



**Sandown Park,
Esher**

**Green Belt
Review**

Prepared by:
**The Environmental
Dimension
Partnership Ltd**

On behalf of:
**The Jockey Club
Racecourses Ltd**

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Section 1

Introduction, Purpose and Background

Introduction and Purpose

- 1.1 The Environmental Dimension Partnership Ltd (EDP) has been commissioned by The Jockey Club Racecourses Ltd to undertake a Green Belt Review of land at Sandown Park, Esher to inform planning proposals and accompany an outline planning application.
- 1.2 EDP is an independent environmental planning consultancy with offices in Cirencester, Cheltenham, Shrewsbury and Cardiff. The practice provides advice in the fields of landscape, ecology, archaeology, arboriculture, masterplanning, rights of way and agricultural land matters. Details of the practice can be obtained at our website www.edp-uk.co.uk. EDP is a Registered Practice of the Landscape Institute¹ specialising in the assessment of the effects of proposed development on the landscape.
- 1.3 This Green Belt Review is part of a suite of documents accompanying a hybrid application for the proposed development. In summary, the application includes:
- Outline planning permission (with all matters reserved except for access to the development) is sought for:
 - Enhancement and rationalisation of existing racecourse facilities/infrastructure and car parking;
 - Re-location of an upgraded children's nursery (Use Class D1);
 - Development of a circa 150 room hotel (Use Class C1); and
 - Demolition of existing buildings/structures and residential development of approximately 318 dwellings (Use Class C3).
 - Full planning permission is sought for:
 - Racetrack widening to the southwest and east sections of the existing racecourse track, including associated ground levelling/earthworks to the southwest section, and re-positioning of fencing, and improvements to a section of the existing internal access road from More Lane, and
 - New bell mouth accesses serving the development.
- 1.4 As set out within the supporting Green Belt Statements and Planning Statements by Rapleys LLP and Design and Access Statement (DAS) by PRC Architecture, Sandown Park requires significant upgrades and enhancements of the existing racecourse infrastructure,

¹ LI Practice Number 1010

facilities and venues to secure a premier racecourse status for its long-term future and to improve the guest experience and community provision. A review of the potential enhancements and rationalisation of the racecourse has led to the identification of potential sites for residential development on a small proportion of Sandown Park, without having a detrimental impact on racing operations or the Green Belt. These sites will provide the opportunities to contribute to Elmbridge Borough's housing needs and the release of the sites will enable the capital raised to be reinvested into the business to deliver Sandown Park's vision to secure its long term successful future.

- 1.5 **Plan EDP 1** illustrates the location of the Racecourse and its boundaries. Each of the development sites are located within Sandown Racecourse, itself located within close proximity to the centre of Esher. The northern boundary of the Racecourse is defined by existing residential development, with a mainline railway beyond. The eastern, southern and western boundaries are largely defined by vehicular corridors and existing built form associated with the urban context of Esher. Sandown Racecourse is located within the administrative boundaries of Elmbridge Borough Council Local Planning Authority.
- 1.6 The purpose of this Green Belt review is to assess the extent to which each of the development parcels and the Racecourse performs, and will perform in the context of the development proposed in terms of the five purposes of the Green Belt, as stated in paragraph 134 of the National Planning Policy Framework (NPPF).
- 1.7 EDP's work has included the following key items:
- A review of the planning documentary context for the site, including the 'Elmbridge Green Belt Boundary Review', produced on behalf of the Council by ARUP in 2016;
 - A desktop study and web search of relevant background documents and maps. EDP's study has included reviews of aerial photographs, web searches, LPA publications and other landscape character assessments;
 - A field assessment of local site circumstances, undertaken by a Chartered Landscape Architect, including a photographic survey of the character and fabric of the site and its surroundings; and
 - A broad 'Development Response' exercise, which considers potential development parameters in relation to the constraints identified within the Green Belt review and baseline studies.

Section 2

Site Appraisal and Green Belt Review

Introduction

- 2.1 This Green Belt Review forms part of the suite of documents prepared by the applicant to demonstrate that bringing forward development within the Racecourse, as identified within the supporting Green Belt Statement, will allow the key purposes of the Green Belt, in the context of Esher and its local context, to be maintained. This review considers the extent to which a continued sense of openness can be maintained within the tract of land which forms the Racecourse and provides suggestions on land use parameters to help achieve this (**Section 3**).

Site Appraisal

- 2.2 EDP's separate Landscape and Visual Appraisal (report **edp5237_r002**) provides a further assessment of the character of the Racecourse and its townscape, and wider landscape, context. However in summary, as illustrated within the aerial image provided at **Plan EDP 2**, the Racecourse includes a number of uses within its central areas which, owing to mature landscape features at the edges of the racecourse, are seen by few receptors. These facilities include a go-kart track, a golf centre and a number of smaller buildings. Where views into the racecourse are possible, the Racecourse fencing and jumps, and facilities associated with horse racing, create a busy and somewhat cluttered character to it. However, as referenced by the Elmbridge Local Plan Design and Character SPD, the lack of large built form within the central areas of the Racecourse enables '*impressive long views towards London*'.
- 2.3 A brief summary of each of the individual development parcels, as set out within the supporting planning statement to the application, is provided below:
- **Site 1:** The 0.24 hectare (ha) site contains stables (for existing overflow provision) on the southern boundary with access taken from More Lane. To the north is a wooded area known as 'The Warren' containing leisure/recreation facilities. The western part of the site is located within Esher Conservation Area with a group of four listed buildings to the west of the site (Cobblestones, Orangery, Garden Reach Cottage and listed walls), and one listed building to the south (Ekwalls) on Esher Green;
 - **Site 2:** The 0.42ha site is existing parking area for the racecourse, with pedestrian access to the site provided via steps to Portsmouth Road at the south western corner which also provides pedestrian links to the parade of shops and facilities in Esher high street. The site's boundary along Portsmouth Road is defined by a tree line and timber fence. There is a Grade II listed Traveller's Rest located adjacent to the southern boundary, with the Grade II Sandown House opposite;

- **Site 3:** The 0.42ha site is located on the north-western end of the racecourse, with access taken from Lower Green Road and the perimeter road within the racecourse. The site consists of single and two-storey detached houses providing racecourse staff accommodation. Immediately to the north of the site are trees and vegetation, beyond which are residential dwellings, including three locally listed buildings (144 and 146 Lower Green Road). To the east, are maintenance compounds serving the racecourse;
- **Site 4:** The 0.5ha site is a redundant area in the eastern corner of Sandown Park Racecourse, immediately to the north of a Café Rouge restaurant off Station Road which provides access to the site. The site's perimeter has some vegetation and trees, with its southern edge falling within flood zone 2. The site is less than 250m from Esher Railway Station. There are no heritage designations on the site however there is a listed and scheduled monument, Milestone (White Lady) located 30m south;
- **Site 5:** The 0.94ha site contains two buildings occupied by a Class D1 children's nurse to the north-east and coach parking area for the racecourse. The site also contains the locally listed Toll House and its grounds and is accessed off Portsmouth Road. There are few mature trees and vegetation within the boundary of the site, with a landscape buffer screening the site from the racecourse to the north. The site is delineated by high timber fencing at all sides. There are two listings in close proximity to the site. Adjacent to the southern boundary is the Grade II listed coal tax post and to the south-west are the Grade II listed gates and railings to Sandown Park Racecourse;
- **Site A:** The 2.27ha site contains the main operational area and facilities for the racecourse, which comprises a pre-parade ring, stable blocks, saddling enclosures, and a hardstanding area for horsebox unloading and car parking. It also contains Sandown Park Lodge, a two-storey brick building providing a canteen and accommodation (21 bedrooms) for stable staff during race meetings;
- **Site B:** The 0.3ha site is located to the east of the existing Grandstand, on a predominantly hard standing area overlooking the racecourse. The site adjoins the existing car park and is accessed from Portsmouth Road;
- **Site C:** The 3.6ha site is located in the centre of the racecourse and contains a kart track, hard surfaced parking area and associated facilities. The site adjoins the golf course and driving range structure to the north; and
- **Site D:** The 4.2ha site is located in the centre of the racecourse, to the west of Site C. The area contains a hard-surfaced parking area for the golf centre to the north, and a grassed area which is used for parking during race meetings. There is an internal access road to the site from More Lane.

2.4 In addition to the above, the key elements of the local built context have been discussed within EDP's Landscape and Visual Appraisal and provided here within a number of Photoviewpoints (refer to **Appendix EDP 2**). This is further supported by **Plan EDP 3** and **Plan EDP 4** which set out the local landscape character and visual context.

- 2.5 From a sensory perspective, the Racecourse is relatively unremarkable within the wider landscape. It does not form a prominent, or important, part of the appreciation of the wider landscape, and is perceived as open space for the purposes of recreation and equine use in close proximity to existing residential properties and the urban context of Esher. In landscape/townscape terms, despite local topography within the Racecourse suggesting otherwise, namely high ground on The Warren, there is a very limited sense of association between the Racecourse and the wider setting; being divorced both physically and visually from it by mature vegetation, a railway line and large areas of built development.

Landscape Related Designations

- 2.6 The Racecourse is not located within or on close proximity to any landscape related designations that would constrain development.

Green Belt Review

Background to the Green Belt Designation

- 2.7 The reasons for designating the Metropolitan Green Belt (MGB) in the 1950s and 1960s were set out in 1955 by the Ministry of Housing and Local Government as being:
- To check the further growth of a large built up area;
 - To prevent neighbouring towns from merging into one another; and
 - To preserve the special character of a town.
- 2.8 In 1962, the Minister of Housing and Local Government published the advice booklet titled 'The Green Belts'. The booklet recorded that the last of the Home Counties development plans had been approved in 1959, enabling the completion of the Metropolitan Green Belt. An updated 'The Green Belts' booklet was published in 1988.
- 2.9 The Surrey Structure Plan 1978 considered a Green Belt distance of approximately 19-24km (12-15 miles) sufficient to contain the outward sprawl of London. Following local government reorganisation in 1972 and the merger of Esher Urban District Council with Walton and Weybridge Urban District Council to create the Borough of Elmbridge, the Green Belt boundaries were subsequently reviewed during the preparation of the 1993 Local Plan, which established precise boundaries throughout the Borough for the first time.
- 2.10 The NPPF presents updated policy which requires land to demonstrate that it contributes towards these two essential characteristics of openness and permanence by meeting one or more of five purposes, or 'tests', of Green Belt designation, which are set out at Paragraph 134 as follows:

1. *“To check the unrestricted sprawl of large built-up areas;*
2. *To prevent neighbouring towns merging into one another;*
3. *To assist in safeguarding the countryside from encroachment;*
4. *To preserve the setting and special character of historic towns; and*
5. *To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”*

Elmbridge Borough Council Green Belt Review

- 2.11 At a local level, Elmbridge Borough Council undertook a Green Belt Review as part of the evidence base to support the Elmbridge Local Plan. It undertook two stages of assessment: first, a strategic review of the Elmbridge Green Belt within the wider Metropolitan Green Belt context; second, a local review of identified Green Belt parcels to identify the relative performance of the Green Belt against the NPPF defined purposes of the Green Belt.
- 2.12 In assessing both the Strategic and Local Areas, and learning lessons from other Green Belt Reviews, the EGBR states that *‘Only those purposes deemed relevant to the local context have been used in reviews rather than necessarily using all five’*. This resulted in only Purposes 1-3 being assessed, with Purposes 4 and 5 not being assessed². As such, this Green Belt review will adopt the same approach and not undertake any further consideration of Purposes 4 or 5.
- 2.13 According to the *Elmbridge Green Belt Boundary Review (EGBR) (2016)*, the two stages of assessment identified two tiers of Green Belt land, namely:
- **“Strategic Green Belt Areas (Strategic Areas)** – *Broad areas for the Strategic Green Belt Area Assessment, identified largely through commonalities in landscape character and natural constraints or barriers that distinguish between different parts of the Green Belt, and functional connections with the wider Metropolitan Green Belt”*; and
 - **“Local Green Belt Areas (Local Areas)** – *More granular parcels for the Local Green Belt Area Assessment against the NPPF purposes.”*
- 2.14 The Racecourse has been identified as falling within Strategic Area A, which the EGBR summarises as:

² According to the EGBR, *“It was determined that Purpose 4 was not relevant to the Elmbridge Green Belt Boundary Review given that there were considered to be no instances where historic towns/cores directly abutted the Green Belt and where the Green Belt played a functional role in the setting of such historic settlements.”* In relation to Purpose 5, the EGBR stated that *“during engagement with the Council, it was confirmed that there are no planned urban regeneration schemes that were being inhibited by Green Belt designations.”* As a result, Purpose 5 was also excluded from the assessment.

“Strategic Area A is a narrow and fragmented band of Green Belt which closely abuts the very edge of south-west London, stretching from Heathrow Airport to Epsom. This strategically important arc of green spaces provides a narrow break between the built-form of outer London and a series of Surrey towns, including Walton-on-Thames, Hersham, Esher and Claygate in Elmbridge.

*As Green Belt, the Area’s key roles are with respect to Purposes 1 and 2, meeting both of these **very strongly**. It acts as an important barrier to potential sprawl from the Greater London built-up area and a number of large built-up areas within Surrey, including several within Elmbridge, and establishes important gaps between a number of Surrey towns, preventing their merging into one another and the Greater London built-up area. However, it meets Purpose 3 **weakly** due to the fragmented nature of the Green Belt and the prevalence of man-made/industrial uses.*

The importance of the Strategic Area as part of a wider Green Belt network must be acknowledged, yet there is a sense that in some of the more fragmented and/or degraded parts of the Green Belt change could be accommodated without causing any further harm to its integrity.”

- 2.15 While this is useful, as set out within the EGBR, the consideration of Strategic Areas ‘initially considered these two assessment levels discreetly’, with the outputs of this assessment informing ‘the detailed recommendations for the smaller Local Areas’. Therefore, as is to be expected, the findings of the more detailed Local Areas are more relevant to the Racecourse and its context.
- 2.16 At a local level, the Racecourse has been identified as falling within Local Area 52, as illustrated below in **Image EDP 2.1**.



Image EDP 2.1: The Racecourse can be seen as forming Local Area 52

2.17 In defining Green Belt boundaries, as stated by the EGBR, *'permanent man-made and natural features have been selected as the basis of criteria for the identification of the Local Areas.'* However, although stated as being based on *'site visits and discussions with Council officers'*, the EGBR includes many elements of large built form within the southern areas of the Racecourse within the Green Belt designation, particularly the inclusion of the grandstand and built elements to the south-west of it. As such, it is not considered that the extent of Local Area 52 is based on durable boundary features, particularly *'Existing development with strongly established, regular or consistent boundaries'* as stated by the EGBR.

2.18 The results of the EGBR review for Local Area 52 is provided below in **Table EDP 2.1:**

Table EDP 2.1: EGBR Green Belt Assessment of Local Area 52

Purpose	Criteria	Assessment	Score
(1) To check the unrestricted sprawl of large built-up areas	(a) Land parcel is at the edge of one or more distinct large built-up areas.	The land parcel is at the edge of the large built up areas of Thames Ditton (which forms part of the Greater London Built-Up Area) and Esher.	PASS
	(b) Prevents the outward sprawl of a large built-up area into open land and serves as a barrier at the edge of a large built-up area in the absence of another durable boundary.	The land parcel is connected with the large built-up area of Greater London, preventing its outward sprawl into open land. The boundary between the land parcel and the built-up area of Thames Ditton is durable and permanent, consisting of a railway line and the Lower Green Road.	3
Purpose 1: Total Score			3/5

Purpose	Criteria	Assessment	Score
(2) To prevent neighbouring towns from merging	Prevents development that would result in merging of or significant erosion of gap between neighbouring settlements, including ribbon development along transport corridors that link settlements.	The land parcel forms part of the essential gap between the non-Green Belt settlements of Greater London (Thames Ditton and Lower Green) and Esher. Despite its small size, the local area maintains a relatively open character and provides an important visual gap between the two settlements. Development in the land parcel would likely result in their coalescence.	5
Purpose 2: Total Score			5/5
(3) Assist in safeguarding the countryside from encroachment	Protects the openness of the countryside and is least covered by development.	14% of the land parcel is covered by built form. Sandown Park Racecourse is located in this land parcel. The land is comprised of managed, private open space with a number of buildings and hard standing structures dispersed across the site. While the racecourse maintains a high level of openness, the concentration of structures and hard standing linked to the racecourse, the motor racing circuit and the managed nature of the land contribute to a semi-urban character.	3
Purpose 3: Total Score			3/5

2.19 As can be seen above, it is acknowledged that the Racecourse (with EDP emphasis):

*“Is comprised of managed, private open space with **a number of buildings and hard standing structures dispersed across the site**. While the racecourse maintains a high level of openness, the concentration of structures and hard standing linked to the racecourse, **the motor racing circuit and the managed nature of the land contribute to a semi-urban character.**”*

2.20 However, while EDP agrees that the Racecourse exhibits a semi-urban character, with many off-site urbanising features which reduces its representativeness of the countryside (a score of 1 according to EDP’s methodology) it is largely its role in relation to Purpose 2, with the EGBR identifying the highest score rating of 5, that results in the Local Area performing ‘strongly’ in Green Belt terms. According to the EGBR, those areas considered to perform strongly are those meeting at least one of the purposes with a score of 4 or 5.

2.21 Therefore, the key test is not necessarily whether the proposed development would lead to a reduction in openness by encroaching onto neighbouring countryside, particularly given the urban context of the Racecourse, but whether the development proposed would reduce the Green Belt function of the Racecourse as set out at Purpose 2, namely preventing towns from merging and therefore protecting existing gaps between towns.

Green Belt Review of Development Proposals

The Proposed Development

- 2.22 The Planning Statement, and supporting Design and Access Statement, accompanying this hybrid planning application provides full details of the development proposals.
- 2.23 The outline element of the application (with all matters reserved aside from access), includes the following operational enhancement and facilitating proposals:
- **Site A** (Racecourse Operational Facilities) – redevelopment and rationalisation of the stables, the paddock area, pre-parade ring, horse box parking area and re-provision of stable staff accommodation and associated facilities;
 - **Site B** (Hotel) – the erection of a 150-room hotel (Class C1);
 - **Site C** (Family/Community Zone) – Remodelling of the existing kart track area to accommodate a new family/community zone including outdoor recreational areas and cycle track and indoor soft play and ancillary café buildings;
 - **Site D** (Rationalisation of Car Park) – improvement of the car park through the establishment of grasscrete surface or similar and hard standing in part, within the centre of the site. Access shall continue to be provided via More Lane;
 - **Site F** (Car Parking Improvements) – improvements to the existing car parking and amendments to layout through soft and hard landscaping, including relocation of the existing broadcasting compound, turnstiles/kiosk elsewhere within Site F and installation of a new ring main unit;
 - **Site 1** (Residential Mews) - demolition of the existing facilities to be replaced by new flatted mews development of circa 15no. residential units (Use Class C3), associated access off More Lane, parking, and landscaping. Building height ranges between two to three storeys, comprising a mix of one and two beds;
 - **Site 2** (Residential Urban Frontage) – demolition of the existing buildings to be replaced by new flatted development of circa 49no. residential units (Use Class C3) fronting Esher High Street with associated access, parking, and landscaping. Building height will range from three to four storeys, comprising a mix of one, two and three beds. The parking area will be covered by a landscaped deck over;
 - **Site 3** (Residential Villas) – demolition of existing buildings to be replaced by new residential villa development of circa 108 residential units (Use Class C3) fronting the racecourse, with and associated access off Lower Green Road, parking and landscaping. The buildings will be three storeys in height, comprising a mix of one and two beds;
 - **Site 4** (Residential Crescent) – development of circa 72no. new residential units (Use Class C3), associated access off Station Road, basement parking, and

landscaping. Building heights will be split into three elements – four storeys, five storeys and six storeys, comprising a mix of one, two and three beds; and

- **Site 5** (Residential Villas and Day Nursery/Community Use) – development of circa 68 no. new residential units (Use Class C3) and re-provision of a Class D1 children’s nursery with associated access, parking and landscaping. Separate accesses are proposed to serve the residential use off Portsmouth Road. The access to the proposed nursery will continue to be accessed via the main entrance to Sandown Park Racecourse. The flatted residential development comprises four storeys comprising a mix of one, two and three beds. The new nursery comprises two storeys.

2.24 The full element of the application includes the following:

- The full element of the application relates to the proposed racetrack widening (**Site E**). The proposal is to widen the two bends (the southwest and east) of the existing racecourse track. The proposals primarily involved a minor ground levelling, relating to the southwestern section only, and repositioning of the white fence.

The Impact on Openness

2.25 It has been established by case law (Appeal Ref APP/P2935/A/14/3000634) that openness is defined by ‘*an absence of buildings or other forms of development.*’ However, the case of Turner³ is important here as it makes clear that a visual dimension should be included within any Green Belt Assessment.

2.26 As illustrated on **Plan EDP 2**, much of the Racecourse contains existing built form, particularly areas to the south-west of, and surrounding, the Grandstand. In addition, existing built form on the northern boundary, namely existing residential bungalows within Site 3, extends to the south of mature tree cover aligning Lower Green Road.

2.27 As set out within the case of Turner “*there are a range of spatial factors, of which volumetric matters may be a material concern, but they are by no means the only one*” (paragraph 14). In addition, the Turner case confirms that “*openness can have a visual dimension*”, although “*an absence of visual intrusion does not in itself mean that there is no impact on the openness of the Green Belt*” (paragraph 25).

2.28 With reference to “*how built up the Green Belt is now and how built up it would be if redevelopment occurs*” (paragraph 14) and the visual dimension of openness, this is discussed further below.

Sites A, 1 and 2

2.29 Sites A, 1 and 2 are all located to the south-west of the existing Grandstand which, in combination with existing topography on the Warren, serves to separate each of the sites

³ John Turner v Secretary of State for Communities and Local Government and East Dorset District Council [2016] EWCA Civ 466

from the main areas of the Racecourse. In addition, each of the sites contain numerous elements of built form with limited sense of openness. As such, development within them would not change the perception of openness within the Racecourse overall, nor would it reduce the perceived 'essential gap' between Esher and developed land to the north of the Racecourse.

Site B

- 2.30 As illustrated on **Plan EDP 1**, Site B is located immediately to the east of the existing Grandstand and the development proposed is circa a 150-room C1 hotel, or a 130-room C1 hotel with approximately 9no. residential units (Use Class C3) above.
- 2.31 The location of the existing Grandstand largely divorces parts of Portsmouth Road from the central areas of the Racecourse. Essentially, where views are available, the Grandstand serves as the perceived northern edge of built form within Esher. However, at the location of the old gates to the racecourse, and slightly east of the gates as illustrated in **Photoviewpoint EDP 7** of EDP's LVA (refer to **Appendix EDP 2**), views from Portsmouth Road over the central areas of the Racecourse are possible to its northern boundary, which is essentially seen as a separate settlement edge. The introduction of development within Site B would serve to reduce the length of Portsmouth Road from where this view can be appreciated. However, development in this location would not be seen to reduce the perceived or actual distance between settlements but limit the location from which this separation could be experienced, albeit from a short section of a busy and urbanised vehicular corridor.
- 2.32 As such, the site is considered to be located within the urban settlement, being at the northernmost edge of the perceived extent of Esher. Development in this location would not lead to the perceived coalescence of settlements, albeit reducing the location very slightly from which views of the northern boundary of the Racecourse can be seen. However, as set out within EDP's LVA, views between Portsmouth Road and the northern boundary would remain, being framed by development within Site B.

Sites C and D

- 2.33 Sites C and D are both located within the central areas of the Racecourse which, as set out within the EGBR, is noted as being:
- “Comprised of managed, private open space with a number of buildings and hard standing structures dispersed across the site. While the racecourse maintains a high level of openness, the concentration of structures and hard standing linked to the racecourse, the motor racing circuit and the managed nature of the land contribute to a semi-urban character.”*
- 2.34 While this reduces the sense of openness to a degree, as illustrated in **Photoviewpoint EDP 3** and **4** of EDP's Landscape and Visual Appraisal (refer to **Appendix EDP 2**), existing built form is low in both scale and height. As such, although an

existing Go-Kart track and large areas of hard standing are considered to be detracting features, a general sense of openness remains.

- 2.35 The proposed development within Sites C and D would remodel the existing kart track, reducing its impact as part of a new 'family zone' which would include outdoor recreation facilities and soft play and ancillary café buildings. Given the scale of the development proposed, being similar to that of the existing built context, with the beneficial effect of replacing large areas of hard-standing with surfacing with a softer aesthetic, namely Grasscrete or similar, there would not be a material increase in built form within the central areas of the racecourse from that of the existing baseline.
- 2.36 In addition, landscape mitigation would respond to the perception of openness in views from More Lane, and from within the Racecourse itself, as well as responding to local landscape character. This includes addressing long views experienced from higher ground on More Lane and from within the Racecourse, towards London in the distance.

Sites E and F

- 2.37 Development within Sites E and F include the widening of the racetrack, in two key areas, and the improvement of the parking facility to the south-east of the Grandstand.
- 2.38 In both cases, given the nature of the proposed development within Sites E and F, essentially rationalising the existing context with the proposed land use remaining as existing, the change proposed would be considered the addition of elements not uncharacteristic within the existing landscape and, in visual terms, would be similar to the existing baseline situation.
- 2.39 The proposed development would not change the perception of openness within the Racecourse overall, nor would it reduce the perceived 'essential gap' between Esher and developed land to the north of the Racecourse.

Site 3

- 2.40 The development of Site 3 is sited on previously developed land where a number of existing residential developments are present. Although the site is located adjacent to an existing settlement boundary, mature landscape features on the southern side of Lower Green Road do provide some degree of separation to existing built form within the main body of the site. However, despite existing built form being relatively low in height and scale, it results in a loose boundary to the Green Belt, further south than that considered by the EGBR.
- 2.41 The proposed development would not extend the existing residential use any further south which, as illustrated on **Plan EDP 2**, would retain an existing gap of approximately 480m. The proposed development would reduce the sense of openness within the site itself, requiring a greater footprint of built development and being larger in scale to that of the existing. In addition, the increased massing of the proposed development from that of the existing would increase the visual association between the northern and southern

edges of the Racecourse, essentially the land deemed to form the 'essential gap'. However, the proposed landscape strategy for Site 3 provides a new defensible boundary to the northern edge of the Racecourse, more-so than the existing boundary, serving to contain that part of the site.

- 2.42 Due to the increased intervisibility with the nearest 'settlement edge', namely the perceived northern built context of Esher being formed by the Grandstand, there would be a degree of a reduction in the sense of openness within the Racecourse. However, with the retention of a gap of approximately 480m, the Racecourse's function in providing an 'essential gap between settlements' would remain.

Site 4

- 2.43 Site 4 is located at the eastern edge of the Racecourse, adjacent to Station Road. A close board fence aligning Station Road largely prevents intervisibility between the site and road users and pedestrians on Station Road. In addition, mature landscape features on the northern boundary of Site 4 provides a continuation of the existing development extent of commercial properties at the southern boundary of the Racecourse. As such, development here would largely continue the existing development extent formed by these commercial units.
- 2.44 While proposed development here would serve to bring development at the southern boundary of the Racecourse closer to its northern boundary, as illustrated on **Plan EDP 2**, the role of mature landscape features on the northern boundary serve to limit the association between the site and the Racecourse. As such, while there would be an absolute loss of openness within the site itself, the sense of openness within the Racecourse is unlikely to be adversely affected.
- 2.45 Site 4 adjoins an existing perceived settlement edge and is not divorced from it. The presence of mature landscape features on its northern boundary creates a soft settlement edge. The site itself, located to the south of these mature landscape features, does not contribute to the perceived separation between settlements. Intervisibility between the site and surrounding built form to the south urbanises it and, owing to the enclosure of the site by existing mature landscape features, development of it would not change the perception of openness within the wider setting.

Site 5

- 2.46 Similar to the effects on openness arising from Site B, Site 5 is largely perceived as part of the existing urban context, comprising a children's nursery and areas of hardstanding associated with the Racecourse. Although largely being perceived as part of the settlement, in relation to EDP's methodology, the site abuts two settlement boundaries and therefore forms part of an indent, reducing its function in Green Belt terms.
- 2.47 Due to closeboard fencing at the southern edge of Site 5, intervisibility between it and Portsmouth Road is extremely limited. As such, there is little, if any, sense of openness from Portsmouth Road where it bounds the Site. However, further west, at the location of

the old gates to the Racecourse, a greater sense of openness is gained from Portsmouth Road due to views looking north. Although the development would not obscure views into the Racecourse from Portsmouth Road for receptors travelling west, there would be a degree of enclosure for receptors travelling east. As such, proposed development at the western end of Site 5 has been reduced in scale and height to limit visual intrusion.

- 2.48 The introduction of development within Site 5 would serve to marginally reduce the length of Portsmouth Road from where views to the northern edge of the Racecourse can be appreciated. However, development here would not be perceived to ‘*reduce the perceived or actual distance*’ between settlements but reduce the location from which this separation could be experienced, albeit from a short section of a busy and urbanised vehicular corridor.
- 2.49 As such, the site is considered to be located within the urban settlement, being at the northernmost edge of the perceived extent of Esher. Development in this location would not lead to the perceived coalescence of settlements, albeit reducing the location very slightly from which views of the northern boundary of the Racecourse can be seen. However, as set out within EDP’s LVA, views between Portsmouth Road and the northern boundary would remain, being framed by development within Site 5.

The Overall Impact on the Openness

- 2.50 The consideration of the openness set out above, illustrates that large parts of the Racecourse are perceived, in a visual sense, as part of the urban context, providing a limited contribution to the purposes of maintaining an “*essential gap between the non-Green Belt settlements of Greater London (Thames Ditton and Lower Green) and Esher*”. As illustrated on **Plan EDP 2**, the perceived separation between settlements, provided by the function of the Racecourse, would remain.
- 2.51 A summary of the impacts on openness arising from each of the development sites is set out below in **Table EDP 2.3**.

Table EDP 2.3: Summary of the Spatial Impact on the Perception of Openness

Site	Built Volumes (existing / proposed)	Impact on Openness	Summary
A	4,800 m ³ / 8,900m ³	Development proposed would not change the perception of openness within the Racecourse overall, nor would it reduce the perceived ‘ <i>essential gap</i> ’ between Esher and developed land to the north of the Racecourse.	There would be an increase in built form within the Site. However, it is a previously developed site located to the south-west of the existing Grandstand which separates it from the main areas of the Racecourse. The proposals, being of an appropriate land use, would not harm the openness of the Green Belt. Overall, the proposals are considered appropriate in landscape and visual terms.

Site	Built Volumes (existing / proposed)	Impact on Openness	Summary
B	0m ³ / 27,950m ³	<p>The site is located adjacent to the existing Grandstand.</p> <p>Development in this location would not lead to the perceived coalescence of settlements, albeit reducing the location very slightly from which views of the northern boundary of the Racecourse can be seen from Portsmouth Road.</p> <p>As such, the perceived 'essential gap' between Esher and developed land to the north of the Racecourse would remain.</p>	<p>There would be an increase in built form within the Site. However, it is a previously developed site being well-related to existing built context. While development of the site would restrict views to the northern boundary of the Racecourse to a degree, it would not lead to the perceived coalescence of settlements. The proposals would not harm the openness of the Green Belt. Overall, the proposals are considered appropriate in landscape and visual terms.</p>
C	3,000 m ³ / 2,500m ³	<p>Given the scale of the development proposed, being similar to that of the existing built context, with the beneficial effect of replacing large areas of hard-standing with surfacing with a softer aesthetic, namely Grasscrete or similar, there would not be a material increase in built form within the central areas of the Racecourse from that of the existing baseline.</p>	<p>Reduction in built form within the Site. The proposed development would largely be seen to replace existing built form, including the replacement of a large area of hardstanding in the form of an existing go-kart track. The site is considered previously developed land and the proposals would not harm the openness of the Green Belt. Overall, the proposals are considered appropriate in landscape and visual terms.</p>
D	0m ³ / 0m ³	<p>Given the scale of the development proposed, being similar to that of the existing built context, with the beneficial effect of replacing large areas of hard-standing with surfacing with a softer aesthetic, namely Grasscrete or similar, there would not be a material increase in built form within the central areas of the racecourse from that of the existing baseline.</p>	<p>No built form proposed. The proposed development would largely be seen to replace existing built form, including the replacement of a large area of hardstanding. The site is considered previously developed land and the proposals would not harm the openness of the Green Belt. Overall, the proposals are considered appropriate in landscape and visual terms.</p>
E	0m ³ / 0m ³	<p>Given the nature of the development proposed, being similar to that of the existing built context, there would not be a material increase in built form within the central areas of the Racecourse from that of the existing baseline.</p>	<p>The proposed development would extend the existing race track. The site is not previously developed land and no built form is proposed, therefore, the proposals would not harm the openness of the Green Belt. Overall, the proposals are considered appropriate in landscape and visual terms.</p>

Site	Built Volumes (existing / proposed)	Impact on Openness	Summary
F	0m ³ / 9m ³	Development proposed would not change the perception of openness within the Racecourse overall, nor would it reduce the perceived 'essential gap' between Esher and developed land to the north of the Racecourse.	A previously developed site located to the south-east of the existing Grandstand. The proposals, being of an appropriate land use, would not harm the openness of the Green Belt. Overall, the proposals are considered appropriate in landscape and visual terms.
1	2,200m ³ / 5,300m ³	Development proposed would not change the perception of openness within the Racecourse overall, nor would it reduce the perceived 'essential gap' between Esher and developed land to the north of the Racecourse.	There would be an increase in built form within the Site. However, it is a previously developed site located to the south-west of the existing Grandstand which separates it from the main areas of the Racecourse. The proposals would not harm the openness of the Green Belt. Overall, the proposals are considered appropriate in landscape and visual terms.
2	3,200m ³ / 18,100m ³	The site is well-related to the urban context of Esher. Development proposed would not change the perception of openness within the Racecourse overall, nor would it reduce the perceived 'essential gap' between Esher and developed land to the north of the Racecourse.	There would be an increase in built form within the Site. However, it is a previously developed site located to the south-west of the existing Grandstand which separates it from the main areas of the Racecourse. The proposals would not harm the openness of the Green Belt. Overall, the proposals are considered appropriate in landscape and visual terms.
3	1,750m ³ / 33,750m ³	Due to the increased intervisibility with the nearest 'settlement edge', namely the perceived northern built context of Esher being formed by the Grandstand, there would be a degree of a reduction in the sense of openness within the Racecourse. However, with the retention of a gap of approximately 480m, the Racecourse's function in providing an 'essential gap between settlements' would remain.	There would be an increase in built form within the Site. However, it is a previously developed site with some separation from the existing built context by mature landscape features. Proposed development would have a greater impact on openness to that of the existing built context. Overall, the proposals are considered inappropriate in landscape and visual terms.

Site	Built Volumes (existing / proposed)	Impact on Openness	Summary
4	0m ³ / 30,050m ³	Site adjoins an existing perceived settlement edge and is not divorced from it. The presence of mature landscape features on its northern boundary creates a soft settlement edge. The site itself, located to the south of these mature landscape features, does not contribute to the perceived separation between settlements and development of it would not change the perception of openness within the wider setting.	There would be an increase in built form within the Site. Although the site is well-related to existing built context and does not contribute to the perceived separation between settlements, it is not previously developed land and would be considered new building in the Green Belt. However, overall, the proposals would not harm the openness of the Green Belt and the function of the Racecourse as an 'essential gap between settlements'. Overall, the proposals are considered appropriate in landscape and visual terms.
5	1,200m ³ / 8,150m ³	The site is considered to be located within the urban settlement, being at the northernmost edge of the perceived extent of Esher. Development in this location would not lead to the perceived coalescence of settlements, albeit reducing the location very slightly from which open views can be experienced from Portsmouth Road. Development of the Site would not change the perception of openness within the wider setting.	There would be an increase in built form within the Site. However, it is a previously developed site being well-related to existing built context and does not contribute to the perceived separation between settlements. The proposals would not harm the openness of the Green Belt. Overall, the proposals are considered appropriate in landscape and visual terms.

2.52 With regard to the consideration of the primary concern of openness, being whether and to what extent the land is free from development, a matter considered further within a supporting planning statement, it is clear that the proposed development would, overall, increase the volume of built form within each of the development parcels. However, it is also clear that built form is already present within parts of the Racecourse.

2.53 With the exception of Sites C, D and 3, due to their location, each of the sites listed above play a limited role in forming the “essential gap between the non-Green Belt settlements of Greater London (Thames Ditton and Lower Green) and Esher”, as defined by the EGBR. These areas of the Racecourse exhibit a semi-urban character, with many off-site urbanising features which reduces its representativeness of the countryside. As such, although an increase in built form is proposed within Sites A, B, E, F, 1, 2, 4 and 5, in all cases the proposals would not harm the openness of the Green Belt in landscape and

visual terms. As illustrated on **Plan EDP 2**, the perceived existing ‘*essential gap between settlements*’ would remain unchanged.

- 2.54 However, in relation to Site 3, largely due to its location, through the increase in massing of built form within it, and due to the increased intervisibility with the nearest ‘settlement edge’, namely the perceived northern built context of Esher being formed by the Grandstand, there would be a degree of a reduction in the sense of openness within the Racecourse. As such, in landscape and visual terms, development within Site 3 would be considered inappropriate.
- 2.55 For Sites C and D, both are located within the central areas of the Racecourse and, as illustrated above, there would be a reduction in built form within Site C and no built form at all within Site D. As such, for those sites which are located on land that would clearly be deemed to form the “*essential gap between the non-Green Belt settlements*”, there would be an overall reduction in built form. Therefore, for these sites, the proposals would not harm the openness of the Green Belt.

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Section 3

Summary and the Potential Development Response

Summary

- 3.1 This report provides an analysis of the Green Belt circumstances of Sandown Park, Esher, in order to review how a number of potential development sites within and around it contribute to the function of the Green Belt.
- 3.2 The Council's own Green Belt review identifies that *'the concentration of structures and hard standing linked to the racecourse, the motor racing circuit and the managed nature of the land contribute to a semi-urban character.'* It is largely its role in relation to Purpose 2, with the highest score rating of 5 according to the Council's assessment, that results in the Local Area performing 'strongly' in Green Belt terms. In this regard, the Council's Review states that:

"The land parcel forms part of the essential gap between the non-Green Belt settlements of Greater London (Thames Ditton and Lower Green) and Esher. Despite its small size, the local area maintains a relatively open character and provides an important visual gap between the two settlements. Development in the land parcel would likely result in their coalescence."

The Potential Development Response

- 3.3 EDP's LVA, and supporting landscape strategy plans, essentially provide a set of 'development parameters' within which any development proposed would need to 'fit' in order to be as respectful as possible to the existing planning and environmental baseline. The proposed masterplan illustrates how development on the site could progress in a manner which respects neighbouring land uses. It does this in the following ways:
- As set out on the Illustrative Masterplan, new tree planting is proposed in key areas of each of the development parcels. In addition to enhancing the existing landscape framework, this will assimilate the proposed built form and, through the use of appropriate species and quantities, address the site's relationship to the local context;
 - Setting back the proposed development from Station Road, namely at Site 4, would maintain the green, well-treed, characteristics of the eastern edge of the Racecourse;
 - Setting back the proposed development from Portsmouth Road at Site 5, being supported by new tree planting along the southern boundary and the retention of a locally listed Tollhouse, would maintain the approach to Esher on Portsmouth Road, particularly where open views are possible through the old gates to the Racecourse;

- Within the central areas of the Racecourse, the removal of an existing go-kart track, and its supporting infrastructure and built form, would be replaced with a number of new outdoor spaces, including an open park, landscaped gardens and a cycle track for children. Along with the benefits of removing the kart track from the central areas of the racecourse, opportunities exist for enhancing new open green space with new landscape features which would seek to maintain the 'green' nature of the internal areas of the Racecourse;
- Save for site access and internal access roads, existing boundary hedgerows and trees within each of the development parcels will be retained where possible (with buffers to development), reinforced and brought into regular, long-term management. This will protect visual amenity and landscape character as well as continuing to offer commuting and foraging opportunities for protected species;
- Provision of structural landscaping, native trees and shrubs that reflect the local context, including additional planting within proposed public open space throughout the scheme to maintain a buffer to the local landscape context. Within the northern areas of the site, namely at Site 3, existing landscape features will be reinforced with additional planting measures in order to maintain the 'green' setting to Lower Green Road and the character of the perceived well-treed residential context to the north; and
- The landscape strategy will include native plant species of local provenance and characteristic of the local landscape character to enhance the landscape and ecological value of the proposed development green infrastructure.

Overall Summary

- 3.4 As is discussed in **Section 2**, the findings of the review undertaken clearly demonstrate that each of the development parcels could be brought forward without detrimental harm to the overall function of the Racecourse, perceptually, as an 'essential gap' between Esher and developed land to the north of the Racecourse.
- 3.5 In terms of potential landscape and visual effects, as set out within EDP's Landscape and Visual Appraisal submitted as part of the application, the limitation in views available of a proposed development in this location confirms that development on the site would have little, or no, effects upon either sensitive or non-sensitive receptors, with any change limited to public receptors passing along Portsmouth Road and More Lane, and a small number of adjacent residential dwellings.
- 3.6 This review provides a clear indication that, with the exception of Site 3, in landscape and visual terms, each of the sites are entirely suitable for development within the Green Belt, without resulting in any material adverse effects on Green Belt function as identified within the NPPF, or on the local landscape character or the amenity of local visual receptors. This results primarily from the clearly demarcated boundary features, existing

uses within the site, the enclosed nature of the Racecourse in the wider context and the consequential limitation in landscape and visual effects.

- 3.7 With regard to Site 3, development here would increase in massing of built form within it, and there would be a degree of a reduction in the sense of openness within the Racecourse. As such, development within Site 3 would be considered inappropriate in landscape and visual terms.
- 3.8 Development within Site 4 would be considered new development on a previously undeveloped site, although with very limited effects upon openness overall such that development would be considered appropriate in landscape and visual terms. However, as set out within the Green Belt Planning Statement, submitted in support of the application, each of the development sites are not being developed in isolation. Instead, they are part of a broader package of enhancements to the racecourse and its outdoor recreational and supporting development. In this respect, only one of the development sites would be considered to be inappropriate development within the Green Belt in landscape and visual terms.
- 3.9 Overall, a development which seeks to address the constraints of the site would contribute to retaining the openness of the Green Belt by providing much needed housing on a site where Green Belt function would not be compromised in landscape and visual terms, whilst also providing a sustainable and high-quality development which links very well to the existing context.