

Planning – Application Comments

REF: 25/00846/OUT

Outline application for up to 110 dwellings including affordable homes (all matters reserved except access from Langley Vale Road.)

Farm View, Langley Vale Road, Epsom, Surrey KT18 6AP.

I ask that the following information to be considered by the planning officer and by my colleagues.

Declaration: I am an Epsom Downs Conservator, Chalk Stream Monitoring volunteer (South East Rivers' Trust) and chair of Surrey's Wildflowering Project.

London retains roughly 320 hectares of chalk grassland—just over 3% of the South East's total—distributed across Croydon, Bromley, Sutton, Hillingdon and Lewisham.

As a borough - and equally important - as a racing industry - we must aim to co-ordinate the protection, management and restoration of Outer London's chalk grasslands, while promoting wider understanding of the need for their conservation.

Chalk grasslands occur on shallow, lime-rich soils primarily found on the North Downs and the Chilterns. These nutrient-poor, free-draining habitats support a rich diversity of specialised wildflowers, grasses, butterflies and other invertebrates. Characteristic plants include red and sheep's fescue, quaking grass, wild thyme, marjoram and bird's-foot trefoil, alongside several orchids, many of which are nationally scarce.

The habitat is particularly important for butterflies such as grizzled and dingy skippers, chalkhill blue, dark green fritillary, marbled white and especially the small blue. Young developing scrub is included within the habitat definition, though mature scrub and early chalk woodland are excluded.

Historically, sheep and rabbits maintained the short sward essential for chalk grassland health. With the decline of grazing from the 19th century onwards, and the collapse of rabbit populations due to myxomatosis in the 1950s, scrub and woodland spread rapidly. Suburban expansion in the inter-war years caused further losses, although the creation of the Metropolitan Green Belt helped prevent major post-war development.

Some areas became public open space, while others were converted to arable land or heavily grazed by horses. Recognition of the habitat's biodiversity value has prompted new conservation initiatives, though scrub encroachment remains a dominant management issue.

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Many sites lie on the northern slopes of the North Downs. However, multiple pressures continue to affect the habitat. These include the widespread invasion of scrub due to

lack of grazing, fragmentation caused by development and agricultural change, and increased recreational use that leads to erosion and disturbance.

Problematic colonising species such as hawthorn, blackthorn, dogwood and bramble shade out specialist plants and reduce biodiversity. Additional impacts stem from road run-off, nutrient enrichment, pollution, fly-tipping, human occupation and the removal of rare species by collectors.

Four SSSIs in London are primarily composed of chalk grassland, with additional protection provided by Local Nature Reserve designation and multiple non-statutory nature conservation sites. The habitat supports various protected species, including greater yellow-rattle, early gentian, the small blue butterfly, common lizard, slow-worm, adder and badger.

Management initiatives include the replication of traditional agriculture. An example of best-practice solutions is the **Downlands Countryside Management Project**—whose mobile flock of sheep supports grazing across sites—and the **Countryside Stewardship Scheme**, which funds scrub clearance, fencing, grazing and arable reversion.

The plan identifies flagship species, such as pyramidal orchid, marjoram, quaking grass, marbled white butterfly and the yellow meadow-ant, as symbols of the habitat's ecological value. Four main objectives guide future action: identifying and mapping existing and potential chalk grassland; ensuring all sites are appropriately managed; implementing habitat creation and restoration; and promoting cultural and heritage appreciation of chalk grassland. Targets include establishing working groups, preparing management guidance, developing grazing schemes, restoring degraded areas and creating public information materials.

Overall, the plan calls for coordinated, long-term collaboration among conservation bodies, local authorities and land managers to secure the future of London's rare and ecologically significant chalk grasslands.

How could Epsom Downs benefit from this?

Epsom Downs is one of the largest remaining chalk grassland areas on the North Downs. It could benefit from this plan in several important ways. Here's a clear breakdown of the potential advantages:

1. Improved Habitat Management

The plan emphasises restoring and maintaining chalk grassland through appropriate, consistent management, particularly grazing and scrub control.

Benefits for Epsom Downs:

- Reintroduction or expansion of targeted grazing (e.g., sheep or conservation grazing) to maintain the characteristic short turf needed by chalk grassland species.
- Systematic scrub clearance, preventing hawthorn, blackthorn and bramble from overtaking open grassland.
- Access to expert management advice, helping managers tailor techniques to the site's specific needs.

2. Enhanced Biodiversity

Epsom Downs already supports specialised chalk flora and fauna. The plan's approaches—mapping species, identifying specialist needs, restoring the habitat—could help:

- Increase populations of scarce butterflies like the small blue, grizzled skipper or chalkhill blue.
- Improve conditions for orchids, quaking grass, marjoram, and other chalk specialists.
- Protect reptiles and invertebrates through improved vegetation structure.

This would strengthen Epsom Downs as a regional biodiversity hotspot.

3. Access to Funding and Support Schemes

The plan promotes participation in schemes such as the Countryside Stewardship Scheme, which funds:

- Scrub removal
- Grazing infrastructure (e.g., fencing, water troughs)
- Habitat restoration
- Arable-to-grassland conversion if relevant

For a landscape-scale site like Epsom Downs, these resources could support long-term ecological restoration at reduced cost.

4. Contribution from the Downlands Countryside Management Project (DCMP)

Epsom Downs lies near other DCMP-supported sites, and the plan encourages expansion of this work.

This could bring:

- Volunteer labour for practical tasks
- Access to the DCMP's roving flock of sheep
- Support from experienced chalk grassland managers

This shared resource model could make management more efficient and sustainable.

5. Reduced Fragmentation to promote Stronger Ecological Networks

The plan aims to identify and connect chalk grassland patches across London and the North Downs. For Epsom Downs, this could mean:

- Being integrated into a wider ecological network, improving species movement and genetic diversity.
- Creation of linked sites through restoration projects, making the Downs more resilient to climate change and isolation.

6. Greater Public Awareness would create Community Support

With objectives focusing on cultural heritage, public engagement and interpretation:

- Epsom Downs could benefit from new educational materials, signage and community outreach.
- Increased awareness may lead to reduced damaging behaviours (e.g., off-road biking, trampling) and greater volunteer involvement.

- A stronger connection between the public and the site's heritage could support long-term protection.

7. Strategic Planning, Better Protection

Mapping, auditing and identifying key species would help local authorities - and our East Surrey Unitary Authority going forward, to:

- Recognise Epsom Downs as a priority conservation area.
- Strengthen its protection in planning decisions.
- Ensure future development or land-use change does not impact its chalk grassland.

Epsom Downs could gain significant ecological, financial, and community benefits from the plan.

These include better habitat management, increased biodiversity, access to funding, coordinated grazing programmes, integration into a broader conservation network, enhanced public awareness and stronger long-term protection.

Overall, the plan provides a framework that could help Epsom Downs maintain and restore its valuable chalk grassland landscape for future generations.

Councillor Kim Spickett

Epsom and Ewell Borough Council