

PLANNING INSPECTORATE

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

Appeal Reference: APP/P3610/W/26/6006971

LPA Reference: 25/00846/OUT

Farm View, Langley Vale Road, Epsom, Surrey KT18 6AP

20th August 2026

PROOF OF EVIDENCE OF PAT PHELAN

Racehorse Trainer and Stud Manager

HORSE RACING, RACEHORSE TRAINING AND EQUESTRIAN OPERATIONS

1. Introduction and Experience

1.1 My name is Pat Phelan. I am a racehorse trainer and stud manager with extensive practical experience of thoroughbred horses, stud management and racehorse training.

1.2 I was brought up on a National Hunt stud in the south of Ireland, where I gained practical experience of horses and the operation of a working stud from an early age.

1.3 In 1968 I enlisted as a Cadet and was commissioned as a Lieutenant in 1970. I served as an Army Officer for approximately 25 years, retiring with the rank of Commandant in 1993.

1.4 Following my military career, I worked in Japan as Manager and Trainer at a pre-training centre accommodating approximately 270 horses.

1.5 I returned to Ireland in approximately 2003/04. In 2004 I became Stud Manager at Highclere, where I first met Tony and Lesley Smith.

1.6 Through that association, I came to Ermyn Lodge in 2006, where I became involved in the racehorse training operation in Epsom.

1.7 Since that time, I have developed detailed practical knowledge of the Epsom training environment, including the operation of the Training Grounds and the management and movement of thoroughbred racehorses in training.

1.8 At Ermyn Lodge I have been responsible for, or involved with approximately 50 horses at any one time ranging from foals through racehorses to retired brood mares.

1.9 My evidence is based on my practical experience. I am not giving evidence as a highways engineer. My evidence concerns the operational realities of training and moving thoroughbred racehorses in the Epsom environment and the potential consequences of materially changing that environment.

2. Scope of My Evidence

2.1 I understand that Epsom & Ewell Borough Council has withdrawn its fourth reason for refusal relating to horses and the horse racing industry.

2.2 I also understand that Surrey County Council, as Local Highway Authority, and the Appellant have reached agreement on conventional highway-safety matters. LVAG has expressly acknowledged that position and does not suggest that SCC maintains an objection based upon existing accident or collision evidence.

2.3 My evidence addresses a different issue. It concerns the practical and operational interaction between a substantial new residential development and established routes used by thoroughbred racehorses travelling between training yards and the Epsom Training Grounds.

2.4 In my view, historic collision records do not, by themselves, answer the question of whether changing the nature and intensity of activity adjoining established racehorse movement routes would affect their future safe and practical operation.

2.5 My evidence should therefore be understood as evidence about the specialist racehorse-training environment rather than as a conventional highways-capacity or accident-analysis case.

3. Significance of the Epsom Racing and Training Industry

3.1 Epsom Downs Racecourse and the associated Training Grounds form an important and unusual concentration of racing and racehorse-training activity.

3.2 The Statement of Common Ground agreed between Epsom & Ewell Borough Council and Jockey Club Racecourses in February 2026 records that the racecourse and Training Grounds are of national significance and that Epsom is one of only two locations in the United Kingdom where a racecourse and racehorse training coexist.

3.3 The same document records that a number of racehorse training yards are located around the Training Grounds and are well placed to support their continuing use. It also records strong economic links between the training yards and Training Grounds.

3.4 In practical terms, the Training Grounds cannot be considered in isolation from the yards where horses are stabled or from the routes by which horses travel between the two.

3.5 The emerging Local Plan material recognises that the industry requires specialist supporting infrastructure, including horse walks, gallops, paddocks and other facilities. It also expressly identifies access routes between training yards and Training Grounds as Racehorse Movement Corridors.

4. The Epsom Training Grounds

4.1 The Epsom Training Grounds comprise approximately 250 acres of downland turf and woodland used for the preparation and training of racehorses.

4.2 The Economic Impact Report records that the Training Grounds serve as the base for 10 racehorse trainers. It records a monthly average of 135 horses in training in 2024 and describes the level of demand over the previous decade as relatively stable.

4.3 The continued use of the Training Grounds also supports employment and associated equine services, including veterinary services, farriers, feed suppliers and other businesses connected with racing and training.

4.4 From my own experience, the Training Grounds the training ground is essential for us to get our horses fit for racing. We do 4 lots per day with 1st lot at approx. 7.15 2nd lot about 8.30 etc.

Our only access to the main gallop is via Bridle way 127 If we cannot safely access the gallops safely our business cannot exist

4.5 Horses typically travel to and from the Training Grounds 4 times per day and the string can vary between 2 and 6 depending on rider availability

5. Economic and Operational Importance

5.1 I am aware of the Economic Impact Report prepared in relation to Epsom Downs Racecourse. I am not the author of that report and do not seek to give independent economic evidence.

5.2 I refer to it because it demonstrates the scale of the established industry whose operational environment is under consideration.

5.3 The report estimates that the Training Grounds themselves generate approximately £2.912 million of economic impact each year, through usage fees, direct and induced employment effects and operational expenditure.

5.4 The wider commercial impact associated with Epsom Downs Racecourse is estimated at approximately £56.18 million per annum.

5.5 The Council/Jockey Club SoCG also recognises strong economic links between training yards, Training Grounds and the long-term management of Epsom and Walton Downs.

5.6 In my experience, the movement of racehorses between the yards and the Training Grounds is therefore not an incidental recreational activity. It is part of the working infrastructure of an established professional racing industry.

6. Racehorse Movement Corridors

6.1 The February 2026 Council/Jockey Club SoCG defines Racehorse Movement Corridors as routes travelled by racehorses between training yards and the Training Grounds.

6.2 The proposed wording of Policy DM8 states that development should demonstrate that it would not adversely affect those corridors in terms of racehorse safety by reason of traffic generation or development design, and should provide mitigation where an impact arises.

6.3 I recognise that Policy DM8 is emerging policy and that its planning weight is a matter for the Inspector.

6.4 Its relevance to my evidence is that the Council and Jockey Club have formally recognised the existence and operational importance of these routes.

6.5 The agreed supporting text also acknowledges that there is potential for conflict between racehorses and other road users on parts of the movement network.

7. Bridleway 127 and the Appeal Site

7.1 Bridleway 127 is particularly relevant to this appeal.

7.2 The Epsom & Walton Training Grounds Management Board identified Bridleway 127 in its objection to the application as a vital link for trainers travelling to and from the Training Grounds.

7.3 From my own experience, in the past when I was riding I used the bridle way to access the gallops and now as a trainer I supervise our riding staff to safely access the gallops

7.4 Horses from Ermyn Lodge use bridle way 127 to access the main gallops

7.5 Where the route is used, it is typically used 4 lots per day with any number from 2 to 6 in the string.

7.6 The practical importance of Bridleway 127 to the training operation is that Bridle way 127 is our safest and most direct route to the gallops.

7.7 Particular locations or situations along this route where interaction with other users requires careful management include the most sensitive location on our route to the gallop is at the junction between the horse margin and bridle way 127

8. Characteristics of Thoroughbred Racehorses

8.1 Thoroughbred racehorses in active training are not comparable in temperament or management requirements to ordinary recreational riding horses.

8.2 In my experience fit race horses are very sensitive animals and react to noise sudden movements and particularly to lorries and trucks . if they get frightened and loose they can be a danger to themselves and the public.

8.3 Matters which can be relevant when moving horses include the reactions of racehorses to traffic bicycles can be different to riding school horses

8.4 When horses travel in strings horses like routine and there training environment is best served by not having to change their daily exercise by encountering a building site .

8.5 The Epsom & Walton Training Grounds Management Board similarly recorded its concern that racehorses can be sensitive and easily startled and that increased vehicle and pedestrian activity close to training routes could affect their safe and effective use.

9. Effect of the Proposed Development

9.1 The appeal proposal is for up to 110 dwellings.

9.2 Once occupied, the development would inevitably introduce additional residents and associated activity into the immediate locality.

9.3 LVAG's Statement of Case identifies additional vehicle movements, pedestrians, cyclists and recreational use of routes which are also used by racehorses.

9.4 I do not suggest that every additional vehicle, pedestrian, cyclist or dog creates an unacceptable situation, nor do I suggest that racehorses should have exclusive use of public routes.

9.5 My concern is the cumulative change to an established operational environment.

9.6 In particular, I am concerned about:

9.6(a) increased encounters between racehorse strings and other route users;

9.6(b) increased cycling and recreational use of Bridleway 127 and associated routes;

9.6(c) increased dog walking and other activity associated with a new residential population;

9.6(d) additional vehicle movements during the periods when horses travel to and from the Training Grounds;

9.6(e) unfamiliar users who may not understand how best to approach or pass a string of thoroughbred racehorses; and

9.7 In my opinion, the significance of those changes is that training racehorses is a game of fine margins and having to encounter the stress of a building site daily could render a horse uncompetitive

10. Historic Collision Evidence

10.1 I understand that the Transport Statement of Common Ground records no equestrian casualties within the periods analysed and that SCC does not maintain an objection on conventional highway-safety grounds. LVAG has acknowledged that position.

10.2 I do not dispute the recorded collision data.

10.3 However, in my opinion, the absence of recorded accidents under existing conditions does not establish that a material change to those conditions would have no operational consequence.

10.4 Existing trainers, riders and other regular users are familiar with the presence of racehorses and with the way in which horses are moved around Epsom.

10.5 The issue I ask the Inspector to consider is therefore whether introducing a substantial amount of new residential activity immediately adjoining established racehorse movement routes would materially change the practical conditions in which those routes operate.

11. Consequences for the Training Operation

11.1 The Epsom & Walton Training Grounds Management Board records that the Training Grounds support 10 trainers and approximately 150 racehorses and expresses concern that a reduction in safe operational capacity could discourage use of the Grounds and affect their long-term viability.

11.2 The Economic Impact Report similarly records 10 trainers and a substantial continuing horse population.

11.3 The Council/Jockey Club SoCG records that Epsom's training industry has undergone a prolonged period of gradual decline and identifies the maintenance of training yards and associated infrastructure as important to the continuing viability of the Training Grounds.

11.4 In practical terms, difficulties in moving racehorses between yards and the Training Grounds would affect training operations because of stress, horses need to cool down after vigorous exercise like any athlete. Returning from work via a building site could render them uncompetitive.

11.5 Such effects could influence decisions by trainers or owners because if a group of stables have below par performances then they will loose horses to other training areas and thus jeopardize the viability of Epsom downs training center

11.6 I do not suggest that this development alone would necessarily cause the Training Grounds to cease operating.

11.7 My concern is that the training industry depends upon a functioning network of yards, Training Grounds and access routes. Development which makes those movements materially more difficult or less predictable adds pressure to that system.

12. Proposed Mitigation

12.1 I have considered and feel that while you may be able to provide some help at the construction phase the additional 110 houses and through traffic would make movement of racehorses to and from the gallops almost impossible,

12.2 In my opinion those measures do not adequately address my concerns because the measures suggested do not satisfy the needs of the training community.

12.3 In particular, I consider that we need a secure walk way to and from the gallops where we do not have to and construction activity between the hours of 6 Am and 12 noon. The roads in the area are at capacity and an additional 110 houses and their cars would make early morning movement dangerous/ impossible

12.4 The emerging DM8 approach is relevant because it requires consideration not only of historic accidents but also of whether traffic generation and development design could adversely affect racehorse movements.

13. Conclusions

13.1 Epsom Downs Racecourse and the associated Training Grounds form a nationally significant racing and training environment. Epsom is one of only two locations in the UK where racing and racehorse training coexist in this way.

13.2 The Training Grounds remain an active facility supporting approximately 10 trainers and a substantial population of racehorses.

13.3 Their economic impact has been estimated at approximately £2.9 million per annum, quite apart from their wider sporting, cultural and operational significance.

13.4 The training operation depends not only upon the Training Grounds themselves, but also upon the yards, specialist infrastructure and routes by which racehorses travel between those yards and the Downs.

13.5 The importance of those routes has been formally recognised through the proposed Racehorse Movement Corridors. The agreed Council/Jockey Club material recognises both their function and the potential for conflict between racehorses and other users.

13.6 Bridleway 127 forms part of that operational environment and has been specifically identified by the Training Grounds Management Board as an important route for Epsom trainers.

13.7 I acknowledge the absence of an objection from SCC based upon conventional highway-safety or collision evidence.

13.8 My concern is instead that the appeal development would introduce a material change in the level and nature of activity immediately adjoining established racehorse movement routes.

13.9 Based upon my practical experience of racehorse training and the Epsom training environment, I consider that having to encounter a building site daily would put the viability of training racehorses from Ermyn Lodge in jeopardy.

13.10 In my opinion, the effect upon the established racehorse-training operation should be taken into account when the Inspector assesses the overall merits of the appeal.