REPORT

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-0001
Status:	Final/02
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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 I have over 30 years' experience in transport planning, specialising in the transport planning and assessment of new development. I have advised on a wide range of development proposals throughout the United Kingdom, including residential, commercial and mixed-use schemes. My experience includes the development of sustainable transport strategies and the design of pedestrian and cycle infrastructure.

1.1.4 I have experience of preparing and presenting transport planning evidence at planning appeals and public inquiries. Most recently, I gave evidence at the call-in inquiry relating to proposals for up to 2,150 residential units across two development sites in the London Borough of Hounslow (appeal references APP/F5540/V/21/3287726 and APP/F5540/V/21/3287727).

1.1.5 I am instructed by Langley Vale Action Group (LVAG) to give evidence on transport. My evidence is given in accordance with the guidance of my professional institutions, and the opinions presented are my true and professional opinions.

1.1.6 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).

1.1.7 My evidence addresses Reason for Refusal 1, that the site is in an unsustainable location. It principally concerns one question: whether the location gives future residents a genuine choice of transport modes for everyday journeys or leaves them dependent on the car. I also draw two further matters to the Inspector's attention at Section 8, relating to the effects on equestrian movements and drainage, whilst recognising the Council's withdrawal of Reason for Refusal 4 and Surrey County Council's highway safety position. For the Green Belt and landscape matters in Reasons 2 and 3, these are addressed by others for LVAG.

1.1.8 My evidence covers the matters agreed and in dispute (Section 2); pedestrian and cycle access to everyday services (Section 3); public transport services (Section 4); the Department for Transport Connectivity Tool (Section 5); the two Langley Bottom Farm appeal decisions (Section 6); the vision-led approach and future car use (Section 7); other matters (Section 8); and my conclusions (Section 9).

1.1.9 I am familiar with the site, having visited on 9th and 20th October 2025 to observe conditions during the peak traffic periods.

2 Matters Agreed and in Dispute

2.1.1 The Statements of Common Ground have narrowed the issues considerably.

2.1.2 In the Transport Statement of Common Ground, Surrey County Council as local highway authority and the appellant agree the technical highway matters: the site access and its visibility, the Road Safety Audit, junction capacity, the collision record, equestrian safety, and that the traffic impact on the network would be acceptable. Whilst I do not dispute those agreed matters, I do, from my own observations on site, draw two aspects to the Inspector's attention under Other Matters at Section 8.

2.1.3 Reason for Refusal 1 states: ***"The proposal 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, contrary to Sections 9 and 13 of the National Planning Policy Framework 2024, Policy CS16 of the Core Strategy 2007 and Policy DM10 of the Development Management Policies Document 2015."***

2.1.4 Referring the reason for refusal, Section 9 paragraph 110 of the 2024 National Planning Policy Framework (NPPF) 'Promoting sustainable transport' states that "*Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes*." While the document recognises that the ability to maximise sustainable transport solutions will vary between urban and rural areas, for development proposals paragraph 115 (a) says that "*sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location*."

2.1.5 Section 13 paragraph 155 (c) of the 2024 NPPF states that development within the Green Belt would "*not be regarded as inappropriate*" if *"the development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework.*"

2.1.6 If the site is not sustainably located, the scheme fails NPPF paragraph 155(c), and so paragraph 155 as a whole. My evidence is that the site is not a sustainable location for major residential development.

2.1.7 Epsom and Ewell Core Strategy (2007) Policy CS16 states that *"Encouragement will be given to development proposals and management policies which foster an improved and integrated transport network and facilitate a shift of emphasis to non-car modes as a means of access to services and facilities."*

2.1.8 The policy goes on to say that:

"In creating new places, highway design should ensure that the needs of vehicular traffic do not predominate to the detriment of other modes of travel or to the quality of the environment created. Development proposals will be required to be consistent with, and contribute to, the implementation of the Surrey Local Transport Plan and should:

- *minimise the need for travel, through measures such as travel plans or the provision or enhancement of local services and facilities;*
- *provide safe, convenient and attractive accesses for all, including the elderly and disabled, and others with restricted mobility"*

2.1.9 Furthermore, the policy states that *"All major developments should be well located for convenient access by non-car modes, including walking, cycling and high quality public transport."*

2.1.10 My evidence is that because of the site's location, its distance from everyday amenities, and the quality of the infrastructure that connects the site with these amenities, the site is not a sustainable location for development and the measures proposed to support access by non-car modes do not "*provide safe, convenient and attractive accesses for all*".

2.1.11 Policy DM10 of the Epsom and Ewell Development Management Policies Document (2015) refers to the 'Design Requirements for New Development (including House extensions)'. Part (x) of this policy asks to *"ensure that development incorporates an appropriate layout and access arrangements for servicing the completed development from adjoining highway and pedestrian networks"*.

2.1.12 My evidence is that reliance on the future use of unmade public rights of way for everyday journeys, and the distances that future site residents will be required to walk to access everyday services, is inappropriate will not encourage pedestrian trips.

2.1.13 It is noted that the reason for planning refusal makes refence to the 2024 edition of the NPPF, and the 2024 version of the NPPF is referred to in this document, unless otherwise stated.

3 Pedestrian and Cycle Access to Everyday Services

3.1 Distances to Local Amenities

3.1.1 The appeal site is green field land on the western edge of Langley Vale.

3.1.2 The village has a pre-school, a primary school, a village hall and a small convenience shop attached to the petrol filling station. It has no health facilities, no secondary school, no food store and little local employment, so residents must travel out for most everyday needs.

3.1.3 The distances agreed in the Transport Statement of Common Ground, measured from the centre of the developable area, show distances to other local amenities. Health, pharmacy and larger retail lie between about 2,880 metres (m) and 3,300m, and the nearest railway station, Tattenham Corner, is 2,900m.

3.1.4 The appellant's map from illustrating distances from the site to local amenities is provided in **Appendix AW1** and for ease of reference, distances from the centre of the site, as presented in the Transport Statement of Common Ground, are replicated in **Appendix AW2**. My evidence does not dispute these distances.

3.1.5 Of the 31 destinations listed **Appendix AW2**, 22 are located a walk distance of more than 2 kilometres (km), and 26 are located a walk distance of over 1km. Only three facilities are listed as being within 800m of the centre of the development site.

3.1.6 The Department for Transport's 2007 publication, Manual for Streets (MfS), refers to the concept of a walkable neighbourhood, stating in paragraph 4.4.1 that *"walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes' (up to about 800m) walking distance of residential areas…"* While MfS recognises that 800m is not an upper limit, the publication is now approaching 20 years old, and more recent and relevant guidance has since emerged. This newer guidance should be the primary reference point when considering a development's sustainability credentials.

3.1.7 Active Travel England (ATE) were established in 2022 as an executive agency of the Department for Transport, and they now provide the Government's primary guidance and oversight on active travel and sustainable development matters.

3.1.8 Paragraph 2.8 of Active Travel England's 'Standing Advice Note: Active travel and sustainable development' (October 2023) states that *"a mix of local amenities should be provided within an 800m walking distance of all residential properties or staff entrances for workplace facilities, while a bus stop with regular service(s) should be located within 400m. Local amenities may include but not be limited to a food shop, park or green space, indoor meeting space, primary school, post office or bank and GP surgery. All developments that include new dwellings should demonstrate how local schools, colleges and higher education institutions will be accessed by active travel modes."*

3.1.9 With reference to **Appendix AW2**, only the Texaco garage (excluding bus stops) is located within an 800m walk. Both bus stops referred to in **Appendix AW2** are beyond the stated 400m walk distance. The majority of facilities listed in **Appendix AW2** are located substantially beyond the 800m threshold stated in the ATE guidance.

National Planning Policy Framework, August 2026

3.1.10 The recently revised National Planning Policy Framework, published in August 2026, adopts around 800m as a reasonable walking distance for its policies on development around well-connected stations, and expressly recognises that topography, route availability and quality, and physical barriers may prevent or discourage walking over that distance. That 800m figure is applied to station proximity rather than to everyday amenity access. It is, however, consistent with the walkable-neighbourhood distance in the guidance referred to above, and the qualifications it attaches, on topography and route quality, are directly relevant to this site. The appeal site is not located within an 800m walk distance of a station.

3.2 Local Topography

3.2.1 The proposed point of access to the site from Langley Vale Road is at a low point and hills extend upward, both to the north and south of this location. The existing Langley Vale conurbation is also on an incline, with the heights increasing to the east of Langley Vale Road.

3.2.2 From my site visits, it is evident that journeys between the site and most local destinations would involve negotiating significant inclines. This is particularly apparent on routes towards local schools, facilities within Langley Vale and destinations both north and south of the site. The topography is a defining characteristic of the area and is readily experienced by those travelling on foot or by cycle.

3.2.3 Whilst some people will continue to walk and cycle regardless of gradient, steeper routes generally require greater physical effort and are less attractive for many users, particularly those undertaking everyday journeys, travelling with children, carrying shopping, or those with reduced mobility. In my opinion, the local topography is an additional factor that is likely to discourage a proportion of trips from being made on foot or by cycle and increase reliance on the private car.

Planning Application Reference 25/00052/FUL

3.2.4 The consented planning application for the convenience store at the Texaco petrol filling station (reference 25/00052/FUL) provides no cycle parking, on the stated basis that cycling to and from it would not be a realistic mode of transport (the associated extract from the Officer's report is provided in **Appendix AW3**).

3.3 Route Quality

3.3.1 The 2026 NPPF refers to route availability, quality or physical barriers as matters that are relevant to encouraging pedestrian movement. Route quality is also referred to by ATE in their Standing Advice Note: Active travel and sustainable development' (October 2023). Paragraph 2.10 of the Standing Advice Note states that as a minimum ATE expect walking routes to:

- *be 2m wide (with limited pinch points of 1.5m due to street furniture) and localised widening to accommodate peak usage;*

- *be step-free;*
- *have a smooth, even surface;*
- *be uncluttered;*
- *have street lighting; and*
- *include appropriate crossings in compliance with LTN 1/20 Table 10-2 and Inclusive Mobility.*

3.3.2 Paragraph 2.2.1 of the Transport Statement of Common Ground states that *"within the vicinity of the site, Langley Vale Road has a 1.0m to 1.5m wide footway on the eastern side."* For most of the route a narrow footway extends from the northern boundary of Langley Vale towards the Rubbing House public house and the Epsom Downs Racecourse Grandstand.

3.3.3 To the south of the proposed site access, an unmade pedestrian route runs parallel to Bridleway 146. While the bridleway is accessible to pedestrians, the parallel pedestrian route is available to pedestrians to minimise interaction with racehorses as they route to and from the gallops. This route provides a connection to the Langley Vale Road Pegasus crossing and is uneven and unlit.

3.3.4 The appellant refers to the availability of the local Public Right of Way (PROW) Network to support pedestrian trips to local facilities. While PROW routes are helpful and support leisure activity, these are unlit and many local routes are unmade, with an uneven surface. Images of the local PROW network are provided in the Transport Statement of Common Ground, within which it is acknowledged that PROW routes are *"not ideal for all scenarios when considering weather conditions and daylight during the winter months*". In this context, PROWS would support pedestrian movement for day-to-day activities on an irregular basis only and are not supportive of a year-round route for the school run, the commute or the weekly shop.

3.4 Summary

3.4.1 The evidence demonstrates that the appeal site is not located in a position that adequately supports active travel as a realistic means of accessing day-to-day services and facilities. The vast majority of local amenities are located well beyond the 800m walking distance identified in both Active Travel England guidance and the newly

published NPPF as a reasonable distance for regular pedestrian journeys. Of the 31 destinations identified within the Statement of Common Ground, only one non-bus stop facility lies within 800m of the site, while essential services such as healthcare, pharmacies, larger retail facilities and the railway station are between approximately 2.9km and 3.3km away.

3.4.2 The issue is not simply one of distance. The 2026 NPPF makes clear that topography, route availability, route quality and physical barriers are important considerations when assessing whether walking distances are reasonable. In this case, the site is affected by significant changes in level between the proposed access and many key destinations, with gradients involving level differences of 30m to 40m, or more. These conditions are likely to discourage many journeys on foot or by cycle, particularly for less mobile users, families with children, older people and those undertaking everyday trips carrying shopping or other items.

3.4.3 Furthermore, the quality of available walking routes falls short of the standards expected by Active Travel England. Footways are narrow in places, important pedestrian connections are unmade and unlit, and reliance is placed on Public Rights of Way that are primarily recreational in nature and are acknowledged to be less suitable during poor weather conditions and the winter months. While such routes may contribute to leisure walking, they cannot reasonably be relied upon to facilitate consistent day-to-day access to essential services.

3.4.4 Taken together, the combination of substantial distances to key destinations, challenging topography and substandard pedestrian route quality means that the site cannot be regarded as one that adequately supports active travel. In practical terms, future residents would be heavily reliant on the private car to meet many of their everyday needs. The location therefore performs poorly against the principles of sustainable and active travel set out in Active Travel England guidance and the National Planning Policy Framework.

3.4.5 In my opinion, the proposal is sited in an unsustainable location where the distance to local amenities, combined with the area's topography and the quality of available walking and cycling routes, fails to adequately support active travel. The proposal would not provide realistic walking and cycling opportunities, resulting in an excessive reliance upon private car usage for a significant proportion of everyday journeys.

4 Public Transport Services

4.1 Bus Services

4.1.1 The nearest bus stop is on Grosvenor Road, about 410m from the centre of the developable area, with a second on Rosebery Road at about 610m. Both are served by three bus services, the E5, 408 and 618.

4.1.2 Measured from the centre of the site, the bus stops sit beyond the 400m walk distance set out by ATE. The walk distance to these stops will be greater than 410m and 610m for residents located beyond the centre of the developable area.

4.1.3 The E5 is the most frequent bus service, running between Langley Vale and Epsom approximately once every two hours on weekdays and Saturdays, with no Sunday service. The 408 calls once a day, and the 618 operates only during school term times.

4.1.4 **Appendix AW4** presents an extract from a London Assembly Q&A session (May 2025), which sets out TfL's definition of a high-frequency service for which passengers are assumed to arrive at a bus stop without the need to consult a timetable. The extract confirms a 12-minute service frequency constitutes a high-frequency service for which passengers can ‘turn-up-and-go’. It is recognised that the site falls outside of Greater London and the E5 bus service is not operated by TfL, and this extract is provided to demonstrate what a ‘turn-up-and-go’ bus service would require in terms of service frequency. The E5 service falls well short of this standard.

4.1.5 Service frequency is important, as is service reliability. The E5 bus service connects Langley Vale with Epsom town centre and its railway station. Epsom is the primary conurbation served by the E5 and is likely to be the destination for a high proportion of Langley Vale bus users. Those using the E5 service to connect with rail services at Epsom station rely on a punctual service, and the frequency of the existing route is such that missing a bus that runs infrequently can result in a wait for the following service that is impractical for those travelling to work or attending an appointment.

4.1.6 The appellant is offering a package of measures, secured by obligation, to improve bus accessibility to the site. I do not dispute that these measures would be secured and implemented. The question is whether they are sufficient to provide site residents with a genuine and enduring choice of travel mode. In my opinion, they are not.

4.1.7 The main measure is a contribution of £200,000 a year for five years, to extend the demand-responsive Surrey Connect service, a pre-booked minibus, or to improve the frequency of service for route E5. The funding is finite: after five years there is no secured service.

4.1.8 The appellant may say the service will be commercially viable by then, but patronage built into a car-dependent location with more than one parking space per home is unlikely to sustain it. And a pre-booked minibus, running set hours and not on Sundays, is not the 'turn-up-and-go' service that would change behaviour.

4.1.9 A measure of bus use can be gained form a review of the 2011 Travel to Work Census data for output area Epsom and Ewell 009E, in which the site is located. As presented within Section 7 of ITP's Transport Review (October 2025), submitted to Epsom and Ewell Council in connection with application 25/00846, the Census presents the proportion journeys to work undertaken by car and by non-car modes. The data is presented in **Appendix AW5**.

4.1.10 The data indicates that around 1% of travel to work journeys are undertaken by bus. This is a low baseline and while a more frequent bus service would support bus use, the baseline is so low that even if bus use doubles, the mode share would remain very low and not indicative of a sustainable development location.

4.1.11 When referring to 2011 'travel to work' Census data, the data provides the main mode of transport used for the longest part, by distance, of a journey. It may not mean that the journey form Langley Vale is by bus and could mean that an alternative mode was used to depart Langley Vale, and a bus used as a later part of a multi-stage trip.

4.1.12 The 2021 census was undertaken in conflict with a Covid-19 pandemic lockdown. **Appendix AW5** also presents 2021 'travel to work' census for completeness, and this also indicates a 1% bus mode share.

4.1.13 It is my opinion that bus services do not provide a realistic alternative to private car use for future residents of the site. The nearest bus stops are beyond the walking distance recommended by Active Travel England, and the existing bus services are infrequent, limited in their operating hours and, in some cases, operate only on a restricted basis.

4.1.14 While the appellant proposes measures to improve bus provision, these are dependent upon time-limited funding and do not guarantee the long-term availability of an attractive, frequent and reliable service.

4.1.15 The available evidence indicates that bus use from this area is currently very low and there is no clear basis to conclude that the proposed measures would materially alter travel behaviour. Consequently, I consider that future residents would remain heavily reliant on the private car for day-to-day journeys, and that bus accessibility should attract limited weight in support of the sustainability credentials of the proposed development.

4.1.16 While a £200,000 a year contribution to support an improved bus service is welcomed, this is an ordinary measure that could be expected of any development of this size. The measures are time-limited and given the low baseline bus mode share, it is unlikely that revenue generated from the measure will be sufficient for this to run, in perpetuity.

4.1.17 The travel patterns generated by the development would persist indefinitely and it is my opinion that temporary measures cannot overcome the site's inherent accessibility constraints or materially reduce long-term reliance on the private car.

4.2 Rail Services

4.2.1 The nearest railway station to the appeal site is Tattenham Corner Railway Station, located approximately 2.9 kilometres from the site. This station is not accessible by bus from Langley Vale.

4.2.2 In my opinion, the distance between the appeal site and Tattenham Corner Railway Station raises significant questions as to whether walking would represent a realistic and attractive travel option for future residents. The journey would exceed 30 minutes and would require pedestrians either to use a combination of public rights of way, including unmade and unlit routes through woodland and across the racecourse, or to travel via the highway network and its associated topography. The route to the station cannot be regarded as suitable for all potential users. Consequently, I do not consider the station to provide a genuine alternative to private car use for many day-to-day journeys, particularly for those commuting by rail.

4.2.3 This conclusion is reinforced by the appellant's own Transport Assessment, which states at Paragraph 4.3.3 that the *"local Railway can be accessed by a short car-based journey"*. In my view, this acknowledgement demonstrates that access to rail services is, in practice, reliant upon the use of a private vehicle.

4.2.4 Furthermore, once residents have commenced their journey by private car there is an increased likelihood that they may choose to continue directly to their final destination rather than transfer to rail services. As such, the location of the site is unlikely to promote a significant reduction in private vehicle dependency.

4.2.5 On access to railway stations, reference can be made to the Epsom and Ewell Local Plan Regulation 18 Transport Assessment, which reviewed the accessibility of potential development sites in the Borough. The Transport Assessment identified three sites as being the worst performing for access to stations, including the 'Land North of Langley Bottom', the appeal site. Table 24 of the Transport Assessment refers to the walk time to station being in excess of 30 minutes, the cycle time being 10 to 15 minutes and the public transport journey time being 20 to 25 minutes.

4.2.6 The Regulation 18 Transport Assessment (October 2024) also states that cycle times to town and secondary centres are within a 10-minute one-way journey from all allocation sites, apart from Land North of Langley Bottom Farm and that Langley Bottom Farm was the worst performing of all sites reviewed in terms of the pedestrian connections to a pharmacy. The associated extracts from the Epsom and Ewell Local Plan Regulation 18 Transport Assessment are presented in **Appendix AW6**.

4.2.7 Cycling represents a further potential means of accessing local railway stations; however, in my opinion, the attractiveness and practicality of cycling are constrained by both the local topography and highway conditions. Travel from Langley Vale towards surrounding destinations involves negotiating notable gradients, which can increase physical effort and reduce cycling speeds. In addition, cyclists travelling on Langley Vale Road are required to share carriageway space with motor vehicles.

4.2.8 To the north of the appeal site, Langley Vale Road is approximately 6.5 metres in width. In my observations, the carriageway is insufficiently wide to comfortably accommodate a motor vehicle overtaking a cyclist whilst maintaining appropriate separation distances

when opposing traffic is present. It is common for vehicles to remain behind cyclists, particularly on uphill sections where cycling speeds are reduced, until there is a suitable gap in opposing traffic. The combination of constrained carriageway widths, gradients and interactions with motor traffic is likely to reduce the attractiveness of cycling for many potential users.

4.2.9 The limited suitability of cycling as a regular mode of travel is reflected in the 2011 Census Travel to Work data presented in **Appendix AW5**, which identifies a cycling mode share of only 2% within the local area. In my view, this provides further evidence that cycling is not an established or attractive transport choice for the majority of local journeys.

4.2.10 Taking these factors together, it is my opinion that the site's location, topography and available transport infrastructure are not conducive to encouraging cycling for regular day-to-day journeys. Consequently, I do not consider that cycling is likely to provide a realistic or attractive means of accessing local railway stations for a significant proportion of future residents, nor is it likely to generate a substantial number of cycle-based trips more generally.

5 Department for Transport Connectivity Tool

5.1.1 Surrey County Council's statutory consultation response (dated 10th November 2025) to application 25/0846/OUT, as the Highway Authority, objected to the development on sustainability grounds. The objection refers to the Department for Transport (DfT) Connectivity Tool, stating that the *"Connectivity Index (released only to Local Authorities at the moment) 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 for a location so near to London and its suburbs around Epsom. The developer has not demonstrated that through investment in bus service provision, and cycle and pedestrian infrastructure, they can secure a step change improvement to this very poor level of accessibility as currently exhibited, so the site is likely to remain almost entirely reliant upon the private car, and unable to prioritise sustainable transport modes. Unless the measurement of connectivity can be significantly improved to a level approximately above a score of 70 which falls within the 60th to 100th percentile range, the County Council remain of the view that the location should not serve a significant increase in residential development."*

5.1.2 It is agreed that being within the bottom 15th percentile of the population of England and Wales represents a very poor level of accessibility. In my opinion, the proposal to provide £200,000 per year for five years to support additional bus services does not deliver the *"step change"* that the Highway Authority has stated is necessary to make the development sustainable.

6 Langley Bottom Farm Appeal Decisions

6.1.1 The appellant relies on two decisions at Langley Bottom Farm, the 2022 decision (APP/P3610/W/21/3280881) and the 2025 decision (APP/P3610/W/25/3359376), as evidence that this is a sustainable location. Neither supports a scheme of this kind.

6.1.2 Langley Bottom Farm abuts the appeal site and matters associated with site accessibility at Langley Bottom Farm are relevant to the appeal site.

6.1.3 The 2022 decision allowed 20 dwellings. Whether the site was in a sustainable location with access to a choice of modes of transport other than the private motor vehicle was one of the appeal's main issues. On this matter, paragraph 23 of the appeal decision states that *"Given the location of the site, and the relatively infrequent nature of bus services to Epsom, where there are a greater number of facilities, services and employment opportunities,* ***it could not be reasonably said that the appeal site is in an exceptionally accessible location. Indeed, I find that it is very likely that there would be reliance placed on the use of the private motor vehicles for a high proportion of trips to and from the site****. However, the evidence is that the appeal site includes land used for a mixture of both agricultural and other commercial activities and hence some trips to and from the site already take place using private motor vehicles."*

6.1.4 While the Inspector allowed the appeal, this was in the context that the proposals did *"not quite meet the threshold for being 'significant' development"* (APP/P3610/W/21/3280881 appeal decision, paragraph 31).

6.1.5 The appeal site proposed residential development on open land, and there are no agricultural and other commercial activities that can offset the traffic impact of the new development. Furthermore, the appellant's proposals are significant, with a substantially higher travel demand than those associated with planning appeal APP/P3610/W/21/3280881.

6.1.6 It is my opinion that the view expressed in paragraph 6.1.3 is relevant to the appeal site in that it cannot be reasonably said that the appeal site is in an exceptionally accessible location, and it is very likely that there would be reliance placed on the use of the private motor vehicles for a high proportion of trips.

6.1.7 The 2025 planning appeal was associated with the development of a single dwelling in place of the ruins of the 1900s farm house at Langley Bottom Farm and was dismissed. The 2025 decision does not assist on transport.

7 Vision-led Approach and Trip Generation

7.1.1 The appellant's Transport Assessment describes its approach as vision-led. That means setting the outcomes for a place first and providing the transport to deliver them, rather than predicting demand and providing for it. I do not criticise the vision-led approach; however, this scheme does not apply it.

7.1.2 The Transport Assessment's own vision is qualified at the outset (extract within **Appendix AW7**), to prioritise sustainable travel "where practicably possible" given the location and quantum. That concedes the point. A vision-led scheme changes what the location offers; it does not subordinate the outcome to what the location already allows.

7.1.3 The consequence is in the figures. The appellant's Transport Assessment applies a 10 per cent reduction in vehicle trips to reflect an assumed shift to sustainable modes. For the reasons in Sections 3 and 4, that shift has no secure basis.

7.1.4 On the appellant's own figures, the car dominates. The Transport Assessment's trip generation indicates a car mode share of roughly 69 per cent in the morning peak and 81 per cent in the evening peak. The 2011 Census travel-to-work data for the area (**Appendix AW5**) shows 73 per cent driving, and the figure at the site is likely higher once car trips to the station are counted.

7.1.5 High car use is consistent with local car ownership, about 1.85 vehicles per household at the 2021 Census (Output area Epsom and Ewell 009E - **Appendix AW8**).

7.1.6 There is a direct relationship between car parking, car ownership and car use. Evidence of this was submitted by TfL in connection with the 2021 London Plan within their Residential Car Parking document (December 2017 – report extract provided in **Appendix AW9**).

7.1.7 Paragraph 6.5.1 of the submitted Transport Assessment refers to the proposed development being supported by car parking that would align with Epsom and Ewell's Parking Standards for Residential Development Supplementary Planning Document (SPD). These standards are provided in Table 6.1 of the Transport Assessment and the associated report extract is provided in **Appendix AW10**. These minimum standards allow for at least 1 space per unit for one and two bedroom properties, up to at least 3 spaces per dwelling for four bedroom houses. All proposed dwellings will have provision for storing a car at their property.

7.1.8 This level of car parking and car ownership will lead to car use. In my opinion, the site's location and its insufficient public transport connections will mean cars will dominate.

7.1.9 I do not dispute the agreed conclusion that the traffic impact on the network would be acceptable. That is a different question. A development can have an acceptable network impact with car use being the main mode of travel. The issue under Reason 1 is not that the roads cannot cope, but that the location leaves no realistic alternative to driving and the parking provision on-site will both encourage car ownership and the use of the car.

8 Other Matters

8.1 Introduction

8.1.1 I recognise that the Transport Statement of Common Ground records agreement between Surrey County Council and the appellant on matters of highway safety. Without seeking to disturb that agreement, I draw the Inspector's attention to two matters arising from my site visits, photographs of which are provided in **Appendix AW11**. I also comment on the wider package of measures that are defined within the Transport Statement of Common Ground to support sustainable travel.

8.2 Interaction with Horses

8.2.1 The first concerns the interaction between new development-related movements and horses. The site lies on established racehorse movement routes, with horses using Langley Vale Road on a daily basis. The development would introduce additional vehicular movements and a new access junction to a road used daily by horses.

8.2.2 I would also refer to the recent Statement of Common Ground between Epsom and Ewell Council and the Jockey Club in connection with the new Epsom Local Plan, and the proposed Racehorse Movement Corridor designation contained on the proposals map, which includes Langley Vale Road.

8.2.3 Without reopening the agreed position on highway safety, I draw this interaction to the Inspector's attention as a matter that may be weighed; the racing and equestrian effects are addressed more fully by other LVAG witnesses.

8.3 Highway Drainage

8.3.1 The second matter relates to surface water. Langley Vale Road, in the vicinity of the proposed site access, is subject to recurring surface water ponding, which I observed on 20 October 2025 and which is illustrated in **Appendix AW11**. The local topography indicates that the proposed access road would rise from Langley Vale Road, with the potential for surface water to drain back towards the low point, exacerbating the existing problem.

8.3.2 Whilst drainage matters may be capable of resolution through detailed design, the presence of standing water at this location, on a carriageway used by motorists, cyclists and horses, is relevant to the attractiveness and likely comfort of active travel modes and is therefore a matter that the Inspector may wish to take into account.

8.4 Package of Measures

8.4.1 With reference to Section 7 of the Transport Statement of Common Ground, I agree that the listed Planning Conditions are typical and necessary to support the development.

8.4.2 Section 7.3 of the Transport Statement of Common Ground refers to the provision of £200,000 per annum for five years to support bus service frequencies and this matter has already been discussed within this evidence.

8.4.3 In addition to the above, two car club parking spaces are requested, to be provided for a minimum of three years alongside electric vehicle charging points for the use by these vehicles. The car club is required to be in situ for a minimum of three years, with free membership for site occupiers, who would receive £50 worth of driving time credit.

8.4.4 This proposal does not present a compelling case for the provision of a car club as either a sustainable transport measure or as mitigation for the development's transport impacts. Car clubs are generally most effective in locations where residents have realistic opportunities to live with reduced levels of private car ownership, typically supported by high-density development, excellent public transport accessibility, limited private parking provision and parking restraint measures; locations that encourage car free living. In contrast, the proposed development is located in an area where private vehicle use is likely to remain the dominant mode of travel and where every dwelling is provided with sufficient on-site parking to meet likely car ownership levels. As such, future residents will already have the ability and incentive to own and park private vehicles, significantly reducing any likely demand for a shared car club vehicle.

8.4.5 It is unclear how the proposed car club would deliver meaningful sustainable transport benefits. The development would provide parking provision that meets Council's standards and proposes no measures to discourage private car ownership or use. As a result, the car club would operate alongside, rather than substitute for, private vehicle ownership.

8.4.6 Given the level of on-site parking proposed, there is doubt as to whether sufficient demand exists to support a viable car club over the required three-year period. Future residents will have dedicated parking provision available, and the applicant has not demonstrated why they would choose a shared vehicle service instead. Consequently, insufficient evidence has been provided to justify the necessity or effectiveness of a car club in this location, and limited weight should be given to it as a mitigation measure or sustainability benefit of the scheme.

9 Conclusions

9.1.1 The principal issue addressed by my evidence is whether the appeal site is located in a position that would provide future residents with a genuine choice of transport modes for everyday journeys, consistent with the requirements of the National Planning Policy Framework, Core Strategy Policy CS16 and Development Management Policy DM10. Having reviewed the site, the appellant's transport submissions to planning application 25/00846/OUT, the Transport Statement of Common Ground and the relevant policy and guidance documents, it is my professional opinion that the site is not a sustainable location for major residential development.

9.1.2 The evidence demonstrates that the majority of day-to-day services and facilities required by future residents are located well beyond distances that current national guidance identifies as reasonable for regular walking trips. Essential destinations, including healthcare facilities, pharmacies, larger retail facilities, employment opportunities and rail services, are generally located between approximately 2.9km and 3.3km from the site. The only listed destination within an 800m walk distance (excluding bus stops) is the Texaco petrol station and shop, and as such facilitates are generally located well beyond the 800m walking distance that is considered acceptable by Active Travel England and the newly published National Planning Policy Framework.

9.1.3 The limitations of the site are not confined to distance alone. The local area is characterised by challenging topography, with significant level changes between the site and key destinations.

9.1.4 The quality of the available walking environment is diminished by reliance on public rights of way that are unlit, offer little natural surveillance and are principally intended for recreational use. These routes are acknowledged to be less suitable during poor weather conditions and periods of winter darkness. In my opinion, their characteristics significantly reduce the appeal and practicality of walking and cycling for everyday journeys, increasing the likelihood that future residents would instead rely on the private car.

9.1.5 Public transport accessibility is similarly limited. The nearest bus stops lie beyond the 400m walk distance recommended by Active Travel England and are served by infrequent bus services which do not provide the type of reliable, high-frequency public transport that is capable of materially reducing dependence on the private car. While I acknowledge the appellant's proposed package of bus-related mitigation measures and financial contributions, these measures are temporary in nature and do not overcome the site's inherent locational disadvantages. As evidenced by Census data, the base level of bus use for Langley Vale is very low and there is insufficient evidence to demonstrate that they would deliver a lasting and meaningful shift in travel behaviour.

9.1.6 The nearest railway station is approximately 2.9km from the site and, in practical terms, is unlikely to be accessed on foot by a significant proportion of residents. Indeed, the appellant's own evidence recognises that rail services are likely to be reached by means of a car-based journey. Cycling is similarly constrained by gradients, highway conditions and the absence of attractive dedicated infrastructure. Consequently, neither rail nor cycling can reasonably be regarded as providing a realistic alternative to private car use for a substantial proportion of everyday journeys.

9.1.7 The concerns regarding the sustainability of the site are reinforced by Surrey County Council's assessment of connectivity, which identified the site as performing poorly in comparison with locations across England and Wales, and by previous appeal decisions which recognised the area's limited accessibility and likely dependence on private motor vehicles. Whilst I acknowledge that the technical highway impacts of the proposal are agreed to be acceptable, that is a separate matter from the question of whether the site is sustainably located. A development may have an acceptable traffic impact on the highway network whilst still failing to provide residents with a genuine choice of transport modes.

9.1.8 Taking all matters together, I conclude that future residents of the proposed development would be heavily dependent upon the private car for a substantial proportion of their everyday journeys. The development would not provide a genuine choice of transport modes, would not prioritise sustainable transport in accordance with national and local policy, and cannot properly be regarded as being located in a sustainable location.

9.1.9 In my opinion, the proposal therefore conflicts with the objectives of 2024 NPPF paragraphs 110 and 115. As a consequence, it also fails to satisfy the requirements of NPPF paragraph 155(c), which requires development in the Green Belt to be located in a sustainable location with particular reference to those provisions. The proposal would therefore not benefit from the exception identified in paragraph 155(c).

9.1.10 For these reasons, I conclude that the proposal conflicts with national and local transport policy and supports the Council's position in relation to Reason for Refusal 1. I respectfully invite the Inspector to dismiss the appeal.

10 Principal Documents Referred To:

- Transport Statement of Common Ground [Final], i-Transport (31st July 2026)
- Epsom and Ewell Borough Council Decision Notice – 25/00846/OUT
- National Planning Policy Framework (December 2024)
- Epsom and Ewell Core Strategy (2007)
- Epsom and Ewell Development Management Policies Document (2015)
- Manual for Street (Department for Transport, 2007)
- Active Travel England Standing Advice Note: Active travel and sustainable development (October 2023)
- National Planning Policy Framework (August 2026)
- Officer report, application number 25/00052/FUL (Epsom and Ewell)
- London Assembly Mayoral Questions – Bus Ridership in London (May 2025) - https://www.london.gov.uk/who-we-are/what-london-assembly-does/questions-mayor/find-an-answer/bus-ridership-london
- Review of Planning Application 25/00846 – Transport Review (ITP, October 2025)
- Epsom and Ewell Local Plan Regulation 18 Transport Assessment (October 2024)
- Appeal Decision APP/P3610/W/21/3280881, Langley Bottom Farm, Langley Vale Road, Epsom.
- Appeal Decision APP/P3610/W/25/3359376, Langley Bottom Farm, Epsom.
- Surrey County Council Statutory consultation response to application EP/25/0846, dated 10th November
- I-Transport Framework Travel Plan
- Residential Car Parking, Part of the London Plan evidence base December 2017 (Transport for London)
- Statement of Common Ground between Epsom and Ewell Council and the Jockey Club – Epsom and Ewell Local Plan 2040 (February 2026)

Appendix AW1: Local Amenity Accessibility plan from the appellant's Transport Assessment (June 2025), Image 4.5

i-Transport

Langley Bottom Farm

Figure 2.1: Local Amenities Plan | ITB200788

Key

- Site Location
- Tattenham Corner
- Epsom Downs
- 1 Langley Vale Village Hall
- 2 Langley Vale Centenary Wood
- 3 Epsom Downs Racecourse
- 4 Derby Arms Public House
- 5 Tattenhams Library
- 6 Woodcote Park Golf Club
- 7 Downswood Lawn Tennis Club
- 8 Epsom Golf Course
- 9 Tadworth Leisure and Community Centre

- 1 Paydnes Pharmacy
- 2 Tattenham Health Centre
- 3 Buckley Pharmacy
- 4 Tudor House Dental Practice
- 1 Texaco Garage
- 2 Post Office
- 3 Co-op Local
- 1 The Vale Primary School
- 2 City of London Freemen's School
- 3 St Giles C of E Infant School
- 4 Epsom Downs Primary School

Catchments

- 0m-800m
- 800m-1,600m
- 1,600m-3,200m

0 0.95 1.9 km

Appendix AW2: Transport Statement of Common Ground – Agreed Walk Distances

Extract from Transport Statement of Common Ground (Table 2.3)

Facilitiy Type	Destination	Distance from Centre of Site (m)
Education	The Vale Primary School	1,180
	City of London Freemen's School	2,470
	St Giles C of E Infant School	2,730
	Epsom Down Primary School	3,640
	Rosebury School	3,720
	The Beacon School	5,070
Retail	Texaco Garage	330
	Morrisons Daily Post Office	2,880
	Co-Op Local	3,000
	Epsom Town Centre	3,700
Leisure	Langley Vale Village Hall	820
	Langley Vale Centenary Wood	1,200
	Derby Arms Public House	1,850
	Epsom Downs Racecourse	1,890
	Woodcote Park Golf Club	2,400
	Downswood Lawn Tennis Club	2,650
	Tattenhams Library	2,960
	Tadworth Leisure and Community Centre	3,500
	Epsom Golf Course	3,650
Healthcare	Paydnes Pharmacy	2,880
	Tattenham Health Centre	3,000
	Buckley Pharmacy	3,000
	Tudor House Dental Practice	3,050
	Epsom Hospital	3,300
Transport	Grosvenor Road Bus Stop	410
	Roseberry Road Bus Stop	610
	DDRT Stop (Headley Road)	940
	Tattenham Corner Railway Station	2,900
	Epsom Downs Railway Station	3,800
	Epsom Railway Station	4,000
	Ashtead Railway Station	4,200

Appendix AW3: Extract from Officer's Report – Application number 25/00052/FUL – Reference Paragraph 7.12

7.6. Potential increases over permanent car parking capacity will be compensated by the petrol parking and electric charging bays when required and it is not anticipated that the proposals will adversely strain the on-street surrounding parking network.

7.7. EV charging

7.8. The proposal will provide four new electric vehicle charging bays in the north-east corner of the site as well as associated infrastructure including LV panels and power packs.

7.9. The dual fuel strategy for the site is considered proportionate to meeting customer needs and highly merited for encouraging people to use more sustainable modes of transport, and reliance on fossil fuels in the future. Specifications and details for EV charging infrastructure will be required under building regulations.

7.10. Cycle Parking

7.11. Policy DM36 of the DMPD requires the provision of cycle networks, facilities, and Policy DM37 requires minimum provision of cycle storage as set out in Annexe 2 - Parking Standards for new development.

7.12. No cycle parking is to be provided for this development. However, given the nature of the site, its location, and use, cycling too and from the site would not be a realistic mode of transport. As such, there is no requirement for cycle parking.

7.13. Pedestrian and Vehicle Access and Manoeuvrability

7.14. Paragraph 115 of the NPPF 2024 requires safe and suitable access, paragraph 116 allows for refusal where there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe and paragraph 117 seeks to minimise conflicts between pedestrians, cyclists, and vehicles. This is reinforced in Policy CS16 of the CS and DM10(x) of the DMPD.

7.15. The existing two crossovers onto the highway are to be retained and will not be altered. The Highway Authority have assessed the proposals on policy and safety grounds and raise no objection to the existing arrangement.

7.16. Servicing

7.17. Policies DM32 and DM38 of the DMPD aims to ensure that rear servicing is provided or retained in new development. Where it is not possible or practical, alternative solutions must not cause highway obstruction.

7.18. The rear serving area is located on the southern side of the site in the same location as the existing vehicle service yard. A replacement access gate will be constructed in the same location as the existing which will not cause obstruction to vehicle users or the highway.

7.19. Traffic Generation

Appendix AW4: Extract from Greater London Assembly Q&A referring to the criteria for a ‘turn-up-and-go’ bus service

Organisation:	**City Hall Greens**
Asked of:	**The Mayor**
Category:	**Transport**

Question

Bus ridership in London

Have you conducted any research into the length of time bus users are prepared to wait before they seek alternative forms of transport and, if so, can you share it with me?

Answer

Date: Wednesday 28 May 2025

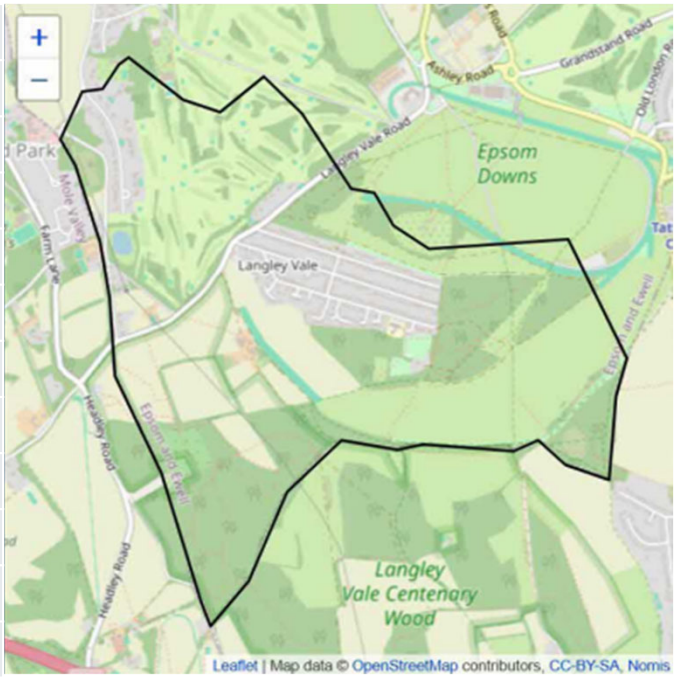
London's extensive bus network means that more than 96 per cent of London households are within 400 metres of a bus stop and over 90 per cent of London households are within 400m of a bus stop served by a high frequency bus service (at least five buses per hour). TfL's research shows that customers "turn up and go" where a bus route operates at five buses per hour or better; where a bus route is less than this TfL publishes timetable information. This research is published on the TfL website via the link here: **https://content.tfl.gov.uk/value-of-time-at-the-stop-summary.pdf**

TfL is taking numerous actions to improve the speed, performance and journey time reliability of bus services. This includes implementing new

Appendix AW5: Travel to Work Census Data for Epsom and Ewell Output Area 0009E

Travel to Work Census Data – Output Area Epsom and Ewell 009E (Source: Nomis - https://www.nomisweb.co.uk/)

Mode of Travel	2011 Census		2021 Census	
Underground, metro, light rail, tram	2	0%	3	1%
Train	101	14%	22	5%
Bus, minibus or coach	9	1%	6	1%
Taxi	2	0%	2	0%
Motorcycle, scooter or moped	8	1%	9	2%
Driving a car or van	530	73%	327	78%
Passenger in a car or van	17	2%	18	4%
Bicycle	16	2%	11	3%
On foot	34	5%	15	4%
Other method of travel to work	8	1%	7	2%
Totals	**727**	**100%**	**420**	**100%**



Appendix AW6: Extracts from Regulation 18 Transport Assessment (October 2024)

Ref: Access to Pharmacies (Ref: Table 16)

19 sites (10%) have a walk time of more than 20-minutes to reach their nearest pharmacy. These sites are located in the wards of College, Nonsuch, Stamford, and Woodcote. In particular, site ⊕ WOO020 Land North of Langley Bottom Farm is the worst performing, with a walk time of more than 30-minutes.

Additional pharmacy provision is recommended for these sites if they are progressed, although it is acknowledged that uptake of free delivery services for pharmaceutical needs is increasing.

Ref: Access to town centre (Ref: Table 20)

More than two thirds of the sites (72%) are situated within a 20-minute walk to their nearest town or secondary centre. Those sites which have more than a 20-minute walk (40-minute round trip) are most in need of a review of their transport links to see if there is potential to shorten the travel time and/or improve the quality of the journey. Where times cannot be shortened, ideally to a less than 10-minute walk, access to tertiary centres should be reviewed both in terms of distance and services they contain to determine whether an additional centre is required at or close to the allocation site.

Cycle times to town and secondary centres are within a 10-minute one-way journey from all allocation sites, apart from ⊕ WOO020 Land North of Langley Bottom Farm. To encourage this potential high cycle usage for access to town and secondary centres, a detailed review of the routes taken is required from any allocation site to make sure they are suitable for cycle use, safe, and that destinations have sufficient secure parking. Any measures identified to encourage cycle use should be addressed as part of the site's mitigation.

Ref: Access to stations (ref: Table 24)

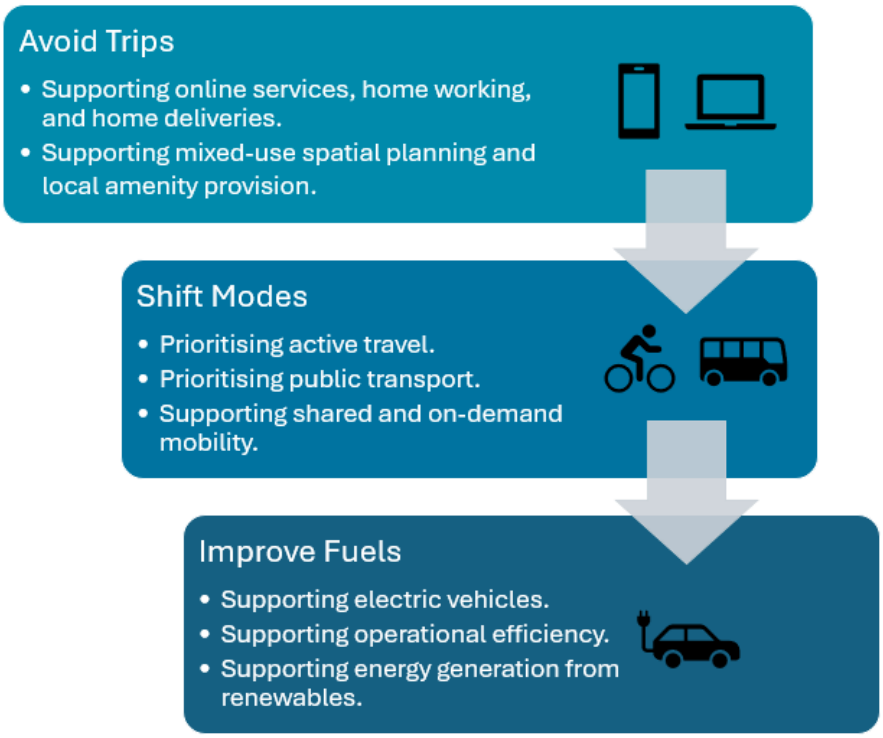
Nearly all potential allocation sites are situated within a 10-minute cycle of a rail station. At a glance this is good in terms of connecting with local towns and London for employment and leisure needs. It also shows the importance of ensuring routes to rail stations are of good standard to encourage cycle use, as well as sufficient provision of secure cycle parking.

The worst performing sites, where travel to their nearest railway station is more than a 30-minute walk, are as follows:

- ⊕ RUX020 Clarendon Park
- ⊕ STA018 Land at West Park Hospital (north parcel)
- ⊕ WOO020 Land North of Langley Bottom Farm

Appendix AW7: Extract from i-Transport's Transport Assessment, referring to the Vision-led approach

Image 3.2: Avoid, Shift, and Improve Principles



3.2 Realising the Vision

3.2.1 To support the realisation of the vision, the development proposal will incorporate a sustainable transport strategy comprising measures delivered as part of the development design.

3.2.2 The Sustainable Transport Strategy is detailed in Section 7 of this TA, providing the design measures and supporting travel planning measures associated with the development proposal which will support the prioritisation of sustainable travel across the site.

3.3 Outcomes of the Vision

3.3.1 The outcome of the vision would be a thriving liveable community in which sustainable travel is prioritised where practicably possible, taking into consideration the location and quantum of the development.

3.4 Vision Statement

3.4.1 Based on the above, there vision for the site is therefore as follows:

"The development proposal will deliver a sustainable and holistically planned development which will prioritise sustainable transport modes where practicable. It will provide a prospering community where residents will feel happy and prosperous, whilst maintaining local character and upholding the rich equestrian history of the local area."

Appendix AW8: 2021 Car Ownership Rates for Epsom and Ewell Output Area 009E

TS045 - Car or van availability

population	All households
units	Households
area type	2021 super output areas - lower layer
area name	E01030418 : Epsom and Ewell 009E

	Households	No. Cars
No cars or vans in household	27	0
1 car or van in household	168	168
2 cars or vans in household	251	502
3 or more cars or vans in household*	134	402
Total: All households	**580**	**1072**

**Calculation assumes no household owns more than 3 cars*

ITP Calcuated figures

Average car ownership per household **1.85**

In order to protect against disclosure of personal information, records have been swapped between different geographic areas and counts perturbed by small amounts. Small counts at the lowest geographies will be most affected.

Appendix AW9: Extract from Residential Car Parking, Residential Car Parking, Part of the London Plan evidence base December 2017 (Transport for London)

1. Links between car parking, ownership and use

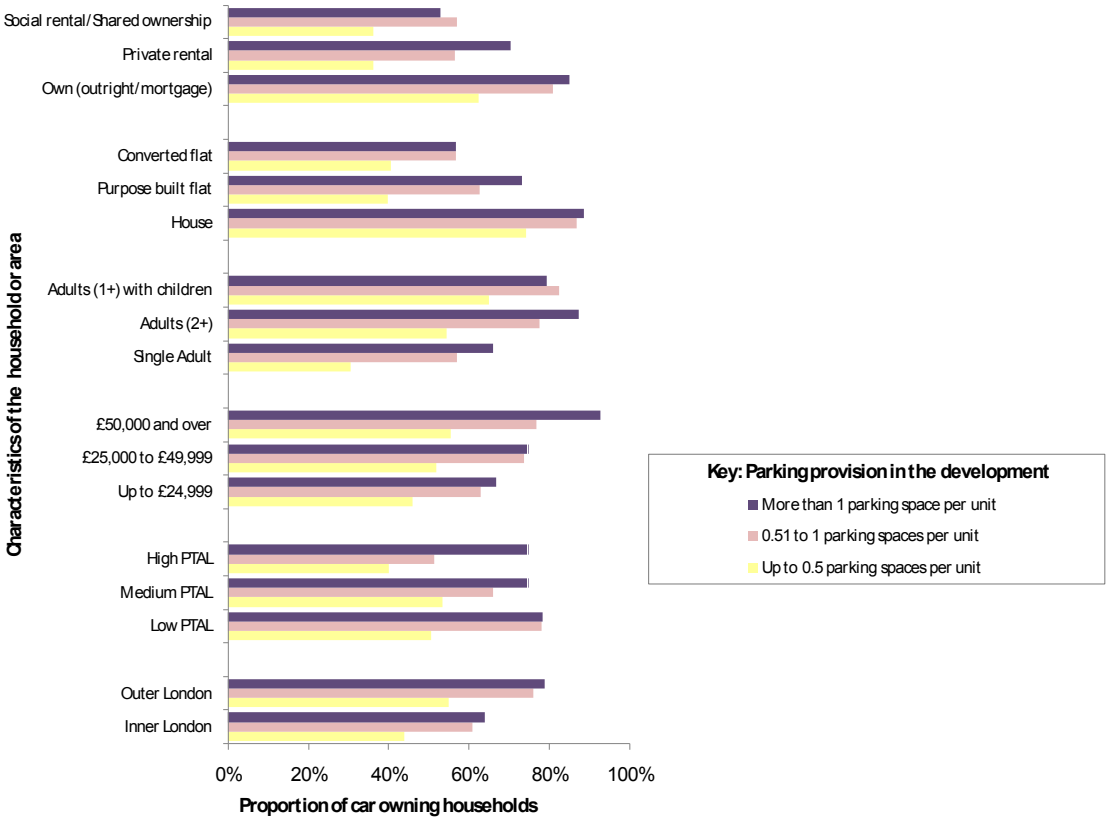
Developments with more car parking have residents who are more likely to own cars; this is consistent across a number of other factors

There is a clear relationship between the availability of car parking at new development and the levels of car ownership of its residents. Research[35] conducted with London residents in 2013 found that for all groups, and in all areas, people living in developments with more parking available had higher levels of car ownership than people living in developments with less parking.

In developments with provision of up to 1 space per unit, car ownership varies with the level of public transport connectivity (PTAL) – as people's alternatives get better, fewer choose to own a car. However, at developments with more than 1 parking space per unit, access to public transport makes relatively little difference to how many households choose to own at least one car.

Income is a key indicator of car ownership, but the effect of parking is in some ways more pronounced: in developments with 0.5 spaces per unit or less, only 56 per cent of people with a high income own a car, while in developments with more parking available, 83 per cent of people with a high income own a car.

Figure 13: Car ownership by parking provision and other key factors, residents of new development, 2012



Source: Residential Parking Provision in New Developments (TfL 2012)

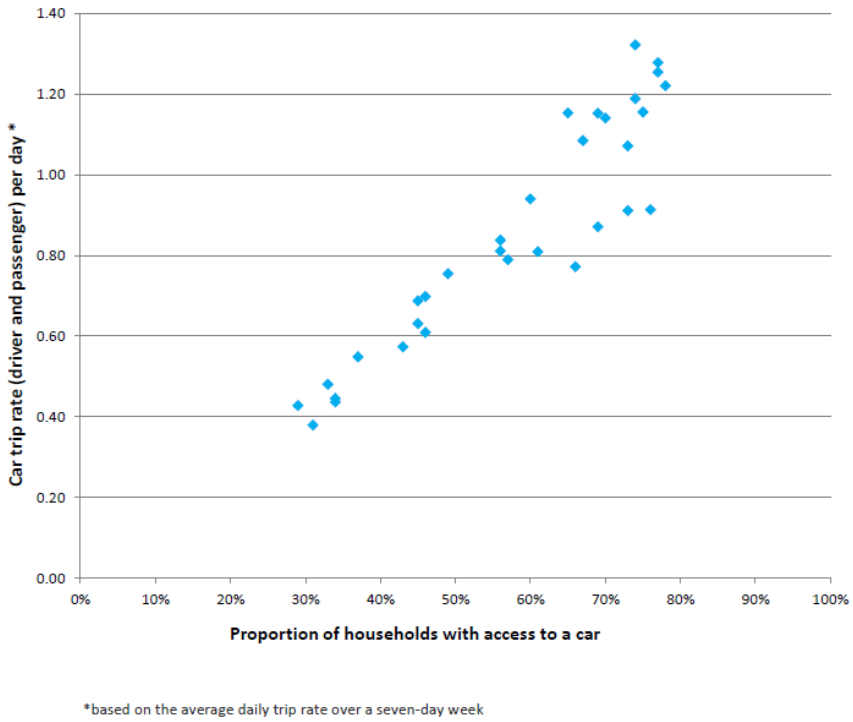
[35] Residential Parking Provision in New Developments (TfL 2012)

The availability of off street parking has a particularly strong effect on the probability of car ownership. Analysis of the London Travel Demand Survey shows that households with off-street parking are significantly more likely to own a car and this is the case even when accounting for differences in household locations and incomes, with different numbers of adults and children in the household, and varying access to public transport. For example, the probability of car ownership for two adults with children living in inner London, on a low income, with reasonable access to public transport goes from 34 per cent without off-street parking, to 57 per cent with it, based on analysis of households with similar characteristics.[36]

Areas with higher levels of car ownership have higher levels of car use

In addition to higher parking provision being associated with higher car ownership, higher levels of car ownership are associated with higher levels of car use: people who own cars tend to use them. Across London's 32 boroughs, there is a clear linear relationship between the rate at which residents make car trips and the proportion of households that have access to a car:

Figure 14: Relationship between household car ownership and average car trip rate by borough, 2013/14



Source: London Travel Demand Survey, 2013/14

Reducing the maximum provision of parking could encourage those who could consider a car-free lifestyle to adopt one

The ability to own and park a car can be a major influence for some Londoners when deciding where to live, while others may prefer to prioritise other factors such as local public transport connectivity or proximity of amenities. To some extent at least, the availability of

[36] TfL City Planning analysis of the London Travel Demand Survey

parking attracts existing car owners, which in turn increases the car use generated by the development.

However, there are also Londoners who will find the decision to own a car more marginal, such as those who use their car infrequently or those who do not own one but would consider buying one. When surveyed in 2011,[37] only a quarter of residents of new development in inner London said their lifestyle depended on owning a car, while a fifth of those who said they were not dependent on a car still owned one. Car parking did not influence the decision of where to live for over half of inner London residents, and while parking does have more of an influence among outer London residents, a majority said access to public transport, work and local services was a major influence.

Combined with measures to make alternatives to private car ownership more attractive, lower levels of parking provision in new development can encourage more Londoners to adopt car-free lifestyles, particularly among those who do not need a car but may or may not decide to own one in future.

While the above analysis and the proposed standards refer to new development, it is worth noting that much of the existing housing stock across London have access to car parking[38] and will still be able to cater for those people who require a vehicle for work or prioritise owning one for other reasons (other than disability, which is covered in the next section) This represents around 3.5 million homes and will continue to represent the majority of available housing over the course of the Plan.

[37] Residential Parking Provision in New Developments (TfL 2012)
[38] London Travel Demand Survey 2015/16

Appendix AW10: Extract from i-Transport's Transport Assessment, confirming intentions for car parking

6.4 Stage 1 Road Safety Audit

6.4.1 A Stage 1 Road Safety Audit (RSA) has been commissioned by an independent auditor to assess the site access proposals. The RSA did not raise any material issued with the proposed site access, with the minor comments raised to be dealt with during reserved matters.

6.4.2 The Stage 1 RSA and Designer's Response is contained within **Appendix D**.

6.5 Parking Provision

6.5.1 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) (December 2015). The relevant parking standards are provided in **Table 6.1**.

Table 6.1: EEBC Residential Car Parking Standards

No. of Bedrooms	Minimum Parking Standards
1- & 2-bedroom flats	1 space per unit
3+ bedroom flats	1.5 spaces per unit
1- & 2-bedroom houses	1 space per unit
3-bedroom houses	2 spaces per unit
4+bedroom houses	3 spaces per unit

Electric Vehicle Parking

6.5.2 Electric vehicle (EV) charging points will be provided in accordance with SCC's guidance, which itself, is based on *'The Building Regulation 2010 – Infrastructure for the charging of electric vehicles – Approved Document S – 2021 Edition'*. The guidance states that for residential development, *'one faster charger'* must be installed *'per unit'*.

6.5.3 Each dwelling will therefore be equipped with active EV charging provision, which will assist in the transition to cleaner fuels.

Cycle Parking

6.5.4 EEBC's Parking SPD states that cycle parking should be provided in accordance with SCC's 'Vehicular, electric vehicle and cycle parking guidance for new developments' online guidance. standards, cycle parking will be:

> *"provided for all dwellings and the location of the cycle parking should be convenient, accessible and fit for purpose for the lifetime of its use, and where possible, should be provided within the fabric of the building. Where cycle parking is provided within garages, such structures should be increased in size for both storage and the access/egress of vehicles."*

Appendix AW11: Site Photographs

Surface water build-up at proposed site access

Vehicle interaction with horse traffic