

Epsom Civic Society

formerly Epsom Protection Society

shaping the future, safeguarding the past

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The Planning Inspectorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

27th April 2022

Dear Mr Devereux

Ref: **Appeal Reference APP/P3610/W/21/3280881 Langley Bottom Farm, Epsom**

The Epsom Civic Society originally objected to the Planning Application 20/00475/FUL on the 15th April 2020. These objections were similar to the Epsom and Ewell Council refusal reasons and observations.

2 years have passed since the ECS original objections and therefore the situation on the proposed site has developed. Whilst the proposed application remains the same, the site criteria has altered. This relates to the following aspects :

- 1) Langley Bottom Farm has continued to function as a normal farm. 2 flocks of sheep occupy the adjacent fields, arable crops remain intensive in the large field to the north, the grain silos store the wheat and the barns protect the hay bales and farm machinery. The farm has never stopped being a fully operational farm since the Woodland Trust purchased many of the surrounding fields in 2014. The Appellant (Fairfax Properties) must either be blind or trying to pull the 'wool' over our eyes. The site is still being mainly used for agricultural employment.
- 2) Some of the buildings have remained in non agricultural use ie funeral masons, VW van repairs, shooting lodge and breakdown truck parking. Many of these functions were operational well before 2014 and have co-existed with the farm operations.



- 3) The Langley Woods have significantly developed and have gained national interest. The wildlife habitats and biodiversity has developed with the planting and growth of the new trees. The operational farm works in tandem with the LV woods, providing nesting for Bats, owls, badger setts and the flora and fauna. The new housing estate would jeopardise this arrangement. Light pollution from the houses and road would be a major problem plus the effect of road traffic and environmental infringements.
- 4) Since the Covid Lockdown, this area of our Green Belt has seen a substantial increase in leisure use. This has included many more ramblers, horse hacks, cyclists and visitors to The LV Woods and Epsom Downs.

The Application boundary, shown as a red line, is much greater than the existing farm buildings. Therefore, most of the land area falls outside of the definition of Previously Developed Land and the small number of buildings not in agricultural use should not sway this argument.

The ECS are very concerned that The Woodland Trust stated at the time of purchasing the farmland in 2014 that they did not propose to use any of the land for agriculture. The Appellant has translated the sale of the farmland to the fact that the farm no longer functions as a working farm. This is obviously not the case. The farm continues to be operated by Jelley Farming Ltd which is listed as ‘crop and animal production’.

The farm continues to support local needs. The hay is produced on the fields, stored in the barn and then sold to the local race horse training stables. Excellent sustainability with minimal delivery distances. The Woodland Trust have remained committed to providing Grazing Rights on their fields adjacent to the farm. These rare breed sheep rearing facilities would be put at risk by the proposed housing estate and in turn jeopardise the link to the supporting nature and environment.

The ECS are extremely concerned of the Appellant’s statement that there would be minimal harm caused to the Green Belt and that any harm would be outweighed by the benefits. This is absurd! The Green Belt, at the southern boundary of our borough safeguards our countryside from encroachment. There would be a major effect on the local biodiversity and the visual sensitivity of the surrounding areas including the historic racecourse and Langley Vale Village. The Atkins Green Belt Study commissioned by the Council in May 2018 concluded that the release of this land from the Green Belt would compromise the overall integrity of the landscape. This Atkins

study stated 'that it scored high and is performing well and falls within an area of Great Landscaped Value'.

The ECS strongly refutes that there are any 'very special circumstances' for building houses on this very beautiful Green Belt land and requests that the appeal be dismissed.

Yours sincerely,

Bob Hollis (Vice Chair of The Epsom Civic Society)

