

25th September 2025
Our Ref: 22.5032

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Planning Department
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Dear Gemma,

Re: Land Parcel to the North of Langley Bottom Farm, Epsom

This letter provides a formal response to public comments received during the statutory consultation period in relation to the Outline Planning Application 'for up to 110 dwellings including affordable homes (all matters reserved except access from Langley Vale Road)' at Langley Bottom Farm Field (the 'Site') (Ref: 25/00846/OUT).

This letter seeks to address several matters which have been raised, providing clarification where appropriate and demonstrating how the application continues to align with relevant planning policy and guidance. The key themes raised are as follows:

- Inappropriate development in the Green Belt;
- Landscape and Visual Impact;
- Heritage;
- Ecology and Biodiversity;
- Highways Impacts;
- Local Infrastructure and Community Facilities;
- Flood Risk and Drainage
- Housing Need, Density and Mix;
- Impact on Racecourse Industry; and
- Agricultural Impact.

Inappropriate development in the Green Belt

Public comments have raised concerns that the proposal comprises inappropriate development in the Green Belt, and that no Very Special Circumstances (VSC) have been demonstrated to outweigh this harm.

As outlined within the submitted Planning Statement, we firmly maintain the Site comprises Grey Belt land, and given the proposal complies with the Golden Rules as set out at paragraph 156 of the NPPF, there is no requirement for the scheme to demonstrate VSC.



Notwithstanding this, fifty-five market homes; fifty-five affordable homes; significant Public Open Space; PRoW connections; Economic Benefits; high quality design and biodiversity net gain are considered significant public benefits of the proposal which clearly outweigh any harm identified to the Green Belt, and any other harm. Given this test is passed, it demonstrates that VSCs do exist in this instance.

Comments received suggest the Site is identified in the Council's Green Belt Study as having high landscape and visual sensitivity, with development likely to result in a significant loss of openness. Objectors consider that the scheme would extend the urban edge in an unstructured manner and compromise the strategic function and integrity of the Green Belt in this location and would be contrary to paragraph 155(a) of the NPPF.

On this point, as set out in the supporting documents, as a result of the prevailing topographical and vegetated context, the Site represents a relatively discrete parcel of land within the wider Green Belt context. The GBA states that in terms of visual openness, rather than being a high functioning extensive part of the Green Belt which contributes highly towards the main function of keeping land 'permanently open', the Site, small in scale is enclosed by rising landform and woodland, influenced by existing adjacent residential built form and urbanising elements. Ebbisham Lane and the land to the south east proposed for biodiversity net gain act as defensible boundaries to contain the development from the wider Green Belt.

The Site is enclosed by rising landform and woodland, influenced by existing adjacent residential built form and urbanising elements. Furthermore, the submitted Green Belt Assessment sets out several mitigation measures which can be incorporated into the proposal to reduce harm to the Green Belt, including retention and enhancement of high-value landscape features; sensitive layout; boundary treatment and visual screening; and scale and form of development.

Sustainability

It has been suggested within letters of representation that the proposal would be in conflict with paragraph 155(c) of the NPPF which states that development in the Green Belt should be located sustainably. It has been argued that the development would lead to increased reliance on private vehicles, contributing to congestion and emissions, and that active travel options are constrained by topography and safety concerns.

The Site lies within walking distance of the built-up area of Langley Vale, which contains several facilities and amenities including the 'Park & Shop' petrol filling station convenience store (that has recently been approved for a large expansion (ref. 25/00052/FUL)), village hall, and Vale Primary School. These facilities are easily accessible on foot or by bicycle with future residents be able to walk/cycle to make school trips or pick up 'top-up' groceries at the garage.

Notwithstanding this, the proposals have sought to prioritise sustainable travel modes in place of private car trips thorough the introduction of a car club; the implementation of a Travel Plan; a contribution towards off site pedestrian improvements within Langley Vale (in particular the route to the Vale Primary School); and a contribution towards extending the Surrey Connect DRT service to cover Langley Vale which will provide future site users and existing residents with an on-demand public transport service which connects with Epsom and other destinations within the existing network. Fast electric vehicle charging points will also be provided for each new home. In considering the

proposed sustainable transport enhancements, regard should be had to paragraph 110 of the NPPF which sets out that *‘opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.’*

In addition, an enhanced sustainable transport strategy is also proposed for the scheme following recent discussions with SCC to further prioritise and maximise uptake of sustainable transport modes. This is in the process of being developed, but is expected to comprise:

- The potential for off-site cycle improvements on Langley Vale Road and Headley Road to improve connectivity to Epsom;
- The provision of vouchers to all new households to enable them to purchase e-bikes;
- Upgrades where feasible to the existing bus stops within Langley Vale; and
- Providing an additional car club vehicle within Langley Vale itself for convenient use by existing residents as well as new residents of the proposed development.

Affordable Housing

Certain objections argue that the proposed development would not meet the Golden Rules (para 156-157 of the NPPD) given that they consider the proposed 50% affordable housing is unlikely to be viable and may be reduced post-permission, undermining the scheme’s claimed benefits.

The affordable housing provision will be secured via a Section 106 Legal Agreement and is fundamental to the classification of the site as grey belt, and therefore the acceptability of the proposed development.

Summary

Overall, it has been acknowledged that the EEBC is unable to demonstrate a five-year housing land supply; however, it is argued that this does not override Green Belt protections, as confirmed by NPPF paragraph 11(d) and footnote 7. Objectors maintain that the site’s Green Belt status remains a clear reason for refusal, regardless of its size or perceived discreteness, and that the proposal fails to meet the exceptions outlined in paragraphs 155 and 156.

As outlined within the submitted Green Belt Assessment and Planning Statement and elsewhere in this letter, the proposal is not considered inappropriate development in the green belt by virtue of it utilising Grey Belt land and meeting the associated golden rules. The tilted balance is therefore correctly engaged in accordance with paragraph 11(d).

Landscape & Visual Impact

Comments note that the site lies within an Area of Great Landscape Value (AGLV), a locally designated area of high scenic importance that functions as a buffer to the nationally protected Surrey Hills Area of Outstanding Natural Beauty (AONB) and raise concerns that the proposals would fail to conserve and enhance valued landscapes and protect the borough’s distinctive character.

Furthermore, comments state that the introduction of a large housing development on a prominent green slope would urbanise the rural character of Langley Vale, resulting in visual intrusion. It is argued that the scale of development of 110 dwellings would significantly increase the village’s housing stock and erode the visual separation between Langley Vale and the Epsom Downs racecourse area.

The Site sits to the south of Langley Vale, and as such, the proposed development would not erode the visual separation between Langley Vale and the Epsom Downs racecourse which sits to the north.

Significantly increasing the Borough's housing stock is considered a significant benefit of the scheme, particularly in the context of EEDC having a very poor record of housing delivery and supply, with a HDT score of 38% and a current housing land supply position of 1.56-years.

Concerns are raised that the scheme would have a harmful visual impact on key receptors, including visitors to Epsom Downs, users of local footpaths and bridleways, and those approaching the village from higher ground. It is argued that landscaping proposals would take years to mature and could only partially mitigate the loss of openness. In addition, concerns have been raised that lighting from the development would introduce light pollution into a currently dark rural setting.

A Landscape & Visual Impact Assessment has been submitted in support of the application. The Assessment acknowledges that the proposed development will result in a permanent change to the sites current agricultural character, introducing built form to an otherwise undeveloped parcel of land. However, the scheme has been carefully designed to respond positively to the landscape setting and character of Langley Vale.

Over time, the maturing planting and landscape structure will successfully soften the visual impact of development and contribute positively to biodiversity and amenity. The proposal therefore has the potential to deliver notable landscape benefits, reinforcing the evolving character of Langley Vale in a manner that is consistent with local distinctiveness and long-term landscape objectives.

Whilst lighting detail will be provided at the reserved matter stage, any proposed lighting would be seen in the context of the adjacent development of Langley Vale and the adjacent residential development under construction to the south.

Objections also question the credibility of the submitted Landscape & Visual Impact Assessment, noting that key design elements such as siting, scale, and massing remain a reserved matter. It is argued that the assessment underestimates the likely harm, and that the visual impact should be considered significant.

The Land & Visual Impact Assessment sets out that a development can be sensitively achieved on site. The detail regarding siting, scale and massing and any subsequent landscape and/or visual impact will be considered at the appropriate time.

The lack of an Environmental Impact Assessment was also raised, however a request for a Screening Opinion was submitted, with the Council confirming the proposal did not constitute EIA development.

Heritage

Comments consider that development in this location would conflict with planning policies that seek to protect heritage assets and their settings and resist harmful development. It was also noted no reference has been made to the Grade II Listed wall forming part of the northern boundary with the Warren Woods.

The submitted Heritage Assessment identifies three Grade II Listed heritage assets, including the wall bordering the north, west and south sides of The Warren, a boundary wall to Woodcote Park, and a

Coal Tax Post south-east of Langley Bottom Farm, as the principal heritage assets of relevance to the proposed development.

The Heritage Assessment considers that these heritage assets have an important historical component to their heritage significance or are directly intervisible with the site. The impact of the proposed scheme upon the setting of these heritage assets has been considered, as has the resultant impact upon their heritage significance, with the Heritage Assessment concluding that the proposed development would have a neutral impact on the heritage significance of the identified heritage assets.

Furthermore, it has been raised that the location and size over (Over 0.4ha) of the Site triggers the need for an archaeological assessment. An Archaeology Assessment was submitted in support of the application which concludes that the site has a moderate/low-moderate potential for below-ground archaeological remains to be present and therefore recommends further archaeological work to establish the presence or absence of archaeological remains within the Site.

The Archaeology Assessment has been reviewed by the Archaeological Officer at Surrey County Council (SCC) who considers the assessment to be good quality and is in agreement with the findings contained within the assessment and recommends a condition to be attached to any planning consent.

Ecology & Biodiversity

It has been argued that that the proposal is not in compliance with adopted policies that require the protection and enhancement of biodiversity. It has been challenged that the farmland should not be regarded as having low ecological value, suggesting that adequate surveys ruling out ecological assets have not been provided.

As set out within the submitted Ecological Impact Assessment, site walkover surveys have been undertaken in 2019 and in May 2024, with a detailed botanical assessment undertaken in June 2024, to identify any rare arable plants associated with the SINC designation. The arable field is not presently managed sympathetically for arable plants. However, to compensate for this, the proposal includes the creation of a significantly larger area of suitable habitat for arable plants through the creation of cultivated, unseeded margins around a retained part of the field to the south. In addition, surveys relating to bats; reptiles; dormouse; breeding birds; badgers; and other notable species were undertaken.

It has been suggested that comprehensive species surveys (for bats, badgers, birds, reptiles etc) have not been completed in appropriate seasons, and that the absence of full data undermines the application. Specific reference is made to badger activity, with claims that recent evidence contradicts the applicant's ecological assessment. However, all surveys have been completed according to best practice, in line with guidelines produced by the Chartered Institute for Ecology and Environmental Management, Bat Conservation Trust, UK Habitat Classification Working Group and the Bird Survey and Assessment Steering Group.

The assessment of ecological impacts and mitigation recommendations follow CIEEM Guidelines.

Highways

It has been argued that the proposed development would generate a substantial number of vehicle movements, with objectors noting that the Transport Assessment (TA) under reports likely traffic

implications. It has been suggested that the rural road network, particularly Langley Vale Road and its connecting junctions, may be unable to accommodate the increase without adverse safety and congestion impacts.

The content of the TA has been informed by robust traffic and transport data collected in line with national and local guidance. The traffic assessment demonstrates that the proposal will generate approximately just one additional two-way vehicle movement per minute in the AM and PM peak hours, which is a negligible impact on the safety and operation of the local highway network. This position has been confirmed by highways officers at SCC who have raised no comments regarding the traffic impact of the proposed development.

It has been suggested that the proposed site access off Langley Vale Road could disrupt traffic flow and pose risks to vulnerable road users, including horse riders associated with nearby equestrian facilities.

This interaction between motor vehicles and equestrians has been thoroughly analysed, and whilst some localised delay does occur on Langley Vale Road whilst motor vehicles give way to equestrians entering the carriageway, however, the delay on average lasts for approximately 1-minute before conditions return to free flowing as equestrians leave the carriageway. Given the negligible additional vehicle movements resulting from the development, it is not considered that there will be a material change. In addition to this, the site access arrangements have been subject to an independent Stage 1 Road Safety Audit (RSA) which raised no safety concerns regarding the operational of the new site access junction. Highways officers at SCC have also raised no safety concerns regarding the operation of the site access junction and its interaction with pedestrians.

Concerns are also raised about parking provision, with objectors noting that up to 250 spaces may be required to meet borough standards under Policy DM37. It has been noted that insufficient parking could lead to overspill onto village roads causing obstruction.

Parking provision is a reserved matter. At the appropriate stage the proposed level of parking will be provided in accordance with EEBC's Parking Standards for Residential Development Supplementary Planning Document SPD.

It has been raised that the anticipated construction traffic is considered a significant issue. It has been noted that the single access route into Langley Vale could be overwhelmed during the build phase, and that a robust Construction Transport Management Plan is essential. A Construction Management Plan will be secured by way of condition.

Local Infrastructure & Community Facilities

It is argued that the proposal fails to demonstrate adequate service and community infrastructure, as required by policy. Concerns include insufficient school capacity, lack of local healthcare provision, and unresolved utility constraints (particularly water pressure and foul drainage).

It is expected that CIL contributions would go towards required infrastructure including education and healthcare provision in the usual way.

Regarding utilities, a pre-planning application was submitted to Thames Water in May 2025 to assess the capacity for foul water and clean water to serve the proposed development.

As set out within the submitted Flood Risk Assessment & Drainage Strategy, Thames Water confirmed that there was foul water capacity available for the proposed development of up to 130 homes. Similarly, Thames Water confirmed that they would have clean water capacity available to serve the first 100 units and have recommended a condition be attached to any future planning permission to ensure all water network upgrades required to accommodate the additional demand to serve the development have been completed to allow the development to be occupied.

Flood Risk & Drainage

It has been raised that in the absence of a detailed and robust drainage plan, the scheme may increase flood risk, contrary to planning policy. SuDS and sewer upgrades must be certain.

A Flood Risk Assessment and Drainage Strategy were submitted in support of the application. These have been reviewed by SCC as the Lead Local Flood Authority (LLFA), who have advised they are satisfied that the proposed drainage system meets the requirements set out in the relevant policy documents and are content with the development proposed, and have recommended a planning condition to be included in the event of planning permission being granted to ensure that the SuDS scheme is properly implemented, and maintained throughout the lifetime of the development.

The Environment Agency have also been consulted on the proposed development have advised they have no comments to make.

Housing Need, Density & Mix

It has been put forward that whilst EEBC housing need is acknowledged, there are significant issues with the proposed housing delivery on this Site in terms of density, mix and meeting local need.

Concerns are raised about the proposed density and design, with objectors noting that although the numerical density is modest, the layout may appear cramped and out of character in a rural-edge setting. The layout and design will be subject to a reserved matters application. However, whilst the Illustrative Masterplan is only Illustrative, the layout works well with the contours, and the use of smaller units allows it to respond to the changes in level without having to rely on a plethora of heavily engineered retaining structures.

Whilst the 50% affordable housing offer is in accordance with the NPPF Golden Rules and Local Plan Policy CS9, it is argued that delivery shared ownership and First Homes products may remain unaffordable for many local residents. It has been called for a greater emphasis on genuinely affordable rent and housing types that meet identified local needs.

In response to the above, the delivery of affordable housing and required mix/tenure split would be agreed with the Council and would form part of the Section 106 Agreement.

Impact on Racecourse Industry

It has been argued that the proposal would have a serious adverse impact on the operation of the local racehorse training industry, due to its proximity to key access routes and training areas on Epsom Downs. Specific reference has been made to increased traffic and pedestrian activity, particularly along Bridleway 127, as posing safety risks to horses and riders.

Given the proximity of various stables and gallops in relation to the Site, it is acknowledged that the surrounding highway and PRow network is utilised by equestrians. As outlined within the submitted TA, the level of interaction between equestrians and vehicle users on Langley Vale Road was assessed in detail, identifying that motor vehicles give way to equestrians entering the carriageway, and whilst this does lead to a short delay within the transport network, this is not significant. The safety implications between equestrian and vehicle interaction were also not raised by either the Stage 1 RSA of the site access arrangements or highways officers at SCC.

Additionally, as outlined above, the number of additional vehicle trips anticipated on the network within the AM and PM peak hours are not material.

With specific regards to Bridleway 127, it is accepted that there will be an increased use of this route by pedestrians and cyclists. However, this route is a designated National Cycle Route (NCR 22) and therefore is already well utilised by pedestrians/cyclists and the increased use from development trips will be negligible. Furthermore, access to Bridleway 127 from the development will be via the existing PRow network with routes that have adequate visibility and therefore equestrian users can be well seen by pedestrians/cyclists.

Agricultural Impact

It is argued that the proposed development threatens the continued operation of Langley Bottom Farm, a long-established and ecologically integrated farm that supports local food production, biodiversity, and conservation efforts in partnership with the Woodland Trust and the racehorse training industry.

An Agricultural Land Classification was submitted in support of the application which outlines that the economic benefits of the Site are limited to £593 per annum, and the food production benefits are negligible, at circa 3 tonnes per annum of wheat.

Regarding ecology, as outlined above, the ecological impacts on Site have been fully assessed, with mitigation and enhancement methods to ensure that the risk of ecological harm resulting from the proposal is not harmful. Furthermore, the development is able to demonstrate biodiversity net gain through the replacement of arable habitat with more ecologically valuable habitats.

Conclusion

We trust that the above sufficiently addresses the concerns that have been raised, however please do not hesitate to contact me should you have any further queries.

Yours sincerely



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