Farm View Inquiry

LVAG Opening Statement

Langley Vale Road • Appeal 6006971

Suzanne Morris

Member of Langley Vale Action Group

Good morning, Inspector.

My name is Suzanne Morris. I am a resident of Langley Vale, a committee member of Woodcote (Epsom) Residents' Society and a member of the Langley Vale Action Group formed to represent local concerns about this development proposal. I will undertake advocacy on LVAG's behalf, including delivering our opening and closing submissions. Jane Clarke, a resident of Langley Vale and secretary of LVAG, will share the advocacy responsibilities and cover the sessions I am unable to attend. Carl Thomas, who cannot attend following the changes to the Inquiry dates, will continue supporting our team throughout the proceedings.

I will also speak separately as a local resident.

LVAG welcomes the opportunity to participate as a Rule 6 party. LVAG represents many hundreds of local residents and important horse-racing and training interests. We will seek to assist the Inquiry through focused evidence and questioning, avoiding unnecessary duplication of the Council's case.

LVAG's case

LVAG asks that this appeal be dismissed.

Our case concerns the suitability of this proposal in this particular location, taking account of its sustainability, accessibility, environmental effects and relationship with the horse-racing and training industry.

LVAG recognises the need for housing but considers that it must be appropriately located and sustainable and not threaten the operational continuity of the nationally significant horse racing and training industry centred on Epsom Downs.

The Council's evidence supporting the emerging Local Plan identifies substantial concerns about development in this location. Its Green Belt Topic Paper Addendum assesses Land North of Langley Bottom Farm as the lowest-scoring site in the Regulation 18 transport assessment, ranking it 256 out of 256 sites. It also identifies a risk of unrestricted sprawl beyond the weak southern boundary and concludes that exceptional circumstances have not been demonstrated to justify releasing the site from the Green Belt.

These findings provide important context for this appeal. Andy Ward and John Mumford will explain their relevance to the proposal, alongside the appellant's evidence and the applicable policy framework.

Separately, emerging Policy DM8 directly addresses the effects of development traffic and design on the safety of racehorses travelling between the stable yards and training grounds within the defined Racehorse Movement Corridor. Policy DM8 recognises the national importance of Epsom's racehorse training grounds and their contribution to the area's economy

and sporting heritage. John Mumford's evidence will address the relevance of that policy to this appeal and the weight it should receive.

We ask that the proposal is assessed against a realistic understanding of how Langley Vale operates, including the circumstances experienced by those who live and work here.

Sustainability and accessibility

A central question is whether the site would provide a sustainable location for new housing. That requires a practical assessment of how future residents would reach employment, schools, shops and other services, and whether walking, cycling and public transport would provide realistic alternatives to the private car. The transport choices available to future residents influence the traffic generated by the development. That traffic must then be considered in the context of the local road network and the activities it serves.

Andy Ward's evidence will address those matters. He will consider the accessibility of the site and the extent to which the available routes and services could meet everyday travel needs. The presence of a route or bus stop is only part of that assessment. Its usefulness also depends on safety, convenience, service frequency and whether it connects people with the destinations they need to reach.

LVAG will examine whether the appellant's assessment adequately reflects those practical considerations and whether the proposed measures would materially reduce reliance on car travel.

We recognise that transport opportunities must be considered in their local context. Our case is that the opportunities available here, and the effectiveness of the measures proposed, require careful scrutiny before conclusions are reached about the sustainability of the development. LVAG's evidence will explain why, in our assessment, the proposal would leave future residents heavily dependent on private vehicles and why the measures proposed would not adequately address that dependence.

Movement and the horse racing and training industry

We welcome the Inspector's request that the parties address whether the proposal would generate a significant amount of movement in the context of the area, for the purposes of Policy TR3(1)(a).

LVAG will address that question through oral evidence and cross-examination, as directed.

Our position is that the significance of additional movement requires a contextual assessment. Alongside the number of journeys, the Inquiry should consider their timing, character and location, the people and animals using the route, and the opportunities for conflict.

Langley Vale Road forms part of the working environment of the horse-racing and training industry. The interaction between horses, riders and vehicles is therefore central to understanding the proposal's implications.

Pat Phelan will explain the practical operation of that industry and the circumstances in which horses and riders use the local road network. Andy Ward will address the transport implications.

Together, their evidence will assist the Inspector in testing whether the appellant's assessments adequately reflect local conditions and whether the proposed arrangements provide an effective response.

LVAG will also explore how the conclusions on accessibility and car dependence relate to the additional movement that would be generated. These issues should inform a joined-up assessment of the development. It is our view that the increase in traffic volume and its timing would increase the risk of conflict with racehorses and their riders that use the corridor along Langley Vale Road between stables and the exercise gallops on Epsom Downs.

Construction stage effects

We also welcome the Inspector's request that the parties address potential construction-stage effects on horse racing and training.

The construction period requires consideration in its own right. Temporary effects can still be significant for an established activity, particularly where its day-to-day operation depends on the use of shared routes.

The matters to be explored include the type and timing of construction traffic, its interaction with horse movements and the practical operation of any proposed controls.

Pat Phelan's evidence will address the sensitivity of racehorses to construction traffic and disturbance, and the implications for the safe use of established routes between the stable yards and training grounds. LVAG will examine whether the proposed controls would adequately protect those movements throughout construction.

Where details would be left to a construction management plan, we will examine whether the evidence before the Inquiry provides sufficient confidence that an acceptable solution is achievable.

Landscape Green Belt and ecology

LVAG's case also raises concerns about landscape effects, Green Belt considerations, ecology and biodiversity.

Our questioning will focus on the evidence supporting the appellant's conclusions, the assumptions underlying those conclusions and the effectiveness of the mitigation proposed.

Robert Shatwell is unable to attend. LVAG will rely on his submitted written evidence, recognising that the Inspector will determine the weight it should receive.

Our questioning of the appellant's ecological witness will seek to clarify the outstanding matters and the basis for the conclusions presented.

John Mumford's planning evidence will address the relevant policy framework, including Green Belt matters and the overall planning balance. In accordance with the Inspector's request, he will also address the relevance and application of Policy DM8 of the emerging Local Plan, including the weight it should receive at its current stage.

The planning balance

LVAG recognises that the proposal would deliver benefits, including housing and affordable housing. Those benefits must be assessed fairly and given appropriate weight.

The Inquiry must also establish the nature and extent of the harms, the degree to which they could be addressed and any limitations or uncertainties in the measures proposed.

Our evidence will explain why, in LVAG's assessment, the benefits do not outweigh the objections to development in this location.

In reaching that assessment, sustainability should be considered across the proposal as a whole: the accessibility of everyday destinations, likely travel patterns, effects on existing activities, environmental consequences and the effectiveness of the proposed mitigation.

The questions for the Inquiry

Through its evidence and questioning, LVAG will seek clear answers to three connected questions.

First, has the proposal been assessed against an accurate understanding of local conditions, including the transport choices available and the operation of the racing and training industry?

Second, would the proposed measures adequately address the effects of construction and occupation, and can those measures be secured and delivered?

Third, having considered the relevant policies, benefits and harms together, is this an acceptable and sustainable location for the development proposed?

We will draw our conclusions together in closing submissions, taking account of the evidence heard and the matters established through cross-examination. LVAG will seek to assist the Inspector with a focused examination of those questions. For the reasons our evidence will develop, we ask that the appeal be dismissed.

Thank you, Inspector.