

REPORT

Addendum Proof of Evidence of Andy Ward BEng (Hons), CMILT, MCIHT

Farm View, Langley Vale

Client: Langley Vale Action Group
Reference: PC9437-RHD-XX-XX-RP-R-0003
Status: Final/03
Date: 1 September 2026

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Document title:	Addendum Proof of Evidence of Andy Ward
Subtitle:	BEng (Hons), CMILT, MCIHT
Reference:	Farm View, Langley Vale
Your reference	PC9437-RHD-XX-XX-RP-R-0003
Status:	-
Date:	Final/03
Project name:	1 September 2026
Project number:	-
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Date:	28 th August 2026
Classification:	Project related

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1 Introduction

- 1.1.1 My name is Andy Ward. I hold a Bachelor of Engineering with Honours (BEng Hons) in Civil Engineering. I am a Chartered Member of the Chartered Institute of Logistics and Transport (CMILT) and a Member of the Chartered Institution of Highways and Transportation (MCIHT).
- 1.1.2 I am a Director within Integrated Transport Planning (ITP), part of Haskoning UK Ltd.
- 1.1.3 This Addendum Proof of Evidence has been prepared following the publication of the National Planning Policy Framework update on the 17th August 2026 and seeks to address matters raised by that publication.
- 1.1.4 I am instructed by Langley Vale Action Group (LVAG) to give evidence on transport.
- 1.1.5 The appeal is by Fairfax Aspire Ltd (PINS 6006971) against the Council's refusal of outline permission for up to 110 dwellings, all matters reserved except access from Langley Vale Road, at Farm View, Langley Vale Road, Epsom (25/00846/OUT).
- 1.1.6 My evidence addresses Reason for Refusal 1, that the site ***“is sited in an unsustainable location with a lack of access to public transport and walking and cycling options, resulting in excessive reliance upon private car usage and a lack of alternative travel options...”***.

2 2026 National Planning Policy Framework

- 2.1.1 Referring to the reason for refusal, Section 1 paragraph 16 of the 2026 NPPF states that *“At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs...”* It is my opinion that the site is located in an unsustainable location, and due to poor connectivity to every-day amenities and services, the development would not meet the needs of residents, either now or in the future, without reliance on the use of the private car.
- 2.1.2 Policy S5 of the 2026 NPPF states that *“only certain forms of development should be approved outside settlements”*. Policy GB7 refers to development that is *“not inappropriate in the Green Belt”*.

- 2.1.3 Sub-sections (h)(i) and (h)(ii) of both policies refer to development being acceptable where it is “...*within reasonable walking distance of a well-connected station (applying the definitions in the glossary at Annex B)*” or “*physically well-related to the station or the settlement within which the station is located*”
- 2.1.4 For the purpose of policies S5 and GB7, page 111 of the NPPF defines a reasonable walk distance as being “*around 800 metres, or around 10 minutes’ walk time if topography, route availability and quality or physical barriers would prevent or discourage walking from up to 800 metres away.*”
- 2.1.5 The Transport Statement of Common Ground refers to Tattenham Corner Station being a 2,900m walk distance from the site and Epsom station being 4,000m from the site, well beyond an 800m walk distance. In my opinion, the site does not, therefore, meet the criteria defined within NPPF Policies S5 and GB7 that would allow development outside of a settlement or within the Green Belt to proceed.
- 2.1.6 **Policy TR1** of the 2026 NPPF refers to Vision-led planning for transport. Part 1(b) of the policy refers to “*Locating proposed development where it can support sustainable patterns of movement and make effective use of existing or proposed transport infrastructure, reflecting the principles in policy TR3. The Connectivity Tool should be used to inform the assessment and selection of sites for development alongside other relevant quantitative or qualitative evidence;*”
- 2.1.7 The 2011 Census referred to Langley Vale achieving a 1% travel to work bus mode share (refer to Andy Ward’s PoE dated 19 August 2026). The existing E5 bus service operates with a broadly similar, and in some periods lower, level of service than in 2011 (refer to **Tables 1 and 2**, and **Appendix AW – A1**) and there is no evidence that bus mode share has improved since 2011.

Table 1: Weekday E5 Bus Time Comparison, 2011 and 2026 (Langley Vale)

Time Period	2011 Bus Services (Reference: Appendix AW – A1)	2026 Bus Services (Reference: Transport Statement of Common Ground)
06:00 – 10:00	06:05 07:05 08:08 09:50	06:32 07:40 09:50
10:00 – 16:00	11:55 13:55 15:58	11:50 13:45
16:00 – 19:00	17:58 18:58	16:05 18:05 19:15

Table 2: Saturday E5 Bus Time Comparison, 2011 and 2026 (Langley Vale)

Time Period	2011 Bus Services (Reference: Appendix AW – A1)	2026 Bus Services (Reference: Transport Statement of Common Ground)
06:00 – 10:00	06:05 07:05 08:08 09:50	06:35 07:40 09:40
10:00 – 16:00	11:55 13:55 15:58	11:40 13:40 15:40
16:00 – 19:00	17:58 18:58	17:45 19:00
No Sunday service		

- 2.1.8 With reference to the Department for Transport (DfT) Connectivity Tool, Surrey County Council have objected stating that the site's Connectivity Index *“shows that the site scores 42 which comes in the bottom 15 percentile of the entire population of England and Wales, which is a very poor performance”*.

- 2.1.9 In my opinion, the census demonstrates that public transport opportunities in Langley Vale are not sufficient to support sustainable patterns of movement and there is no clear basis to conclude that the appellant's proposed measures would result in the 'step change' required to materially alter travel behaviour.
- 2.1.10 Policy TR3 refers to locating development in sustainable locations. Policy 1(a) states *"Development proposals which could generate a significant amount of movement, in the context of the area within which they would be situated, should be in locations that are sustainable (or which can be made so, taking into account planned improvements, including any provided for as part of the development itself). This means the location should limit the need to travel, particularly by private car, and offer a genuine choice of transport modes for residents and users, unless the nature of the development would make this impractical;"*
- 2.1.11 NPPF Policy TR4 requires development to *"give priority first to walking, wheeling and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating easy access to high quality public transport, with layouts and densities which maximise the catchments for bus or other public transport services"*.
- 2.1.12 Because the railway stations are distant, the connectivity to stations is poor, the topography of the area is not supportive of active travel and access to bus services is poor, it is my opinion that the development would neither limit the need to travel by private car nor provide a genuine choice of transport modes, contrary to the requirements of Policy TR3. Furthermore, easy access would not be provided to high-quality public transport services and the site's public transport catchment is limited, contrary to the requirements of Policy TR4.
- 2.1.13 The appellant has referred to data from the National Travel Survey (NTS) as evidence of the site's sustainability. However, in my opinion, the NTS is not a reliable indicator of a location's sustainability because it includes all journey types, including leisure and recreational trips such as jogging and dog walking, which are not directly related to accessibility to employment, services, facilities or public transport. Furthermore, while the NTS refers to 81% of trips under 1-mile as being 'walks' (for example) the actual distance of walks is unknown, we just know that a high proportion are less than 1-mile.

- 2.1.14 It is my opinion that the NTS does not provide appropriate evidence that the development accords with the NPPF's objective of directing development to locations that support sustainable patterns of movement and provide a genuine choice of transport modes.

3 Conclusion

- 3.1.1 In conclusion, it is my opinion that the appeal site is not located in a sustainable location and the development would not meet the needs of residents, either now or in the future, without reliance on the use of the private car.
- 3.1.2 The site is approximately 2,900m from the nearest railway station, significantly beyond the NPPF's definition of a reasonable walking distance of around 800m and therefore does not satisfy the requirements of Policies S5 and GB7 in relation to development outside settlements and proximity to well-connected stations.
- 3.1.3 Furthermore, limited bus service provision, poor connectivity and constraints to active travel would result in a significant reliance on private car travel. Accordingly, the proposals would not provide a genuine choice of transport modes and would not support sustainable patterns of movement, contrary to Policies TR3 and TR4.
- 3.1.4 The appellant's reliance on National Travel Survey data does not alter this conclusion, as it does not provide a reliable assessment of the site's sustainability.



Appendix AW – A1: 2011 E5 Bus Timetable

Dorking, Leatherhead, Epsom & Banstead

your guide to bus services

from March 2011 • FREE

**EPSOM STATION BUS STOP
CLOSURES INCLUDED IN
THIS BOOK**

including

Ashted, Bookham, Brockham, Capel,
Ewell, Holmwood, Mickleham,
Tadworth, Westcott

8&9



Timetables also available online at: www.surreycc.gov.uk

Langley Vale/The Wells - Epsom - Watersedge

E5

Quality Line

Epsom station rebuilding, the E5 diverted to Epsom Clock Tower

Mondays to Saturdays

	B															
Langley Vale Harding Road	0605	...	0705	...	0808	...	...	0950	...	...	...	1155	...	...	...	...
Wells Estate The Crescent	/	0645	/	0745	/	...	0920	/	1025	...	1125	/	1225	...	...	...
Epsom General Hosp, Woodcote Grn Rd	0608	/	0708	/	0812	...	/	0954	/	...	/	1159	/	...	...	...
Epsom General Hospital, Dorking Road	/	0648	/	0748	/	...	0924	/	1027	...	1127	/	1227	...	...	...
Epsom Clock Tower Stop B	0612	0652	0712	0752	0818	0852	0928	1000	1031	1058	1131	1202	1231	1258	...	...
Hollymoor Lane Shops	0621	0701	0721	0801	0828	0901	0937	1008	1040	1107	1140	1210	1240	1307	...	...
West Ewell Poole Road Shops	0625	0706	0725	0806	0833	0906	0942	1013	1045	1112	1145	1215	1245	1312	...	...
Watersedge	0630	0710	0730	0810	0838	0910	0948	1018	1050	1118	1150	1220	1250	1318	...	...
Langley Vale Harding Road	...	1355	...	...	...	1558	...	...	...	1758	...	1858	...	...	...	...
Wells Estate The Crescent	1325	/	1425	...	1525	/	1625	...	1725	/	1825	/	1925	...	...	...
Epsom General Hosp, Woodcote Grn Rd	/	1359	/	...	/	1601	/	...	/	1801	/	1901	/	...	...	...
Epsom General Hospital, Dorking Road	1327	/	1427	...	1527	/	1627	...	1727	/	1827	/	1927	...	...	...
Epsom Clock Tower Stop B	1331	1402	1431	1458	1531	1605	1631	1658	1731	1805	1831	1905	1931	...	...	...
Hollymoor Lane Shops	1340	1410	1440	1507	1540	1613	1640	1707	1740	1813	1840	1913	1940	...	...	...
West Ewell Poole Road Shops	1345	1415	1445	1512	1545	1618	1645	1712	1745	1818	1845	...	...	...	...	...
Watersedge	1350	1420	1450	1518	1550	1622	1650	1718	1750	1822	1850	...	...	...	...	...

Watersedge - Epsom - The Wells/Langley Vale

E5

Quality Line

Mondays to Saturdays

Watersedge	0615	0635	0715	0735	0815	0853	0920	0955	1025	1055	1125	1155	1225	1255	...	...
West Ewell Poole Road Shops	0620	0640	0720	0740	0820	0858	0925	1000	1030	1100	1130	1200	1230	1300	...	...
Hollymoor Lane Shops	0625	0645	0724	0744	0825	0903	0930	1005	1035	1105	1135	1205	1235	1305	...	...
Epsom Waterloo Road Stop F	0634	0654	0734	0754	0834	0913	0940	1013	1045	1115	1145	1215	1245	1315	...	...
Epsom General Hospital, Dorking Road	0637	/	0737	/	...	0916	/	1017	...	1119	/	1219	...	1319	...	...
Epsom General Hosp, Woodcote Grn Rd	/	0658	/	0758	...	/	0944	/	...	/	1148	/	...	/	...	...
Wells Estate The Crescent	0640	/	0742	/	...	0919	/	1020	...	1122	/	1222	...	1322	...	...
Langley Vale Harding Road	...	0703	...	0805	...	...	0948	...	...	...	1152	...	...	...	...	...
	B															
Watersedge	1325	1355	1425	1455	1525	1555	1625	1655	1725	1755	1825	1855	...	...	...	...
West Ewell Poole Road Shops	1330	1400	1430	1500	1530	1600	1630	1700	1730	1800	1830	1900	...	...	...	...
Hollymoor Lane Shops	1335	1405	1435	1505	1535	1605	1635	1705	1735	1805	1835	1905	...	...	...	...
Epsom Waterloo Road Stop F	1345	1415	1445	1515	1545	1615	1645	1715	1745	1815	1845	1915	...	...	...	...
Epsom General Hospital, Dorking Road	/	1419	...	1519	/	1619	...	1719	/	1819	/	1919	...	...	...	...
Epsom General Hosp, Woodcote Grn Rd	1348	/	...	/	1548	/	...	/	1750	/	1850	/	...	...	...	...
Wells Estate The Crescent	/	1422	...	1522	/	1622	...	1722	/	1822	/	1922	...	...	...	...
Langley Vale Harding Road	1352	...	...	...	1555	...	...	...	1755	...	1855	...	...	...	...	...

07/02/11

Code: B - Operates via Dorking Road for Rosebery School on schooldays

No service on Sundays or Public Holidays

The service between Langley Vale/The Wells and Epsom is operated on behalf of Surrey County Council

