

Inspector's Matters, Issues & Questions (MIQs)

Matter 11 – Site Allocations

- 1.1 This Matter Statement has been prepared on behalf of Ms Toni Wilson in response to Matter 11, specifically in respect to the proposed allocation on land at Chantilly Way (Site SA33). Ms Wilson is the landowner and has promoted the site through each stage of the draft Local Plan.

Site SA33 – Land at Chantilly Way

Q13.11 – Should the capacity be described as a minimum?

- 1.2 Yes.
- 1.3 It is clear from the Council's evidence base the Local Plan does not seek to meet, by a considerable margin, the identified housing requirement for the Borough (for example, as made clear in paragraphs 3.2 / 3.7 of the Council's Housing Target (TP03)). Irrespective of the merits or not of this approach, as per paragraph 129a of the NPPF (2023), it is evident that the Council should be doing all that it can to optimise housing delivery on those sites that are proposed for allocation. It is not considered that the current wording of the allocation (or indeed those of other allocations) will achieve this and would therefore not be consistent with national policy on the matter.
- 1.4 In the case of Chantilly Way, information was submitted to the Council in April 2024 which included an analysis of the site constraints and opportunities to demonstrate how between 36 and 45 new homes were capable of being delivered at the site. A copy of this analysis is enclosed as Appendix 1. It is acknowledged that the detailed design is a matter that will be considered as part of any subsequent planning application however this work demonstrates that a greater quantum of development is achievable and deliverable at the site. On this basis, given the significant unmet housing need and to ensure sufficient flexibility, it is important that any allocation wording does not frustrate the ability to deliver a greater quantum of housing where this is consistent with other relevant policies. We therefore consider that capacity should be expressed as a minimum, or, like the housing target in Policy S1, be referred to as 'at least'.

Q13.12 – Are the references to the Grade II Listed Horton Farm House justified?

- 1.5 No.
- 1.6 We note that the Heritage Impact Assessment associated with the site (as set out on page 67 of the Heritage Topic Paper (TP06)) states that *"The site itself makes little contribution to Horton Farmhouse, being screened significantly by boundary treatment"*. For the reasons we set out in our Regulation 19 representations we would agree with this statement. The very brief assessment continues by acknowledging that there are no details of the proposals but states that proposals may have a degree of impact on the setting of the building although this is seemingly based on potential building heights. The assessment also considers that any heritage impacts, both positive and negative, are likely to arise based on the cumulative impacts of development of 1,250+ homes at Horton Farm (SA35) and not by development at the allocation alone.

- 1.7 It is clear that the Council's own assessment acknowledges that any heritage impacts arising from development at the site are tenuous at best, therefore there is no clear justification to support the inclusion of criterion c within the allocation text. As such, the requirements of Policy DM13 (Development Impacting Heritage Assets) provide sufficient certainty that any relevant heritage considerations, if any exist, will be appropriately considered and assessed at the planning application stage.

Appendix One – Site Capacity Analysis (submitted to EEBC in April 2024)



HORTON GROVE

Land at Chantilly Way, Epsom

Vision Document | March 2024

Rev A

Boyer



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Executive Summary

The 0.565 hectare (1.396 acre) site is located within the administrative boundary of Epsom and Ewell Borough Council (EEBC) in Surrey. The site provides an exciting opportunity to accommodate local housing needs in a sustainable location on an underutilised site, within a short walking distance of local services and facilities, with no major constraints.

The masterplan proposals (as shown later within the document) have been informed by a considered review of various technical disciplines including, but not limited to, highways; ecology; heritage; and landscape whilst also responding to the policy considerations set out in the NPPF as well as those contained in the adopted and emerging Local Plans and supporting planning policy documents.

The site, hereafter referred to in this document as Horton Grove, is allocated within the Draft Local Plan Regulation 18 Consultation (February 2023) under policy SA7 for net zero carbon residential development, deliverable by 2028. The site neighbours Horton Farm, which has been allocated for a minimum of 1,500 dwellings under policy SA6, which further demonstrates the need for local housing. The proposals for Horton Grove will therefore serve to seamlessly merge future development with the existing grain of Epsom.

We would encourage the Council to consider the characteristics of the site and the evidence supporting the development as outlined in this document. In doing this, it is clear that the site is available, suitable, sustainable and deliverable for residential development.

Horton Grove will provide an appropriate location to meet the local housing needs of Epsom, and the Borough as a whole, and create a high quality new development comprising between 36 to 45 new homes with accompanying landscaped spaces. The development will contribute towards the local need for affordable housing, with at least 40% of the dwellings to be delivered as either affordable rent or intermediate affordable housing tenures.

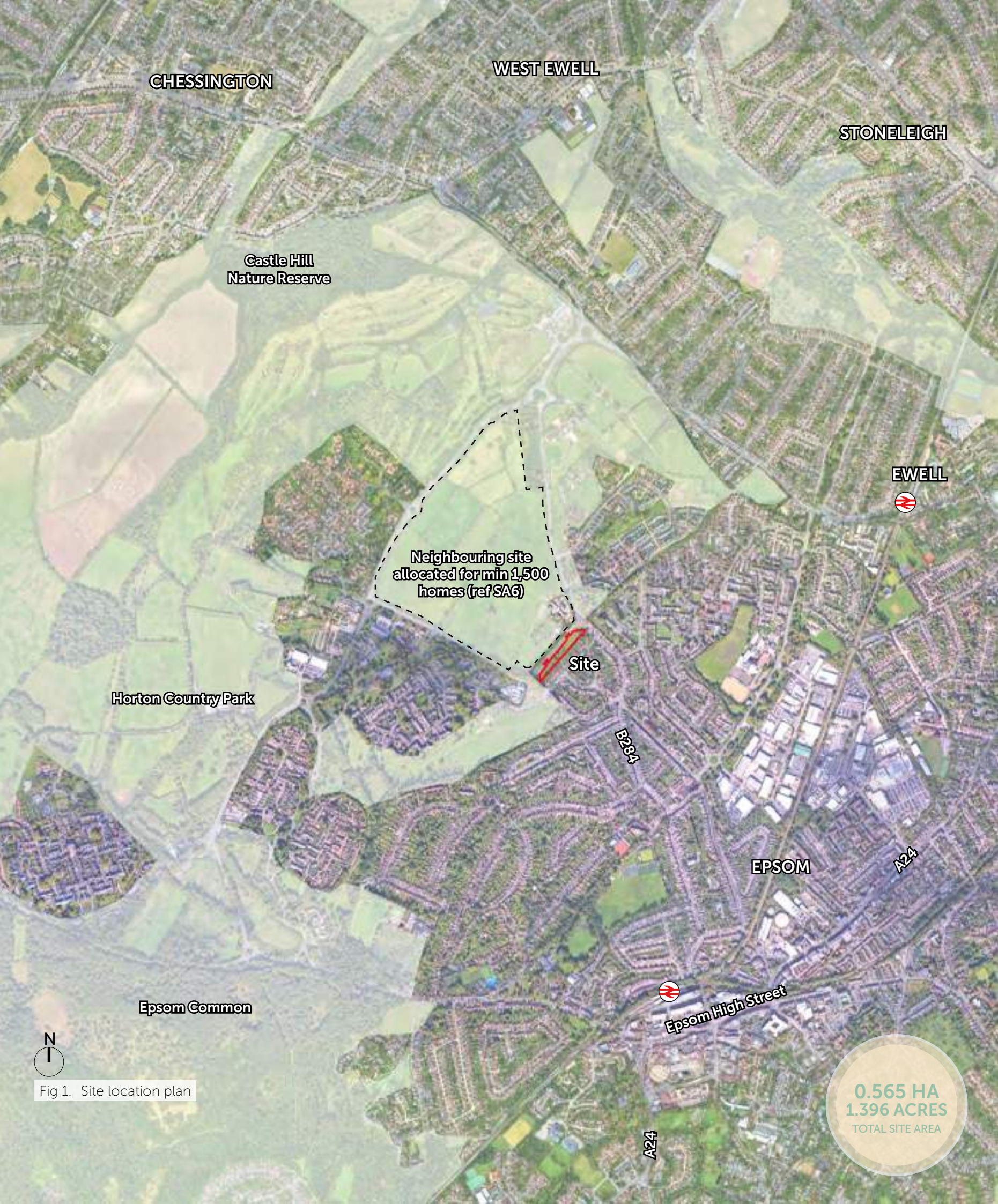


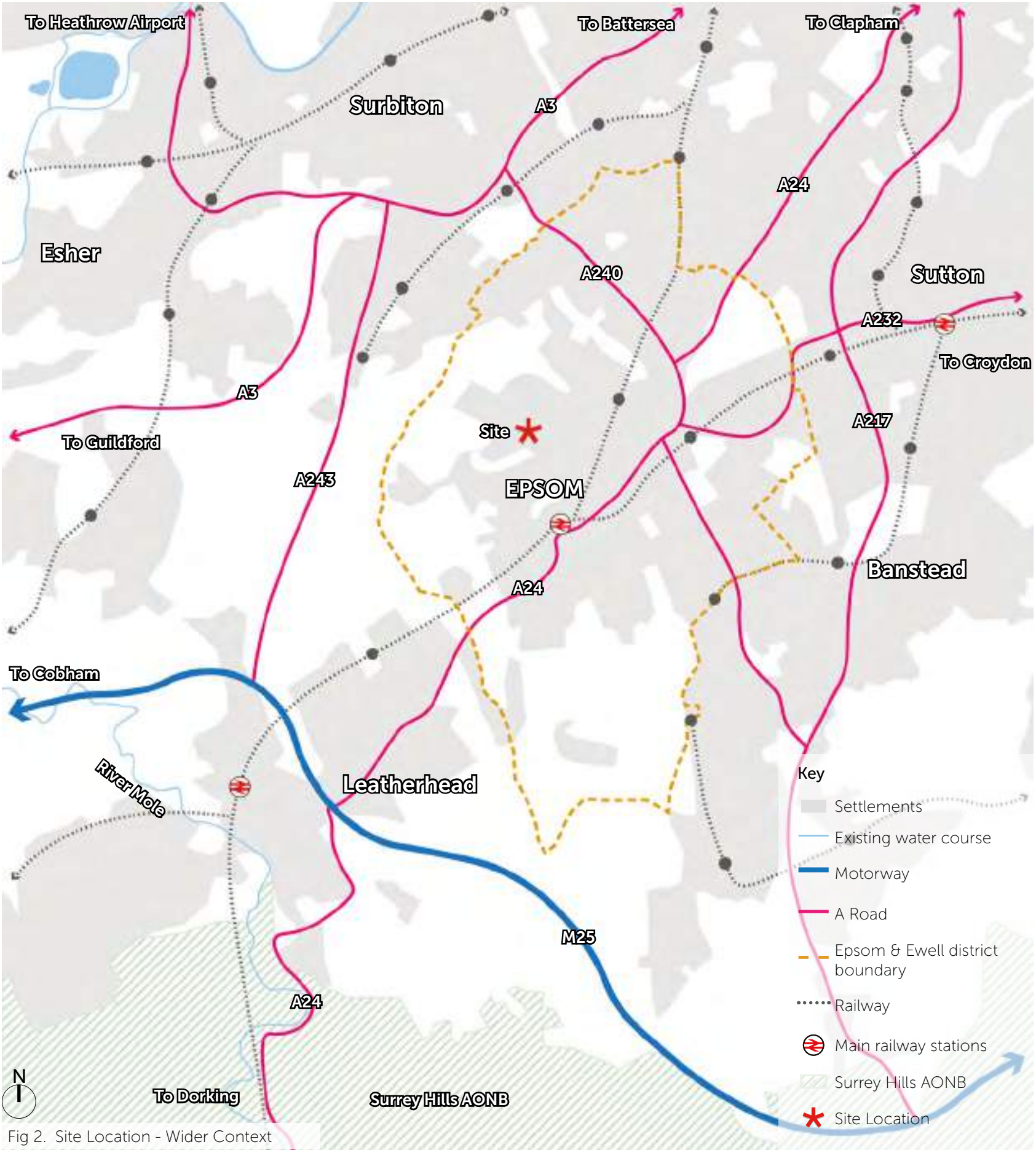
Fig 1. Site location plan

1.1. Wider Location

The town of Epsom is home to the historically important Epsom Downs Racecourse and is located within the Greater London section of Surrey. Epsom is located approximately 6km north east of Leatherhead, 5km west of Sutton and 4km south east of Chessington. Approximately 4km within the M25, Epsom lies along the key north-south route of the A24, providing vehicular connections north to Central London and south to Worthing.

Epsom provides further connections through an array of local bus routes and a well connected railway station. Local bus routes connect the outer areas of Epsom while Southern and South Western Railway trains connect Epsom with Guildford, Dorking, Horsham and a variety of London terminals; all within a 45 minute journey.

The site is located in the north west area of Epsom, on the south side of Horton Farm. Epsom currently lies within the Metropolitan Green Belt, however it is understood that the site will be released for residential development within the emerging Local Plan 2022-2040.



1.2. Wider Facilities

Located within a 20 minute walk of both Epsom and Ewell West railway stations, Horton Grove offers a sustainable location for future residents. The site is well connected to the centre of Epsom via the E5 local bus, as well as a variety of cycle and walking routes.

To the west, the Horton Retail Centre provides a variety of facilities, from local shops to sports facilities. Further west lies Horton Country Park and Hobbledown Adventure Farm Park and Zoo. Horton Grove will benefit from these local amenities as well as sustainable connections to the many facilities located within Epsom town centre.

Epsom consists of a number of primary and secondary schools, in addition to a University for the Creative Arts. Southfield Park Primary School is located to the immediate south west of Horton Grove, fronting onto Long Grove Park. The park is within a 5-minute walking distance of the site and features a well equipped formal play area, easily accessible and within a 5 minute walk for future residents of Horton Grove.



1.3. Understanding the Context

The site is within close proximity of a number of Conservation Areas, known as the Epsom Hospitals Cluster. It is important to analyse these areas as they are of high architectural value to the local area and therefore should be referenced in the proposals for Horton Grove.

The Conservation Areas include St Ebba's, Long Grove, Horton, The Manor, and West Park Hospital, as described in the Character Appraisal and Management Proposals (June 2009). These areas demonstrate Epsom's architectural history with many examples of 19th century buildings within the historic Horton Manor estate. The areas comprise predominately residential buildings amongst landscape setting with some historic trees retained.

The most relevant area to Horton Grove is Long Grove, located to the north within 10 minute walking distance. Long Grove comprises a former hospital, now Hunter Court, Prospect House and surrounding buildings designed by George Thomas Hine, and Clarendon Park. The buildings predominately feature red and stock brick along with clay tile, render and timber beam details.

A more recent housing development has expanded the Long Grove and Clarendon Park area. The new houses echo the architectural treatment of Hunter Court and the historic buildings within the Conservation Area. Red brick, tile and slate roofs and traditional fenestration details have been used to create an architecture that is sensitive to its historic context.

More late 19th/early 20th century housing can be found further south of Horton Grove on Hook Road. The road is predominately lined with two storey housing finished with decorative grey and red stock brick,



Fig 4. Villa within the Long Grove Conservation Area



Fig 5. A new build house within the Long Grove area



Fig 6. Three storey housing with traditional detailing



Fig 7. Victorian housing of Hook Road

The built fabric surrounding the site mostly comprises more recent development from the mid 20th century, along with intermittent examples of historical buildings. The area is predominately two and three storey. The development of Eastman Way to the west of the site comprises three storey apartments and can be seen from Chantilly Way. The development demonstrates a precedent for more dense housing development within close walking distance of the local amenities shared by Horton Grove.

The grade 2 listed Horton Farmhouse, which neighbours Horton Grove to the north, is bordered by a low level post and rail fence and dense vegetation. The listed building sits among several metal clad farm sheds and a collection of white render finished buildings. The gated entrance creates a grand presence on Chantilly Way. The farmhouse is another example of three storey building within immediate proximity of the site.

Architectural treatments of surrounding buildings include red, stock and brown brick as well as hung tile, boarding and render. Roofs are typically finished with tile and often have brick chimneys, while doors and windows are typically white upvc frames. Boundary treatments include mature tall hedges and vegetation, as well as close boarded fences and some low level brick walls.

The houses of Brettgrave which neighbour Horton Grove to the south east also originate predominately from the mid. 20th century. The road is comprised of semi-detached and stretches of terrace housing clad in red brick, render and some pebble-dash.



Fig 8. Three storey housing development on Eastman Way



Fig 9. Three storey Horton Farmhouse



Fig 10. Typical housing terrace of Hook Road



Fig 11. Typical render detail of Brettgrave

1.4. Understanding the Site

The site is located on the south side of Chantilly Way, backing onto existing properties of Brettgrave. The site is currently an open field formerly used as grazing land.

The majority of the site is around 1.5m lower than Chantilly Way. However, the south west corner is raised compared to the lowest point of the site at the north eastern end.

A variety of existing trees and hedgerows line the site's boundaries with Chantilly Way and Hook Road. The mature nature of the vegetation obscures views onto the site from both roads, as demonstrated in the adjacent views.



View 1 - site edge along Chantilly Way



View 2 - raised south western corner of the site



View 3 - full view of site edge from Chantilly Way



Fig 12. Key Plan - Views



View 4 - showing the gradient of the land

1.5. Summary of Site Characteristics

The physical characteristics of the site and potential access opportunities are illustrated in the diagram overleaf. The site is free from major constraints and is therefore viable for residential development.



Access

There is currently no access onto the site. Chantilly Way is the most obvious location for an all modes access as it is mostly topographically level with the site. It also hosts an existing designated cycle route and therefore can provide future inks to sustainable infrastructure. The access points must be adequate distance from the junction of Chantilly Way and Hook Road.



Edge Conditions

The site abuts existing settlement of Brettgrave along its south-eastern edge. Chantilly Way runs along the north western edge of the site and Hook Road along the north eastern. Existing trees and hedgerow adorn sites boundaries with Chantilly Way and Hook Road along with a post and rail fence, while trees and vegetation are mostly located within the rear gardens of properties of Brettgrave along the south eastern boundary.



Drainage

Located in Flood Zone 1, the site falls from a high point of around 45.5m AOD in the south western corner of the site to a low point of around 41.5m AOD in the central and north eastern part of the site. The nature of the topography leaves the site vulnerable to surface water flooding. The proposals of Horton Grove will therefore be accompanied by a sustainable urban drainage scheme that will manage surface water levels across the site to benefit both future occupants and existing neighbours.



Utilities

A sub station is located along the north east boundary of the site. Telecommunications boxes line the northern corner of the site, feeding the telecommunications mast of similar location. The proposed development will maintain these existing services while creating a safe environment for new housing.



Trees

The site is populated with a variety of trees and hedges. Existing vegetation along the site's boundaries with Chantilly Way and Hook Road will be retained. A mature Montezuma Pine tree located within the rear garden of neighbouring 38 Brettgrave is protected by a Tree Preservation Order (TPO ref: 392/T1). Illustrated in the diagram overleaf. The tree and its roots will be protected by the proposed development.



Context

Within 100m of the site lies the Grade II Listed, three storey Horton Farmhouse. The development will be required to actively consider this listed building and not inflict on its setting.

The neighbouring land to Horton Farm is allocated for a minimum of 1,500 new homes. This demonstrates the need for new housing in the area and gives an indication of the sites future context. The proposals at Horton Grove can therefore act as a bridge between existing development to the south east and potential new housing on the allocated Horton Farm site.



Fig 13. Montezuma Pine, subject of TPO 392/T1



Fig 14. Existing sub station abutting the site boundary



Fig 15. Site Characteristics Plan

2.1. Design Principles

Green & Blue Infrastructure



Fig 16.Green & Blue infrastructure diagram

- Semi-natural green spaces will be created around the periphery of the site, creating soft edges to neighbouring roads and Brettgrave.
- Pockets of private green amenity spaces are provided at strategic locations.
- A public green amenity space greets the southern access onto the site. This space will host a local area of play in the form of a naturalistic trim trail.
- An attenuation pond located at the north east end of the site at the lowest topographical point will mitigate surface water flooding.
- The existing trees bordering Chantilly Way and Hook Road will be retained and enhanced with new planting. The root protection area (RPA) of the neighbouring TPO will be maintained. New trees will frame the public amenity space and help soften the development.

- Key**
- Site boundary
 - Proposed semi-natural green space
 - Proposed private amenity space
 - Proposed public amenity space
 - Proposed local area of play
 - Proposed attenuation pond
 - Tree Preservation Order (TPO) - 392/T1
 - RPA of TPO
 - Trees to be removed
 - Proposed trees

Permeability & Movement



Fig 17. Permeability & Movement diagram

- There are two proposed access points onto the site from Chantilly Way. This is to create a one way vehicular system in and out of the site to minimise the potential impact on existing traffic movement.
- The access points also connect to the existing designated cycle route, creating links to the established sustainable infrastructure.
- The proposed primary street runs parallel with Chantilly Way and transitions to parking courtyards. This is to maximise the efficiency of the layout and keep new roads to a minimum.
- A proposed pavement enables pedestrian access to all parts of the site.

- Key**
- Proposed all modes access points
 - Chantilly Way
 - Designated cycle route
 - Proposed primary street
 - Proposed parking courtyards
 - Proposed pavements

Built Form



Fig 18. Built Form diagram

- The proposed development area is located towards the southeast edge of the site and backs onto the existing properties of Brettgrave. This is to reduce the visual impact of new development from Chantilly Way and provide privacy for future occupants and existing residents of Brettgrave.
- Building frontages are orientated to address Chantilly Way as well as the internal street to create active frontage and overlook green amenity spaces.
- Up to four storey buildings are located at either end of the development. These will provide visual nodes enabling orientation from surrounding Chantilly Way and Hook Road. Three and four storey development is justified by the site's surrounding context; particularly Horton Farmhouse and Eastmen Way, as elaborated in section 1.3, as well as separating distance from properties of Brettgrave.

- Key**
- Indicative building frontage
 - Proposed development area
 - Up to max three storey buildings
 - Up to max four storey buildings

2.2. Design Framework

The proposed development framework plan allows for the site to deliver between 36 to 45 dwellings with accompanying landscaped spaces. The evolving design framework seeks to achieve the following principles:



Landscape

- Creating pockets of green space helping to maximise opportunities for biodiversity enhancement and connections to nature.
- Retain existing trees to the north western and eastern boundaries to mitigate views onto the site from Chantilly Way and Hook Road
- Maintain the associated root protection area of neighbouring TPO of 38 Brettgrave.



Character and Identity

- The proposed built form and site layout responds to the surrounding context and local landscape character.
- The proposals address both Chantilly Way and public green spaces with active frontage. The layout respects the privacy of neighbouring properties of Brettgrave.
- Ensure the most effective use of land through appropriate scaling and massing, familiar to surrounding built vernacular.



Permeability and Access

- Promote accessibility and enhance connections to existing vehicle, pedestrian and cycle infrastructure to ensure a variety of forms of sustainable travel.
- Provision of recognisable routes to surrounding community features and amenities.



Supportive Infrastructure

- Ensure appropriate sustainable drainage measures are incorporated including levelling the site to reduce risk of surface water flooding.
- Provide proportionate and appropriate S106 and relevant contributions.



High Quality Design

- Ensure that public and amenity spaces are overlooked by buildings to provide a safe and secure environment.
- Provide accessible play spaces including a naturalistic trim trail to provide opportunities for social interaction and play for both future residents of Horton Grove and the existing surrounding community.
- Areas of public open space, formal and informal open space will be appropriately landscaped to ensure a sense of well-being.
- Through the detailed design process ensure the scale and density of the proposals reflect local context, including three storey development where appropriate.
- Ensure homes are adaptable to the changing requirements of the population, including all ages.
- Ensure a climate resilient development, with an aim of achieving a net zero carbon housing development.
- Provide a wide variety of dwellings types, including a range of tenures to provide a mixed and balanced community.



2.3. Illustrative Masterplan

The proposals make provision for between 36 to 45 new homes, comprising a mix of 1 and 2-bed apartments and 2 and 3-bed houses. Over 40% of the proposed housing provision will be delivered as affordable homes. These will be dispersed among the private market dwellings and will receive the same high quality architectural treatment to help promote a sustainable, inclusive and mixed future community for the site. 25% of the proposed provision will comprise 3-bed homes, in accordance with policy DM22 of the Local Plan.

All housing will be designed to comply with the nationally adopted Technical Space Standards as well as the local supporting planning documents.

- 1 All modes access points from Chantilly Way
- 2 Neighbouring TPO (ref: 392/T1)
- 3 Local area of play: naturalistic trim trail within public green amenity space
- 4 Attenuation pond to mitigate surface water flooding
- 5 Private green amenity space
- 6 New trees to soften parking courtyard
- 7 Primary internal street with pavement to one side
- 8 Two storey housing
- 9 Up to three storey housing
- 10 Up to four storey apartments



Conclusion

This Vision Document sets out the emerging proposals for Horton Grove. The proposals seek to provide a high quality residential development comprising between 36 to 45 new homes along with areas of landscaped space with new trees and planting. The vision outlined in this document demonstrates how the proposals respond to the call for sustainable housing on an underutilised site allocated for residential development.

The development will comprise a mix of houses and apartments, designed to sit well in relation to the site specific characteristics and to respect the surrounding buildings and landscape, creating a cohesive and sympathetic addition to the area. The proposed housing mix responds directly to local housing need and will represent a substantial contribution to the demand for local affordable housing.

The development will create pockets of natural green spaces along with a naturalistic pond which will enhance opportunities for biodiversity on the site. A publicly accessible trim trail will create opportunities for outdoor play and engagement with nature. All housing will be delivered as net zero carbon to mitigate the impact of the development on climate change.

The proposals are in accordance with local and national planning policy and guidance and propose a sensitive response to the site and the surrounding area. The proposals of Horton Grove are intended as an exemplar development that will create context responsive housing on a currently underutilised site. We would welcome the opportunity to meet with you and develop a dialogue to collaboratively work forward on the proposals.



Provides a wide range of new homes, responding to local housing need



Enhances links, providing footpaths and creating a sustainable and integrated community



Provides publicly accessible amenity space and naturalistic trim trail to the benefit of the surrounding area



Provides biodiversity net gain through sensitive landscaping and ecological enhancement



Low impact; creates a zero carbon development and sustainable homes for all



Creates a sustainable community with access to local facilities and nature

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