

REPORT

Summary 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-0002
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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, and have experience of preparing and presenting transport planning evidence at planning appeals and public inquiries.
- 1.1.4 I am instructed by Langley Vale Action Group (LVAG) to give evidence on transport.
- 1.1.5 The appeal is by Fairfax Aspire Ltd (PINS 6006971) against the Council's refusal of outline permission for up to 110 dwellings, all matters reserved except access from Langley Vale Road, at Farm View, Langley Vale Road, Epsom (25/00846/OUT).
- 1.1.6 My evidence addresses Reason for Refusal 1, that the site is 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.
- 1.1.7 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 Reason for Refusal 1 states that 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..."***
- 2.1.2 The 2024 NPPF requires significant development to be located where the need to travel is reduced and a genuine choice of transport modes is available. It also requires sustainable transport modes to be prioritised, having regard to the site's location and characteristics.
- 2.1.3 For Green Belt development, NPPF paragraph 155(c) requires the site to be in a sustainable location. In my opinion, the appeal site does not satisfy this requirement and is not a sustainable location for major residential development.
- 2.1.4 Epsom and Ewell Core Strategy (2007) Policy CS16 seeks to minimise the need to travel, encourage access by non-car modes and ensure major developments are well located for walking, cycling and public transport. Policy DM10 of the Epsom and Ewell Development Management Policies Document (2015) requires appropriate connections to surrounding highway and pedestrian networks.
- 2.1.5 My evidence is that the site's distance from everyday services, limited public transport provision and reliance on unmade public rights of way do not provide the "safe, convenient and attractive accesses" sought by Policy CS16 and are unlikely to encourage walking or other non-car trips.
- 2.1.6 Accordingly, I consider the proposal to conflict with the NPPF, Policy CS16 and Policy DM10 for the reasons set out in the Council's refusal.

3 Pedestrian and Cycle Access to Everyday Services

3.1 Distances to Local Amenities

- 3.1.1 Langley Vale contains a pre-school, primary school, village hall and small convenience shop, but lacks health facilities, a secondary school, a supermarket and significant employment opportunities. Residents therefore need to travel elsewhere for many everyday needs.
- 3.1.2 Distances agreed in the Transport Statement of Common Ground show that healthcare, pharmacy and larger retail facilities are approximately 2.9km to 3.3km from the site, while Tattenham Corner station is around 2.9km away.
- 3.1.3 Of the 31 destinations listed, 22 are more than 2km away and 26 are more than 1km away. Only three are within 800m of the site's centre.
- 3.1.4 Guidance on walkable neighbourhoods typically identifies an 800m walking distance as providing convenient access to everyday facilities.
- 3.1.5 Active Travel England advises that a range of local amenities should be available within 800m of homes and bus stops with regular services within 400m.
- 3.1.6 In this case, only the Texaco garage is within 800m of the site and the nearest bus stops are beyond the 400m guideline. Most facilities are substantially further away.
- 3.1.7 The August 2026 National Planning Policy Framework also recognises 800m as a reasonable walking distance, while acknowledging that topography, route quality and physical barriers can further reduce walkability.
- 3.1.8 Taken together, the evidence indicates that the site does not provide convenient walking access to the range of services and facilities typically associated with a walkable and sustainable residential location.

3.2 Local Topography

- 3.2.1 The proposed access is located at a low point on Langley Vale Road, with rising ground to the north, south and east. Topography is therefore a notable characteristic of the area.

- 3.2.2 As a result, journeys between the site and most local destinations would involve significant gradients, particularly for pedestrians and cyclists.
- 3.2.3 In my opinion, these gradients are likely to discourage walking and cycling and increase reliance on the private car.
- 3.2.4 This is reflected in the consented convenience store development at the Texaco petrol filling station (Ref. 25/00052/FUL), which includes no cycle parking on the basis that cycling was not considered a realistic mode of access.

3.3 Route Quality

- 3.3.1 The 2026 NPPF and Active Travel England guidance recognise that route quality, physical barriers and walking conditions influence travel choices. ATE seeks routes with adequate width, even surfaces and lighting.
- 3.3.2 The TSoCG confirms that, near the site, Langley Vale Road is served by a relatively narrow footway, typically 1.0m to 1.5m wide.
- 3.3.3 South of the proposed access, the pedestrian route linking to the Pegasus crossing is unmade, uneven and unlit.
- 3.3.4 While the local Public Rights of Way network provides useful connections, many routes are unlit and have uneven surfaces. The TSoCG acknowledges that these routes are not ideal in poor weather or during winter months, reducing their suitability for regular everyday trips.

3.4 Summary

- 3.4.1 In my opinion, the site's location, topography and route quality do not provide realistic opportunities for regular walking and cycling, resulting in continued reliance on the private car.

4 Public Transport Services

4.1 Bus Services

- 4.1.1 The nearest bus stops are on Grosvenor Road (c.410m from the centre of the developable area) and Rosebery Road (c.610m), both served by routes E5, 408 and 618.
- 4.1.2 Measured from the centre of the site, both stops lie beyond Active Travel England's recommended 400m walking distance. Walking distances for many future residents would be greater still.
- 4.1.3 Existing bus provision is limited. The E5 operates approximately every two hours on weekdays and Saturdays, with no Sunday service. Route 408 operates once daily and route 618 only during school terms.
- 4.1.4 Transport for London refer to a high-frequency "turn-up-and-go" bus service as one operating at around 12-minute intervals. The E5 falls significantly short of this benchmark.
- 4.1.5 Service frequency and reliability are particularly important given Epsom town centre and railway station are likely to be key destinations. The infrequent nature of the E5 means that a missed service can result in impractical delays.
- 4.1.6 The appellant proposes measures to improve bus accessibility, including a contribution of £200,000 per year for five years to support Surrey Connect or increased E5 frequencies. While these measures would be secured, the funding is temporary and does not guarantee a long-term service.
- 4.1.7 The suggestion that enhanced services could become commercially viable is speculative. Given the site's car-dependent nature and parking provision, it is unlikely that patronage would sustain an improved service beyond the funding period. A pre-booked demand-responsive service would not provide a genuine "turn-up-and-go" alternative.
- 4.1.8 Census data for the local area indicates that only around 1% of journeys to work are made by bus. The 2021 Census shows a similarly low figure. Even substantial growth from this baseline would result in only a modest mode share.

- 4.1.9 The available evidence indicates that bus services do not provide a realistic alternative to private car use. Bus stops are beyond recommended walking distances, services are infrequent and limited, and the proposed improvements depend on time-limited funding.
- 4.1.10 Consequently, future residents are likely to remain heavily reliant on the private car, and bus accessibility should carry limited weight in support of the sustainability credentials of the proposed development. While the proposed financial contribution is welcome, it is a temporary mitigation measure that cannot overcome the site's long-term accessibility constraints.

4.2 Rail Services

- 4.2.1 Tattenham Corner is the nearest railway station, located approximately 2.9km from the site and not served by a direct bus connection from Langley Vale.
- 4.2.2 Walking to the station would take more than 30 minutes and requires either routes through woodland and the racecourse or travel via the highway network. Given the distance, route characteristics and topography, I do not consider walking to be a realistic option for many residents, particularly regular rail commuters.
- 4.2.3 This is consistent with the appellant's Transport Assessment, which states that the local railway station can be accessed by a short car journey, implicitly recognising reliance on the private car for rail access.
- 4.2.4 Once residents have commenced a journey by car, there is an increased likelihood that they will continue directly to their destination rather than transfer to rail, limiting the potential for rail travel to reduce car dependence.
- 4.2.5 The Council's Regulation 18 Transport Assessment identified Land North of Langley Bottom as one of the poorest-performing sites in the Borough for access to railway stations, with walking times exceeding 30 minutes, cycle times of 10 to 15 minutes and public transport journey times of 20 to 25 minutes.
- 4.2.6 The same assessment found that the site performed particularly poorly in relation to access to local facilities and was the only allocation site outside a 10-minute cycle journey of town and secondary centres.

- 4.2.7 While cycling could provide access to local stations, its attractiveness is constrained by the area's topography and road conditions. Cyclists must share relatively narrow carriageways with motor vehicles, and the gradients along Langley Vale Road can make journeys more difficult and less appealing. This is reflected in Census data, which indicates a cycling mode share of only around 2% in the local area.
- 4.2.8 Accordingly, walking and cycling are unlikely to provide realistic means of accessing rail services for a significant proportion of residents.

5 Department for Transport Connectivity Tool

- 5.1.1 Surrey County Council's consultation response to application 25/0846/OUT objected to the development on sustainability grounds. Referring to the DfT Connectivity Tool, the County Council noted that the site scores 42, placing it within the bottom 15% of locations in England and Wales for accessibility. The Council concluded that the developer had not demonstrated how the proposed transport measures would deliver the substantial improvement required to reduce reliance on the private car and considered a score of around 70 or above necessary to support significant residential development.
- 5.1.2 A location within the bottom 15% nationally can reasonably be regarded as having very poor accessibility. In my opinion, the proposed contribution of £200,000 per year for five years towards bus services does not represent the "step change" in accessibility that the Highway Authority considers necessary to make the development sustainable.

6 Langley Bottom Farm Appeal Decisions

- 6.1.1 The appellant relies on the 2022 and 2025 Langley Bottom Farm appeal decisions as evidence of the site's sustainability. Neither supports a development of this scale.
- 6.1.2 The 2022 appeal related to 20 dwellings on adjoining land. Although permission was granted, the Inspector found the site was not "an exceptionally accessible location" and that residents would be likely to rely on private cars for a high proportion of journeys due to limited public transport provision.
- 6.1.3 The Inspector's conclusion was reached in the context of a much smaller scheme that was considered not to constitute significant development. The current proposal would generate substantially greater travel demand and cannot rely on the same reasoning.
- 6.1.4 In my opinion, the 2022 decision supports the conclusion that the appeal site is not highly accessible and that future residents would remain heavily dependent on private car travel.
- 6.1.5 The 2025 appeal concerned a single replacement dwelling at Langley Bottom Farm and was dismissed. It provides no meaningful support for the appellant's case on transport or accessibility.

7 Vision-led Approach and Trip Generation

- 7.1.1 The appellant describes the Transport Assessment as vision-led, but its stated aim is only to prioritise sustainable travel "**where practicably possible**", reflecting the site's existing constraints rather than overcoming them.
- 7.1.2 The appellant's Transport Assessment applies a 10 per cent reduction in vehicle trips to reflect an assumed shift to sustainable modes. In my opinion, this modal shift has no secure basis.
- 7.1.3 On the appellant's own figures the car dominates, accounting for around 69% of morning peak trips and 81% of evening peak trips. Census data and local travel patterns point to similarly high levels of car dependence.
- 7.1.4 Local car ownership levels (1.85 cars per household) and the proposed parking provision are likely to reinforce car use, with all dwellings benefiting from on-plot parking in line with the Council's standards.
- 7.1.5 In my opinion, the combination of extensive parking provision, high car ownership and limited public transport accessibility means that private cars will remain the principal mode of travel for future residents.

8 Other Matters

8.1 Introduction

- 8.1.1 While I recognise the agreed position between Surrey County Council and the appellant on highway safety, I draw attention to two observations from my site visits and comment on the package of sustainable transport measures proposed.

8.2 Interaction with Horses

- 8.2.1 Langley Vale Road forms part of an established racehorse movement route and is used daily by horses. The development would introduce additional traffic and a new access onto this route.
- 8.2.2 The recent Statement of Common Ground between Epsom and Ewell Council and the Jockey Club, in connection with the new Epsom Local Plan, refers to a Racehorse Movement Corridor designation, which includes Langley Vale Road.
- 8.2.3 I draw the interaction of vehicles and horses to the Inspector's attention as a matter that may be afforded weight.

8.3 Highway Drainage

- 8.3.1 Langley Vale Road is prone to surface water ponding near the proposed access. Given the local topography, there is potential for runoff from the access road to drain towards this low point and worsen existing conditions.
- 8.3.2 While drainage issues may be resolved through detailed design, standing water on a route used by motorists, cyclists and horses is relevant to the attractiveness and comfort of active travel and may be a matter for the Inspector to consider.

8.4 Package of Measures

- 8.4.1 I agree that the planning conditions identified in the TSoCG are typical and necessary.
- 8.4.2 The proposed £200,000 annual contribution towards bus services has been addressed elsewhere in my evidence.

- 8.4.3 The package also includes two car club spaces, with EV charging, free membership and a £50 driving credit for residents for a minimum period of three years.
- 8.4.4 Car clubs are generally most effective in locations with strong public transport, limited parking and lower levels of car ownership. In contrast, this development would provide parking to meet expected demand in a location where car use is likely to remain dominant.
- 8.4.5 The car club would be more likely to supplement rather than replace private car ownership and the appellant has not demonstrated that sufficient demand exists for the measure to be effective
- 8.4.6 For these reasons, I attach limited weight to the car club as a sustainability measure.

9 Conclusions

- 9.1.1 The principal issue is whether the site provides future residents with a genuine choice of transport modes for everyday journeys. Having reviewed the evidence, I conclude that it is not a sustainable location for major residential development.
- 9.1.2 Most everyday services and facilities are located well beyond recognised walking distances. Healthcare, pharmacies, larger retail facilities, employment opportunities and rail services are generally around 2.9km to 3.3km from the site. Apart from the Texaco shop, no listed facility is within an 800m walk.
- 9.1.3 Accessibility is further constrained by challenging topography and by reliance on unlit, largely recreational public rights of way, which are less attractive and practical for everyday travel, particularly in poor weather and during winter months.
- 9.1.4 Public transport provision is also limited. Bus stops lie beyond Active Travel England's recommended walking distance and services are infrequent. While the appellant proposes mitigation measures and bus funding, these are temporary and do not overcome the site's inherent accessibility constraints. Existing bus use in the area is already very low.
- 9.1.5 The nearest railway station is approximately 2.9km away and is unlikely to be accessed on foot by many residents. The appellant's own evidence recognises that access to rail services is likely to be by car. Cycling is similarly constrained by gradients, highway conditions and limited infrastructure.
- 9.1.6 These concerns are reinforced by Surrey County Council's connectivity assessment, which identified the site as performing poorly compared with locations across England and Wales, and by previous appeal decisions recognising the area's dependence on private vehicles. Acceptable highway impacts do not alter the question of whether the site is sustainably located.
- 9.1.7 Taking these matters together, I conclude that future residents would be heavily reliant on the private car. The development would not provide a genuine choice of transport modes and cannot reasonably be regarded as being in a sustainable location.



- 9.1.8 Accordingly, the proposal conflicts with NPPF paragraphs 110, 115 and 155(c), together with local transport policies, and supports the Council's position under Reason for Refusal 1. I respectfully invite the Inspector to dismiss the appeal.