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26 February 2018

The Chief Planning Officer  
Mole Valley District Council  
Pippbrook  
Dorking  
Surrey  
RH14 1SJ

Dear Sir,

**Application No: MO/2018/0004**

**Location: Land at Langley Vale, South of Downs Road and east of Headley Road, Headley, Epsom**

We refer to the above planning application this letter should be read in conjunction with our earlier letter of **23 February 2018** making our recommendation for a revised traffic route covering construction and visitor vehicles. We believe that there is a need to find an alternative means of keeping traffic away from the narrow highways of Farm Lane and Park Lane, Ashtead.

Our attention is drawn towards the **Transport Assessment Report** dated November 2017 and listed below are the paragraphs to which we need to make reference:-

- 1.8** We admit to being unfamiliar with the comparison site of Heartwood Forest although having reviewed the road network, there are several variations. Para 6.7 identifies the differences with no local facilities in easy reach of Langley Vale, whereas Heartwood is within close proximity of a village.
  
- 2.2** Based upon peak weekends in the summer, we are looking at a comparison of 170 parking spaces in total at Langley Vale compared with our estimate of 150+ spaces at the National Trust site on Headley Heath less than 3 miles away. Knowing that drivers do not like paying for parking, we are anxious about road side parking along the private road of Shepherds Walk almost

opposite the proposed entrance, together with our concerns for other unrestricted parking in close proximity.

- 4.7/** We should not like to see too much reliance placed upon public transport for  
**4.18** weekend visitors. From local knowledge the services could at best be described as spasmodic.

### **Site Access**

**5.13/14** The proposed entrance to the car park off Headley Road is a particularly narrow stretch of road that is barely passable by vehicles travelling in opposite directions. The proposal to widen a section by one metre will have very little impact to improve the situation and will be inadequate to accommodate coaches. Further, we are under the impression from local archaeologists that widening the road will remove the remains of earth banks constructed in Roman/Saxon times. Also it is known that the accompanying hedges have been standing for some 500 years.

- 5.21** It is envisaged that school trips and organised days out to the woodland would necessitate the provision for coaches. Whilst the proposal includes spaces for coaches, if approved we recommend a maximum number of coaches per day to reflect the possible impact upon normal traffic flow.

### **Traffic Impact**

**7.2** Traffic data that was collected on Saturday/ Sunday 5/6 March 2016 at the junction of Downs Road/Headley Road/ Shepherds Walk/Farm Lane is not representative of a busy weekend in the summer. The lane network feeds traffic to and from Headley Heath, Box Hill and Epsom Downs, all of which are popular beauty spots for family days out. Therefore, to be a realistic survey monitoring peak volumes for the summer months of the year, an up to date survey needs to be undertaken at a weekend in either June or July.

- 7.5** There is a presumption that the majority of trips will arrive/leave passing through Downs Road/ Farm Lane junction and according to the off-site route onwards to Park Lane and the A24. The roads of over a mile in length are narrow, mostly without pavements in spite of residential housing from which vehicles reverse out and into the traffic flow. Additional traffic, including coaches, will surely result in the possibility of a serious accident. There is no reference in any document about the protection of pedestrians and cyclists who are in abundance and continue to cycle the thrills of the Olympic route.

### **Construction Traffic**

**7.29** Whilst we have concerns for future visitor traffic, the prospects of 111 HGV trips each way seem to be dismissed without any concern for the narrow lanes that are in a very poor state of repair.

- 7.31** We note that highway works would be completed between 09:30 and 16:00 but there is no reference to the times of movement for the HGVs. The

applicant fails to make reference to the traffic congestion associated with the City of London Freeman's School (CoLFS) in Park Lane. Also, CoLFS has applied for a traffic route change that, if agreed, will mean parent's cars exiting into Park Lane. In addition, students will be exiting through pedestrian gates to cross to the footway on the western side. A school-crossing attendant operates during peak times but after school activities will mean that children will be crossing after the attendant's shift has ended.

Also, the outward route for construction and visitor traffic is proposed to reach the busy and complicated 5-way road junction at Park Lane/Dene Road/St. Giles'/Rookery Hill. Visibility there is often poor with drivers having to look in several directions at once to achieve a safe passage. In addition, the times of the construction traffic flow take in a busy pick-up period for St Giles' Primary School when there will be young children crossing the road to reach parked cars in the St Giles' Church driveway. There will also be the temptation of avoiding the narrow Park Lane to the A24 and turning left towards the 90-degree sharp bend into Rectory Lane. Drivers follow SatNavs not route plans

School drop off and pickup times are a major source of concern to residents in the vicinity of both schools. Had a proper survey been undertaken this matter would have been taken into consideration. Yet another shortfall in the study of the Traffic Consultants.

### **Conclusion**

- 8.14** It states that the model results for AM and PM weekday peaks at the Downs Road/ Headley Road give way junction show this junction to be over capacity. The route is a very busy "Rat Run" and we consider the construction work with associated vehicles and, later, future visitors will impact upon traffic flow all day.
- 8.15** Within the whole of the Transport Assessment, we cannot find any one statement that is further from the truth than the following "The site meets the local and national transport policy guidance and has no perceptible detrimental effect on the local highway network and therefore provides a suitable opportunity on transport grounds for the provision of a new car park and visitor centre to support the woodland development". Sadly, no thought and time has been given to previous recommendations put forward by local organisations including ourselves who are in a position to speak with experience of the environment in which we live. There will be a perceptible impact upon all residents living in Farm Lane, Park Lane and other roads in close proximity.

Now we should like to look at **The Green Belt Justification Report**.

- 2.8** The site is located within the Metropolitan Green Belt and designated as a local area of great landscape value, which acts as a buffer to the Surrey Hills, an Area of Outstanding Natural Beauty. Given the description we would challenge the location of the car park and visitor centre that could be construed as being detrimental to the locality.
- 4.3** In spite of the supporting statements we do not see the application as sustainable development and recommend it should be refused on such grounds.
- 4.101** We must contradict the statement that “110,000 visitors can be accommodated without a negative impact upon the highway network”. Sadly, an analysis of this form shows total disregard for the immediate locality and those that live along the proposed access routes.
- 4.112** It is said that the location of the car park, visitor centre and play area has been selected among other reasons for its limited visual impact and connection with the public highway. Whilst consideration has been given towards residential amenities of neighbouring properties, one major aspect has been overlooked. Shepherds Walk is the home of several equine centres involved in the horse racing industry for which Epsom is proud of its heritage, in spite of the pressure it faces from other centres around the country. We are surprised that nowhere is there reference to the paddock opposite the entrance to the proposed car park that currently is given over to all-weather training facilities. The additional noise and general disturbance will impact upon these valuable highly-strung thoroughbred animals. We are aware that the trainers and owners have expressed their concern for which we offer our full support. This is a serious oversight on the part of the applicant.

We have taken opinions from various local experts in relation to the overall site. We have been advised that we are looking at a site with one of the richest herbaceous flora typical of ancient arable fields. There are rare species growing at the site, which will be destroyed by the tree planting and the construction of a play area and visitor centre. We appreciate that the tree planting is at an advanced stage, with completion due in early 2019. However, it is not creating anything that resembles a woodland because that only happens when plant communities naturally succeed each other until a more-or-less stable system develops. A natural woodland would have an herbaceous ground layer, with many ecological niches for associated flora and fauna. The Woodland Trust is creating a plantation, with tree saplings being placed in rigid rows.

In summary, we are disappointed that the applicant has ignored various recommendations we have put forward and we feel that the residents of Ashtead

have been ignored. There is an immediate need to reassess the proposed traffic routes for both construction and visitors and, at the least, very serious consideration must be given towards the proven route for Derby Day traffic that has been approved by the Police and organisations familiar with the local road network.

We have misgivings about the location of the car park, visitor centre and play area and more attention needs to be given towards the horse racing establishments in Shepherds Walk. Therefore it is with regret that, on balance, we recommend refusal with too many unknown factors for us to add our support. Our immediate reaction, after a careful study, is to ask the Woodland Trust to reconsider the views expressed locally and comeback with a revised application for the relocation of the car park, visitor centre and play area.

Yours faithfully

*Roger Bennett*

Roger Bennett, Planning Officer