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To Gemma Paterson, Case Officer

25/00846/OUT - Outline application for up to 110 dwellings including affordable homes (all matters reserved except access from Langley Vale Road) Farm View Langley Vale Road Epsom Surrey KT18 6AP

I am writing on behalf of the Woodland Trust, to raise a number of issues we ask you to consider in determining whether or not to approve this application.

The Woodland Trust is the UK's leading woodland conservation charity working for a world where woods and trees thrive for people and nature.

We have a dual interest in this planning application: from a policy point of view in terms of its impact on woods and trees; and any operational impacts on our Langley Vale Wood site.

We also note the concerns raised by CPRE Surrey that this site is not allocated into the local plan, and that any development would be an incursion into the London Metropolitan Green Belt and an Area of Great Landscape Value (AGLV), requiring demonstration of exceptional circumstances to proceed.

Landscape and woodland impacts

While we have never had ownership of the Farm View site, it does form part of the same landscape as Langley Vale Wood. Under the management of the Woodland Trust, ancient woodland at Langley Vale Wood has been restored

and new native woodland established. 40% of Langley Vale Wood is maintained as open land, supporting rare arable plant assemblages. The variety of habitats at Langley Vale Wood support a wide range of wildlife, including badgers, red listed bird species, 5 species of bat and 32 species of butterfly, including the nationally scarce small blue butterfly.

In line with NPPF paras 187 and 192, it is vital that any developments in the wider area do not undermine the environmental quality of Langley Vale Woods through noise, light or air pollution, whether from construction or future use. It is also vital that any consents respect the connectivity of habitats identified in Surrey's Local Nature Recovery Strategy.

There is a significant area of ancient woodland, The Warren, to the north and east of the site which will require provision of a buffer, maintained free of any built elements or private gardens, and in place before the construction works. Natural England's requirement of a 15m buffer is a minimum: a larger buffer can be required depending on the size and nature of the adjacent development. Residential developments have damaging edge impacts on ancient woodland with cumulative impact over time, including from pet activity, invasive species, and light, air and noise pollution.

Should this planning application be approved;

- we ask that a precautionary approach be taken and that a 50m buffer for the ancient woodland is required, unless the applicant can demonstrate that a smaller buffer would suffice.

Site design requirements

Should the development be approved, there are some specific conditions that should be required within the site, in addition to protecting the wider landscape.

- We ask that any development be required to demonstrate 20% biodiversity net gain, in line with the emerging Epsom & Ewell local plan.
- We ask for a presumption to retain all existing trees and hedgerows on site, in line with NPPF para 136, and that if any trees removed it should only be for reasons related to the health of the tree.

Ancient trees outside woods enjoy the same protection as ancient woodland under NPPF para 193c. The Ancient Tree Inventory for the site may be incomplete.

- We ask that a full arboricultural survey of the site is required, including assessment of any ancient or veteran trees on site, and that these are identified, recorded and protected.

NPPF para 136 requires all new streets to be tree-lined.

- We ask that any new planting on site be conditioned to support biodiversity net gain and the priorities of the Surrey Local Nature Recovery Strategy, with a preference for native species, of local significance, and UK sourced & grown for biosecurity.

- We ask that all the required amenity greenspace and/or SANG be provided on site, without impinging on any areas of ancient woodland, or the root protection areas of protected trees.

Impact on Langley Vale Wood

The Woodland Trust's Langley Vale Wood is an important site for leisure, providing an inspiring connection with nature for visitors from a wide area. While there is pedestrian access from Langley Vale Road/Ebbisham Road using the public rights of way (PROW) network, the majority of access currently comes from the main entrance and car park on Headley Road.

Any increase in development on Langley Vale Road will inevitably increase foot traffic into our site from what is currently a minor access point, with knock on effects on site management, maintenance and signage requirements. Should the planning application be approved;

- we ask that the cost of any associated works should be borne by the applicant.
- we ask that the applicant be required to liaise with the Woodland Trust over the construction and traffic management plans.

We are also concerned about the impacts on the local water supply. Should the application be approved;

- we ask that the applicant be required to provide a water connection on our site, to secure our future access to water supplies.

Should you have any questions on our submission or require any further information, please do not hesitate to contact us.

Yours sincerely,



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