

PLANNING INSPECTORATE
APPEAL UNDER SECTION 78 OF THE TOWN AND COUNTRY PLANNING ACT 1990

SUMMARY PROOF OF EVIDENCE

JOHN MUMFORD MRTPI (RETIRED)

Chair, Langley Vale Action Group

Appeal Ref	APP/P3610/W/26/6006971
LPA Ref	25/00846/OUT
Site	Farm View, Langley Vale Road, Epsom, Surrey KT18 6AP
Rule 6 Party	Langley Vale Action Group (LVAG) 20 th August 2026

Summary

1. I am Chair of Langley Vale Action Group (LVAG), a retired Chartered Town Planner and formerly a member of the Royal Town Planning Institute. This Summary should be read with my full Proof of Evidence. My evidence addresses the planning consequences of Green Belt policy, landscape and visual matters, agricultural land, later badger evidence and the overall planning balance. Separate LVAG witnesses address locational sustainability and horse racing and training. I do not present myself as a transport, landscape, ecology or equestrian specialist.

2. LVAG accepts that the appeal site falls within the definition of Grey Belt. The principal Green Belt question is therefore whether all the requirements of Policy GB7 g. i-iv of the 2026 National Planning Policy Framework are satisfied. LVAG's case is that Policy GB7 g. iii is not met because Farm View is not a sustainable location for development of this scale. That issue is addressed in detail by LVAG's transport and locational sustainability witness.

3. In my planning judgment the Green Belt analysis must be undertaken sequentially. Grey Belt status does not itself make development appropriate. If Policy GB7 g. iii is not satisfied, the proposal does not benefit from the Grey Belt exception. The consequences for inappropriate development, Green Belt openness, countryside encroachment and the Policy GB6.2 balance then arise. The sustainable-location test should not be reduced to whether the highway network can accommodate the scheme or whether measures can be secured to encourage non-car travel. The practical question is whether future occupiers would have a genuine and realistic choice for ordinary day-to-day journeys.

4. Recent appeal decisions relied upon by LVAG illustrate that this is a fact-sensitive exercise. Kings Farm, Colney Street and Thornley Bank show circumstances in which Grey Belt sites nevertheless failed the sustainable-location test because non-car options were insufficiently practical or attractive. Beaconsfield reached the opposite conclusion where shops, services and public transport were readily accessible but was nevertheless dismissed because of significant visual harm from encroachment into open countryside. I rely on those decisions only for the assistance their reasoning provides; the Farm View appeal must be determined on its own evidence.

5. The appeal site comprises approximately 5.2 hectares of open agricultural land on sloping ground at the edge of Langley Vale, forming part of the transition to the wider countryside associated with Epsom Downs. The proposal would introduce up to 110 dwellings together with roads, parking, gardens, drainage infrastructure, lighting and associated domestic activity. That represents a permanent change in both spatial character and the experience of the site.

6. The signed Landscape and Visual Statement of Common Ground narrows a number of methodological issues but leaves material matters unresolved, including aspects of the visual material, mitigation, viewpoint assessment and whether sufficient land is available along the western edge to provide an adequate landscape buffer. I do not substitute my judgment for specialist landscape evidence, but as a planner I consider those unresolved matters important to whether development of this scale can be satisfactorily assimilated. Screening through planting is not the same as retaining

landscape character or Green Belt openness: planting may filter views over time, but it cannot recreate open agricultural land after residential development has been introduced.

7. If the sustainable-location requirement is not met, the physical and visual consequences for Green Belt openness become material to the inappropriate-development balance. The scheme would extend built development into land presently experienced as countryside beyond the settlement edge. In my planning judgment this is also relevant to Green Belt purpose (c), safeguarding the countryside from encroachment. Landscaping cannot remove the physical fact of that encroachment.

8. The scheme proposal records the permanent loss of approximately 2.6 hectares of Best and Most Versatile Subgrade 3a agricultural land, around 49% of the site. I do not suggest that this matter is determinative by itself, but it is a permanent and irreversible harm capable of forming part of the overall planning balance.

9. LVAG also relies on later documentary evidence concerning badgers. The Appellant's EclA records badger latrines in 2019 but states that no direct badger activity was identified in 2024 and that a sett within 30 metres of the site boundary was highly unlikely. Robert Shatwell, Chairman of the West Surrey Badger Group, subsequently recorded repeated field signs during 2025 and 2026 and, following his May 2026 inspection, what he considered to be an active multi-entrance sett. That evidence is supplemented by later night-camera material and adjoining-resident observations. Mr Shatwell is unable to attend the Inquiry for unforeseen medical reasons, so I do not adopt his specialist conclusions and recognise that the weight to be given to his written evidence is a matter for the Inspector.

10. The planning relevance of that later evidence is its chronology. It post-dates the ecological baseline relied upon by the Appellant and appears materially different from a position in which no direct activity was identified and a nearby sett was considered unlikely. I accept that badgers and setts do not automatically preclude development and that monitoring, mitigation and licensing may be available. The question is whether evidence already before the Inquiry should simply be deferred to pre-construction monitoring, or whether its implications for layout, avoidance and mitigation should be understood before the effects of the scheme are concluded to be acceptable.

11. LVAG acknowledges the important benefits of the proposal. These include up to 110 dwellings in a Borough without a five-year housing land supply and 50% affordable housing, comprising up to 55 affordable dwellings. I also recognise public open space, biodiversity net gain and the sustainable transport package, subject to the specialist evidence about their effectiveness and to distinguishing mitigation from genuinely additional benefits.

12. The overall balance depends materially upon the Inspector's conclusion on Policy GB7 g. iii. If the site is found sustainably located and the Green Belt requirements are satisfied, the Green Belt balance arises differently. If Policy GB7 g. iii is not satisfied, the proposal remains inappropriate development and harm to openness and countryside encroachment must be weighed with the other harms established by the evidence, including landscape and visual harm, locational sustainability and car dependence, adverse impacts upon the horse-racing and training industry, ecological effects including harm to the adjacent Ancient Woodland and the Woodland Trust's Langley Vale Wood and the permanent loss of agricultural land.

13. My conclusion does not depend upon minimising the housing or affordable-housing benefits, which I acknowledge are substantial. It depends upon applying the correct Green Belt policy sequence and then weighing the enduring harms against the benefits actually delivered. If, as LVAG's sustainability evidence contends, Policy GB7 g. iii is not met, I do not consider the Green Belt harm and other harms would be clearly outweighed so as to amount to very special circumstances. LVAG therefore respectfully asks that the appeal be dismissed.

John Mumford MRTPI (Retired)

Chair, Langley Vale Action Group
20th August 2026