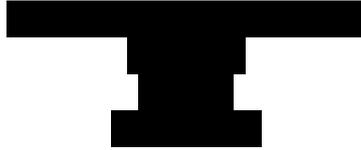


Ashtead Residents' Association



Head of Development Management
and Planning Enforcement
Epsom & Ewell Borough Council
(BusinessAdminHub@epsom-ewell.gov.uk)

22 February 2026

Dear Sir

**ASHTEAD RESIDENTS' ASSOCIATION - OBJECTION TO PLANNING
APPLICATION 25/01483/FUL – WOODCOTE STUD, WILMERHATCH LANE,
EPSOM**

1. The Ashtead Residents' Association objects to planning application 25/01483/FUL for the reasons set out as follows and submits that the application should be refused

Introduction

2. This proposal constitutes inappropriate and harmful development within the Metropolitan Green Belt. It involves:
 - The demolition of established equestrian buildings and one residential building;
 - The erection of 14 dwellings (including 5 affordable units);
 - The expansion of an existing Class C2 supported living use;
 - Associated access, parking, landscaping and drainage infrastructure.
3. The application fails to satisfy Green Belt policy, fails to demonstrate "Very Special Circumstances," fails to meet the evolving NPPF "grey belt" tests, undermines adopted local policy safeguarding equestrian land and employment, and raises serious concerns regarding openness, settlement merging, sustainability, surface water disposal and documentary consistency and accuracy.
4. It also raises concerns about the possible contamination of the Rye Brook which has water dispersed to it from the vicinity of the site from various ditches.

Strategic Green Belt Considerations

5. The site lies within a strategically critical section of Metropolitan Green Belt that performs an essential function in:

- Preventing the physical and perceived merging of Epsom and Ashtead;
 - Preserving openness along Wilmerhatch Lane and towards Headley Road, Ashtead
 - Maintaining the rural character associated with the equestrian industry on the periphery of both towns
 - Protecting ecological connectivity towards Ashtead Common National Nature Reserve, part of the Epsom & Ashtead Commons SSSI
6. This is not incidental Green Belt land, supposedly the target of the grey belt directive and considerations; it is geographically significant in maintaining separation between settlements across Borough and District boundaries.
7. The NPPF (2024) is unequivocal: inappropriate development is, by definition, harmful to the Green Belt and must be refused except in Very Special Circumstances. Substantial weight must be given to that harm.

Conflict with Previous Officer Assessment (Application 24/01439/FUL)

8. In January 2025, officers approved a retrospective change of use of two dwellings and one stable building to Class C2. Crucially, that approval was predicated on:
- No external alterations;
 - Preservation of openness;
 - Minimal and reversible change;
 - Retention of extensive equestrian infrastructure;
 - The ability to revert buildings to equestrian or C3 use;
 - Protection of the wider stud farm envelope.
9. Officers explicitly recognised:
- The importance of safeguarding equestrian employment (Policies CS11 and DM26);
 - The sensitivity of the Green Belt location;
 - The minimal spatial impact of internal alterations only.
10. The current proposal is fundamentally different. It seeks demolition of equestrian structures and residential buildings and their replacement with a dense residential form and expanded institutional use. This is not a reversible internal change of use; it is significant structural redevelopment.
11. To approve this scheme would require a material and unexplained departure from the Council's own recent policy interpretation and factual assessment of the site.

Inappropriate Development Under NPPF Paragraph 154

- 12 The proposal does not fall within any of the listed exceptions for development in the Green Belt:

- It is not agriculture or forestry.
- It is not outdoor recreation preserving openness.
- It is not a proportionate extension.
- It is not a replacement building, “not materially larger.”
- It is not limited village infilling.
- It is not rural exception affordable housing.
- It is not redevelopment that preserves openness.

13. The demolition of permeable equestrian structures and their replacement with conventional residential dwellings, domestic curtilages, garaging, hardstanding and associated infrastructure will materially reduce openness both spatially and visually.

14. The argument that the site constitutes “previously developed land” does not override the requirement that redevelopment must not cause substantial harm to openness. The proposed layout, density and urbanisation plainly do so.

Grey Belt and “Golden Rules” Tests Not Met

15. Even if the site were to be characterised as “grey belt,” the proposal must satisfy all parts of NPPF paragraph 155 as amended by the Green Belt PPG:

1. It must not fundamentally undermine the purposes of the remaining Green Belt;
2. There must be demonstrable unmet need;
3. It must be in a sustainable location;
4. It must meet the “Golden Rules,” including enhanced affordable housing.

16. This proposed development:

- Erodes strategic separation between Epsom and Ashted;
- Introduces a significant suburban form into a rural envelope;
- Is not located within a defined built-up area;
- Is reliant on private vehicle use;
- Provides only 5 affordable units (well below the enhanced threshold required under the transitional Golden Rules approach).

17. Accordingly, it fails the “grey belt” test.

Settlement Separation and Misleading Red Line Representation

18. There is a material discrepancy between diagrams presented within the Planning Statement and the formal Location Plan.

19. Some illustrative material portrays the site as an isolated parcel, implying limited impact on settlement separation. However, the formal red line boundary clearly extends across land forming part of the Green Belt buffer between Epsom and Ashted.

20. All land within the red line is subject to works - including drainage, attenuation and landscape alterations. Impact assessments must therefore consider the full envelope. Any technical report or spatial analysis relying on an artificially constrained footprint is unreliable.

21. This discrepancy raises legitimate concerns regarding robustness and transparency.

Loss of Equestrian Function and Policy Conflict

22. Policies CS11 and DM26 explicitly recognise:

- The economic and heritage value of the racehorse training industry;
- The need for caution in loss of equestrian employment land;
- The importance of maintaining viable equestrian facilities.

23. The prior officer report accepted that:

- Significant equestrian infrastructure remained;
- The stud farm retained capacity to resume operation;
- Minimal loss had occurred.

24. This proposal would materially dismantle that retained capacity. Demolition of equestrian buildings removes functional infrastructure and reduces the ability to reinstate the stud use.

25. The argument that the stud is currently non-operational is immaterial. Policy safeguards potential and strategic value, not merely current occupancy.

Openness: Spatial and Visual Harm

26. Green Belt openness is not solely volumetric; it includes:

- Spatial perception,
- Visual permeability,
- Activity levels,
- Domestic paraphernalia,
- Hardstanding and enclosure.

27. Replacing dispersed equestrian structures with 14 dwellings introduces:

- Domestic curtilages,
- Boundary treatments,
- Intensified vehicle movements,
- Lighting,
- Noise,
- Permanent residential activity.

28. The cumulative effect is suburbanisation. This materially alters the character of a currently rural and tranquil setting — a setting previously relied upon by the applicant to justify the suitability of the Class C2 supported living use.

29. The application is materially contradictory: it relies on tranquillity to justify C2 use while proposing development that will erode that very tranquillity.

Precedent Planning Inspectorate Appeal

30. A closely comparable Green Belt appeal concerning the redevelopment of Ashted Park Garden Centre for housing (APP/C3620/W/24/3347843, Mole Valley reference MO/2022/0474) was dismissed in April 2025. The Inspector concluded:

- The development was inappropriate;
- It caused harm to openness;
- It failed to satisfy the Golden Rules;
- Harm was not clearly outweighed by other considerations.

31. The reasoning applies with equal force here. The demolition of semi-open commercial or equestrian structures and replacement with housing restricts openness and contributes to settlement coalescence.

32. There is residential development much closer to Ashted Park Garden Centre than to Woodcote Stud where the proposal, if approved, could be interpreted as a “bridgehead” for further residential development in the Green Belt.

33. Consistency in Green Belt decision-making is essential to maintain policy integrity but, most importantly, public confidence in the planning system.

Sustainability and Transport

34. The site lies outside the defined built-up area where housing is directed under Core Strategy paragraph 3.11.

35. It is not within easy walking distance of:

- A comprehensive range of services;
- Reliable high-frequency public transport.

36. The E5 bus route is intermittent and cannot realistically substitute for private car use.

37. The addition of 14 dwellings and a 24-hour staffed C2 facility will materially increase vehicle movements on Wilmerhatch Lane, which already functions as a “rat-run” not only between Epsom and Ashted but around congested areas of both towns. At the Epsom end there is a particularly difficult junction at The Loop with Woodcote Side/Woodcote Green whilst at the Ashted end the Pleasure Pit Road, Farm Lane, Rookery Hill cross road has views obscured by listed walls and gate entrances.

38. The location does not meet the sustainability objectives of concentrating development in accessible urban locations.

Drainage and Ecological Considerations

39. The application includes works involving a drainage channel extending westward from the vicinity of Woodcote Stud Farm toward the Rye Brook. Rising on the west side of Woodcote Park the Rye flows about 1 kilometre north passing under the A24, Dorking Road, before flowing into the ecologically sensitive areas covered by Epsom and Ashted Commons site of special scientific interest.

40. The Rye then flows to the south of Ashted Woods National Nature Reserve past the Woodfield Open Grassland, which is carefully maintained, by the City of London Ashted Common Estate Wardens to strike a balance between nature conservation and recreation before transiting the Ashted Rye Meadows Wetlands, itself a site of nature conservation interest.

41. There are already long-established concerns among many authorities regarding the existing contaminated flow into the Rye.

42. Any discharge into a protected ecological corridor requires clear evidence of regulatory compliance and environmental protection. The application documentation does not robustly demonstrate that overflow risk is eliminated.

43. Given the ecological sensitivity of the downstream environments mentioned above, this is a material planning concern particularly when viewed in the context of the Government's many environmental recovery policy documents and its international commitments to comply with them.

Absence of Very Special Circumstances

44. Very Special Circumstances must clearly outweigh:

- Harm by reason of inappropriateness;
- Harm to openness;
- Harm to settlement separation;
- Loss of equestrian capacity;
- Transport unsustainability;
- Ecological risk.

45. The proposal provides no compelling, site-specific justification that meets the high threshold of very special circumstances.

46. The C2 use already operates within preserved buildings; affordable housing provision is limited and housing need, while recognised nationally, does not automatically override Green Belt protection without demonstrable exceptional justification.

47. No such case has been made by the applicant

Conclusion

48. Epsom & Ewell Borough Council has famously acceded to new developments on not only the sites of the former mental hospital complex(es) but part of its General Hospital too. Many former office locations and some public houses have disappeared to be replaced by housing and even major industrial locations have also gone the same way.

49. There seems to be an impression amongst some landowners, who knew at when they did so the restrictions which existed on the properties they were purchasing, that there is now a carte blanche to have those restrictions overturned.

50. It is essential in cases such as this that these restrictions are upheld lest Epsom & Ewell and Ashted become part of a continuous urbanisation stretching out from Greater London.

51. This proposal represents:

- Inappropriate Green Belt development;
- Material harm to openness;
- Erosion of strategic settlement separation;
- Conflict with adopted local policy;
- Failure to meet NPPF exceptions or grey belt tests;
- The absence of Very Special Circumstances.

52 Approval would undermine the permanence and integrity of this strategically important Green Belt corridor and set a precedent for incremental erosion leading, despite what may be the best of intentions now, to even greater losses in the future.

53. For these reasons, planning permission should be refused.

Yours faithfully

[Redacted Signature]

[Redacted Name]

Vice-Chairman
Ashted Residents' Association