable housing but risks failing the deeper intent of meeting local need with genuinely affordable products. Its density and form are not shown to materially enhance the area's character, thus conflicting with DM11. In planning, the quality and location of housing matter just as much as the quantity. This scheme falls short on both counts, reinforcing our view that it should be refused.

11 Impact on Racehorse Industry

- 11.1 The proposal would have a serious adverse impact on the operation of the local racehorse training industry because the site is directly adjacent to the access routes and horse racing training areas on the Downs.
- 11.2 Much of the impact would be because of the increased road traffic movements and the new road access resulting in increased danger to racehorse safety but it would also arise from increased pedestrian activity along Bridleway 127 which is identified in the applicant's submitted Transport Assessment as a key link for residents to Tattenham Corner. Bridleway 127 is a key access point for racehorses entering the gallops. Further details of this adverse impact are given in the Jockey Club's objection.
- 11.3 The racehorse training industry is a vital part of this Borough's heritage and economy. Indeed, Epsom has an international reputation for horse racing and is an established location for the 10 racehorse training yards around the Epsom Downs racecourse. Any development proposal which threatens the future viability of an industry in the Borough of national importance, and which contributes an estimated £63m pa to the local economy should be resisted.
- 11.4 We would contend that the application proposal would be in conflict with the requirement of paragraph 87 of the NPPF to recognise and address the specific resilience requirements of an industry of local, regional and national importance. It would also be in conflict with Policy DM26 in failing to support the maintenance of a successful race-horse industry in the Borough.
- 11.5 There is also a detailed objection submitted from the Epsom and Walton Training Grounds Management Board

12 Conclusions

- 12.1 For the reasons detailed above, Langley Vale Action Group respectfully urges the Council to refuse this application. In summary:
- **Green Belt:** The development is inappropriate and harmful in principle, contrary to national policy and Policy CS2. It would erode Green Belt openness and encourage sprawl, with no very special circumstances to justify it.
 - **Landscape (AGLV):** It would permanently scar a valued landscape (buffer to AONB), violating Policies CS3, CS5 and DM5. Housing on this prominent Green Belt field would have an enormously harmful impact on the attractive open countryside.
 - **Heritage:** It harms the setting of the historic Epsom Downs Racecourse and potentially archaeological assets, contrary to Policies CS5 and DM8.
 - **Ecology:** It threatens local biodiversity (badgers, deer, skylarks and more) with inadequate mitigation, failing Policies CS3 and DM4 which require biodiversity to be conserved and enhanced.
 - **Sustainability and Transport:** The site is isolated with poor public transport and footpath links. The car-dependent nature of the development conflicts with Policies CS1, CS16, DM35, DM36, and would exacerbate traffic and carbon emissions
 - **Infrastructure:** Local services (schools, healthcare, etc.) are insufficient. Without guaranteed new provision, the scheme cannot meet Policy CS12. Development should not proceed where it would exacerbate a deficiency in infrastructure.
 - **Drainage:** In the absence of a detailed and robust drainage plan, the scheme may increase flood risk, contrary to Policies CS6 and DM19. SuDS and sewer upgrades must be certain to prevent harm.
 - **Housing Objectives:** While providing new homes (including affordable) is a benefit, it does not outweigh the above harms. The proposal bypasses the plan-led approach and fails to demonstrate a sympathetic density or mix per Policies DM11 and CS9.

- Impact on the Racehorse industry. The proposal would have a serious adverse impact on the operation of the local racehorse training industry.

- 12.2 In conclusion, the adverse impacts of this development significantly and demonstrably outweigh its benefits, even under the most housing-favourable planning balance. Moreover, protected Green Belt policies provide a clear refusal reason independently. Approving this application would conflict with numerous development plan policies and the NPPF and would set an unwelcome precedent for Green Belt erosion across the Borough.
- 12.3 We therefore object in the strongest terms and request that the Planning Committee **REFUSE** application 25/00846/OUT. We trust the Council will uphold its adopted policies and the integrity of Epsom and Ewell's Green Belt and countryside by doing so.
- 12.4 Thank you for considering our comments. We ask to be kept informed of the progress of this application and be notified in advance of any decision made.

Carl Thomas MSc _____
v.3, 18 August 2025