

RAPLEYS

Planning Statement for
Jockey Club Racecourses Ltd

**SANDOWN PARK RACECOURSE
PORTSMOUTH ROAD
ESHER
KT10 9AJ**

22 February 2019

Our Ref: CB/385/12/6

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QUALITY ASSURANCE

This report has been prepared within the quality system operated at Rapleys LLP according to British Standard ISO 9001:2008.

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2 INTRODUCTION

2.1 This Planning Statement (the “Statement”) has been prepared on behalf of Jockey Club Racecourses Ltd (“JCR”) in respect of improvement works at Sandown Park Racecourse, Portsmouth Road, Esher, KT10 9AJ (Site Location Plan at **Appendix 1**), in support of a masterplan-led hybrid application across a series of individual sites. Essentially, the works are for a number of enhancements to the racecourse, facilitated by residential development.

Outline planning application (with all matters reserved except for access to the development) 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 application 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 bellmouth accesses serving the development.*

STRUCTURE OF PLANNING STATEMENT

2.2 This Statement explores the key considerations relevant to the proposals and is set out as follows:

- Chapter 3: The Applicant and Sandown Park Racecourse;
- Chapter 4: Vision;
- Chapter 5: Site and Surroundings;
- Chapter 6: Planning History;
- Chapter 7: The Proposal;
- Chapter 8: Planning Policy and Guidance;
- Chapter 9: Pre-Application Engagement;
- Chapter 10: Planning Considerations, and
- Chapter 11: Planning Benefits, and
- Chapter 12: Conclusions.

CONTENTS OF PLANNING APPLICATION

2.3 This Statement should be read in conjunction with the following supporting documentations submitted as part of this application:

- Site Location Plan (Ref: PL_001);
- A suite of Application Drawings:
 - Parameter Plans (covering access, height and refuse, prepared by PRC);
 - Indicative Layout Plans, prepared by PRC;
 - Indicative Zoning Plans, prepared by PRC;
 - Technical Bell Mouth Access Drawings, prepared by TPP, and
 - Track Widening Drawings, prepared by Professional Sportsurf Design.
- Drawing Schedules;
- Accommodation Schedule (dated 18/02/2019), prepared by PRC;

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- Masterplan Document (February 2019), prepared by PRC;
 - Design and Access Statement (February 2019), prepared by PRC;
 - Planning Statement (including phasing plan), prepared by Rapleys LLP;
 - Green Belt Statement, prepared by Rapleys LLP;
 - Green Belt Review, prepared by EDP;
 - Viability Report, prepared by Rapleys LLP;
 - Archaeological and Heritage Assessment, prepared by EDP;
 - Landscape/Townscape, Visual Appraisal and Landscape Strategy, prepared by EDP;
 - Statement of Community Involvement, prepared by Rapleys LLP;
 - Sustainability and Energy Statement, prepared by Element Sustainability;
 - Environmental Noise Report, prepared by Sharps Redmore;
 - Lighting Assessment, prepared by Graham White Lighting Consultancy;
 - Preliminary Arboricultural Impact Assessment (including tree survey, tree retention and removal plans), prepared by Tyler Grange;
 - Preliminary Ecological Appraisal and Preliminary Bat Roost Assessment and HRA Screening Document, prepared by Tyler Grange;
 - Site Waste Management Statement, prepared by Rapleys LLP;
 - Utilities Report, prepared by Waterman;
 - Drainage Report with Flood Risk Assessment (where appropriate), prepared by Hafren Water, and
 - Phase 1 Geotechnical Report, prepared by Listers Geo.

2.4 Whilst the proposals do not constitute EIA development (as set out with Elmbridge Borough Council's Screening Opinion Ref: 2018/3728), the application is also supported by an Environmental Statement, which is focussed on issues of transport and air quality and includes the Construction Environmental Management Plan. This has been co-ordinated by Rapleys LLP with technical input provided from TPP, Redmore Environmental and Blue Sky Building.

2.5 The above submissions conclude that the proposed development is acceptable, and supportable in planning terms.

3 THE APPLICANT AND SANDOWN PARK RACECOURSE

JOCKEY CLUB RACECOURSES

- 3.1 JCR is the largest racecourse group in the UK by turnover and attendances, with a focus on hosting the highest quality Flat, Jumps and All-Weather Track racing. It currently operates 14 racecourses in the UK, including internationally renowned courses at Cheltenham, Aintree (home of the Grand National), Epsom (home of the Derby) and Newmarket.
- 3.1 JCR is governed by Royal Charter and re-invests all of its profits into British Racing as a sport, which includes investment in the long term development and enhancement of its racecourse facilities and venues. JCR recognises the need to operate an efficient and diverse business to secure its long term future by delivering an offer of non-racing activities, to secure reinvestment in the enhancement and regeneration of its racing venues.
- 3.2 JCR has invested significantly into the redevelopment and renewal of Cheltenham Racecourse and the redevelopment of the grandstand at Epsom Downs Racecourse, and has seen a major success through these upgrades and enhancements to the facilities. JCR is therefore experienced in delivering its vision to secure a long term future for its venues, and is seeking to repeat its success at Sandown Park Racecourse.

SANDOWN PARK RACECOURSE

- 3.3 Sandown Park Racecourse is a Jump and Flat racing venue, owned and operated by JCR, and hosts 25 racing fixtures annually. Since 1875, the primary function of Sandown Park as a sporting venue and visitor attraction has brought a range of economic and benefits - notably job creation - to the local economy:
- The Racecourse attracts approximately 120,000 visitors to the 25 racing fixtures per annum (including Music Nights).
 - As one of JCR's regional hubs, Sandown Park employs 110 permanent staff through the year-round employment of administrative staff and other staff for the operation of 25 race meetings.
 - In addition to the permanent staff, the Racecourse employs around 4,000 stewards, car park attendants, cleaners for race meeting operations, as well as 280 catering staff per meeting.
 - A wide range of training opportunities are offered by the Racecourse to its staff.
 - The Racecourse uses a variety of contractors and service providers for the operation of race meetings, events and maintenance.
 - The Racecourse generates a significant number of indirect jobs, for example in the racehorse training industry.
- 3.4 A significant number of visitors are also attracted to Sandown Park each year through the hosting of non racing events. It hosts approximately 300 complementary non-racing events such as conferences, weddings, banqueting and public exhibitions, attracting between 118,000 to 128,000 visitors per annum.
- 3.5 Notwithstanding the current number of visitors Sandown Park attracts and its significance, the business faces a number of challenges to its long term success, including:
- The existing racecourse infrastructure is ageing and absorbs a significant maintenance spend;
 - Investment is required to maintain a competitive race programme and to raise its position as a world class racing venue;
 - The existing buildings require upgrading to ensure that the venue keeps pace with the future needs of users and visitors, and

- The visitor experience requires investment to retain existing customers and to attract new audiences from the wider community.

CURRENT FACILITIES

3.6 As confirmed above, the existing infrastructure at the racecourse is ageing and need substantial investment. Examples of this include:

The stables and associated facilities

3.7 JCR's annual structural survey from October 2018 highlighted a number of issues and defects in the existing stables. This repeated findings from previous surveys going back a number of years.

3.8 The stables consist of a number of single storey buildings including a veterinary first aid unit, a sampling unit, 110 stable units, toilet block, along with tack boxes, security office and storage units. The stable block was built over a number of years dating back to the 1930's and some parts even earlier.

3.9 The stables are nearing the end of their economic life, run down and in need of work in a number of areas. The timber is rotting in many places and generally in need of repainting to prevent further deterioration. Electrical installation, drainage and water supply are all areas needing upgrades.

3.10 A number of other works are required to ensure ongoing welfare standards, including the need for replacement stable staff accommodation (as the existing lodge requires significant investment over the forthcoming years to maintain operational delivery, is it and its facilities/infrastructure are at the end of their lives) and newly re-aligned pre-parade ring, as well as horsebox drop off and saddling boxes.

The racetrack

3.11 The provision of the best possible track conditions is key for Sandown Park's future and for maintaining a competitive and high quality race programme. The scheme provides for widening of the racing surface at two important areas of the track, which allows us to put on an improved and safer racing product.

3.12 Another key part of these works are improvements to the course crossing, currently a tarmac surface, covered for racing using coconut matting. This is a crude and unsustainable solution, and in the long term must be updated to meet modern standards and expectations.

The Grandstand

3.13 The current Grandstand was opened in 1973 and, at that time, was a first class example of multi-use venue. Now 45 years old, grandstand infrastructure does not meet current needs of JCR's race day or event customers. Further, the Grandstand incurs increasingly significant maintenance costs each year in order to continue to operate and deliver at its current level. This ongoing cost does not contribute to enhancements to our customer proposition.

3.14 At the same time other sporting arenas, stadiums and leisure attractions nationwide are seeing significant levels of investment to sustain their future and offer the highest level of customer experience to attract new and retain existing customers, meaning a challenging marketplace is becoming increasingly competitive.

3.15 This is confirmed by recent research of Sandown Park customers (September 2018), which identified that our facilities do not meet their needs or expectations.

4 THE VISION

4.1 As a critical leisure destination and employer in Elmbridge, JCR's vision is to enhance this role, continue to play a key role in the local community and meet modern customer standards and expectations. In this context, JCR's overall vision for Sandown Park Racecourse is:

“To deliver a competitive and sustainable future for Sandown Park Racecourse”

4.2 In order to achieve this, the following three objectives have been identified, with the first two delivered by the third:

1. A higher quality racing programme and guest experience;
2. Wider and improved community provision, and
3. Racecourse enhancements to existing built environment and infrastructure.

4.3 These are explored in further detail below.

Delivering a higher quality racing programme and guest experience

4.4 Research has shown how racing needs to compete with all other leisure activities. JCR has continued to look at ways to improve the quality of the racing at Sandown Park. The investment is underpinned by the need to retain existing, but also attract new, racegoers to the racecourse. This, in turn, will assist in securing investment in prize money thereby further improving the race card and guest experience.

4.5 It is also recognised that the cultural heritage of the existing facilities plays a role in the guest experience, which will require a sensitive approach to investment and balanced consideration.

4.6 Specifically, JCR is seeking to provide:

- The highest quality fixture list throughout the year by maintaining a high number of runners per race, which is both competitive and attractive to racegoers.
- An enhanced guest experience of racecourse facilities and new on-site hotel on surplus land to contribute to the offer at Sandown Park and address the current deficient of visitor accommodation within Esher and wider locality.

4.7 To deliver this vision, which can underpin Sandown Park as a premier racing venue, it is therefore necessary to deliver a sustained package of investment and improvements through the enhancement of the built environment. Without this, Sandown Park Racecourse cannot remain competitive with other venues.

Wider and Improved Community Provision

4.8 In parallel to improving the race card and guest experience, JCR recognise the current need to enhance the year round provision and offer at Sandown Park Racecourse for families and wider local community outside of race days. Identified initiatives include:

- Refurbishment improvements to facilities and technology offer, including the exhibition spaces within the Grandstand.
- A new family zone to include a café, indoor/outdoor play facilities, children's cycle track, to be open to the public year-round.
- Re-provision of an upgraded children's nursery.
- Better integration between Sandown Park Racecourse, Esher Town Centre and railway station.

4.9 In addition to the above, the golf centre, ski and leisure centre and skywalk within the grounds of Sandown Park Racecourse shall continue to be open to the public.

Enhancing the existing built racecourse environment

- 4.10 At present, a significant amount of infrastructure maintenance to the existing built racecourse environment is required, resulting in high costs to implement these measures. It is therefore necessary to invest in the enhancement of the existing built racecourse environment, which in turn shall benefit and support the premier racing programme and guest experience.
- 4.11 The main focus will be on preserving the racecourse's key assets alongside the delivery of up to date, high quality racing facilities.
- 4.12 In this context, the following enhancements and improvements are envisaged:
- Upgrading and rationalising the horse stables and delivering new stable staff accommodation/facilities;
 - Enhancements to the paddock;
 - Infrastructure improvements, including racetrack widening, access, and rationalised site-wide parking strategy;
 - Refurbishment improvements of the 45 year old Grandstand and Eclipse Stand;
 - A new on-site hotel, and
 - Introducing inviting frontages to racecourse entrance and car parks to create a more attractive route between Esher Town Centre, the racecourse and railway station.

DELIVERY OF THE VISION

- 4.13 In order to support and deliver this vision, JCR propose the delivery of a small proportion of well-designed, high quality residential development on existing, discreet surplus land assets at Sandown Park Racecourse. This in turn will make a contribution towards meeting local housing need within Esher (albeit this needs to be balanced with the site's Green Belt location). These residential sites will facilitate capital to be raised and reinvested into the business to secure a competitive and sustainable future for Sandown Park Racecourse.

SUMMARY

- 4.14 In this context, in terms of the rationale behind the development, the following themes are clear:
- JCR are the largest racecourse group in the country, and are seeking to invest in, and improve, their facilities nationwide.
 - The racecourse is an essential outdoor sports, leisure and community facility and generates substantial, and across-the-board, planning benefits for Esher, Elmbridge and further afield. It should, therefore, be supported by the planning system.
 - The current facilities are out of date, deteriorating and less than fully utilised, in need of substantial renovation and modernisation to be fully fit for purpose, and major capitally intensive works are required in order to secure the site's future. To ensure that these works are successful, the following principles must be adhered to:
 - Any improvements must be very high quality as a bare minimum, and should aim for excellence as standard.
 - Any major capital improvements must pay for themselves.
 - JCR have a vision for the site that will enhance the site's offer and deliver a wider and enhanced community provision. The consequence of not carrying out the works, or not carrying them out properly would be substantial harm for JCR, the Borough and more broadly, and be contrary to the principles of the planning system (discussed later in this document, and in the Green Belt Statement attached to this application).

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- This investment needs to be facilitated by a limited amount of residential development (including an element of affordable housing).
 - As confirmed in the Green Belt Statement attached to this application, all reasonable alternative approaches to development have been considered, but have been found lacking. There is therefore no reasonable alternative to the development sought by this planning application.

5 SITE AND SURROUDINGS

- 5.1 Sandown Park Racecourse extends up to circa 66 hectares in total, of which 17.68 hectares comprise the application sites which are located in Esher, Surrey, immediately to the north of Esher Town Centre and to the west of Esher Railway Station.
- 5.2 The whole of Sandown Park Racecourse is located within the Green Belt and is bounded by Portsmouth Road (south east), More Lane (west), Lower Green Road (north) and Station Road (east). The racecourse's main access is via Portsmouth Road (the A307) which is a primary route through Esher connecting to London, Surrey and further afield. The site is therefore in a sustainable location as a sporting venue and visitor attraction.
- 5.3 The operational facilities including the stables and paddock area, stable staff accommodation, and car parking are located on the southern part of Sandown Park Racecourse, with the Grandstand and Eclipse building overlooking the racetracks to the north.
- 5.4 Sandown Park Racecourse also contains established conference and banqueting facilities for holding conferences, events and public exhibitions. In addition to the racecourse and its associated buildings and facilities, there is also a dry ski slope/gym/fitness centre/skywalk adventure at The Warren (south west of the racecourse), a karting circuit, golf centre including driving range (in the centre of the racecourse), a children's nursery (on Portsmouth Road), and staff housing (in the north west of the racecourse).
- 5.5 The surrounding areas are suburban residential neighbourhoods with the high street of Esher Town Centre offering a wide range of shops and facilities.
- 5.6 There are a number of bus services along Lower Green Road, More Lane and Portsmouth Road that travel to and from the site, specifically to Weybridge, Brooklands, Addlestone, Kingston Upon Thames, Staines, Guildford, Downside and Walton-on-Thames. Esher Train Station (east of the site) travels towards London Waterloo, Clapham Junction, Surbiton, Walton-on-Thames, Weybridge and Woking.
- 5.7 More specifically, the individual proposal sites are described as follows:

THE ENHANCEMENT SITES

Site A

- 5.8 The 2.2 hectare 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.
- 5.9 It also contains Sandown Park Lodge, a two storey brick building providing a canteen and hostel accommodation (21 bedrooms) for stable staff during race meetings. Main vehicular access is from Portsmouth Road (A307) in the eastern corner.
- 5.10 Site levels rise from Portsmouth Road up towards The Warren with steep banking to the north of the main stable areas.
- 5.11 The site is within flood zone 1.

Site B

- 5.12 The 0.3 hectare site is located to the east of the existing Grandstand, on a predominantly hard standing area overlooking the racecourse. The site is vacant of buildings and is largely used for overflow car parking.

5.13 The site adjoins the existing car park with access available from within Sandown Park via the main entrance car parking area. The site slopes up to the Grandstand.

5.14 The site falls within flood zone 1.

Site C

5.15 The 3.3 hectare 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, with the racetrack passing closely along the north and south boundaries of the site (along the latter is an internal service road). Further to the south is the Grandstand.

5.16 Access to the site runs along the southern boundary of Site D via a tarmac road, leading to More Lane to the west. The site levels fall from the southwestern corner of the site to the north eastern corner.

5.17 The site falls within flood zone 1.

Site D

5.18 The 3.5 hectare 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 overflow car parking during race meetings. There are no significant buildings or trees within the site.

5.19 There is an internal access road to the site from More Lane. The racecourse passes closely along the north, south and west boundaries of the site. Further to the north is the golf course and to the south is the Grandstand. The site levels fall from the southwestern corner of the site to the north eastern corner.

5.20 The site falls within flood zone 1.

Sites E1 and E2

5.21 Site E1 is 0.46 hectares and is situated towards the southwestern edge of the racecourse and borders Site D. It falls within flood zone 1, and is currently used as part of the overflow car parking on high capacity race days.

5.22 Site E2 is 0.22 hectares and is located towards the northeastern edge of the racecourse, adjacent to the golf course, and falls within flood zone 2.

5.23 Both grassed sites are within immediate setting of the racecourse track.

Site F

5.24 Site F extends to 3.68 hectares and lies between the Grandstand, Portsmouth Road, Site B and Site 5. It is the main visitor car park for the racecourse on race and major event days. The southern part of Site F is formally laid out in rows but is not tarmacked. The northern part of Site F is also used for car parking, but is a grassed area with no markings.

5.25 In addition, Site F extends between the racecourse and Site B. This part of the site is currently used as a broadcasting compound on race days.

THE FACILITATOR SITES

Site 1

5.26 The 0.24 hectare site contains single storey stables (for existing overflow provision) on the southern boundary with access taken from More Lane in the south-west edge of Sandown Park. To the north is a wooded area known as 'The Warren' containing leisure/recreation

facilities and classified as ancient woodland with tree preservation orders in place. The gardens of properties on Esher Green and Tellisford back onto the site from the south.

5.27 Dual access is available from within Sandown Park through the stable area and from the eastern side of More Lane/Esher Green. The site rises up from the southern to the northern boundary.

5.28 Save from a small section of Site 1 being within Esher Conservation Area, the majority of the site lies outside but within the setting of the conservation area. A group of four listed buildings are located 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.

5.29 The site falls within flood zone 1.

Site 2

5.30 The 0.46 hectare site is existing parking area for Sandown Park Lodge (within Site A), 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.

5.31 Vehicle access is provided via the main entrance to Sandown Park off Portsmouth Road (A307), into the northeastern edge of the site.

5.32 The site's boundary along Portsmouth Road is defined by a tree line and timber fence. There is a Grade II listed Travellers Rest located adjacent to the southern boundary, with the Grade II Sandown House opposite.

5.33 The site rise steeply from Portsmouth Road (A307), with a shallow rise thereafter from Sandown Park Lodge.

5.34 The site is within flood zone 1.

Site 3

5.35 The 1.76 hectare 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 four single and two-storey detached houses providing racecourse staff accommodation. There are no heritage designations on this site.

5.36 Vehicle access is currently provided via a short driveway from the southern side of Lower Green Road, secured by a metal gate. Staff access is also available from within Sandown Park via narrow service road that runs along the edge of the racecourse. The site is fairly flat, with a small embankment up to the racecourse in the southwest corner.

5.37 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.

5.38 The site falls within flood zone 2.

Site 4

5.39 The 0.57 hectare site is a redundant area in the eastern corner of Sandown Park Racecourse, with no buildings. Immediately to the south is a two-storey Café Rouge restaurant (with customer parking provided to the rear and western side) off Station Road (B357), which also provides access into the south eastern corner of the site.

5.40 The site's perimeter has some vegetation and trees. It site is generally flat with no significant level differences across the site.

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- 5.41 To the west of the site are two to three storey office buildings, in addition to open car parking between buildings. The site is less than 250 m from Esher Railway Station.
 - 5.42 There are no heritage designations on the site however there is a listed and scheduled Monument, Milestone (White Lady) located 30 metres south.
 - 5.43 The majority of the site falls within flood zone 1, and partly within flood zone 2.

Site 5

- 5.44 The 0.99 hectare site is characterised by two halves. The western half is currently used as an informal overflow car parking on high capacity race days and a through route into the eastern half of the site. The eastern half accommodates a children's nursery (Use Class D1).
- 5.45 Access to the site is provided at its western edge from Portsmouth Road (A307) via the main entrance to Sandown Park. The southern boundary is heavily screened from Portsmouth Road (A307) by timber fence and trees.
- 5.46 Part of the children's nursery building is the locally listed Toll House that has been extended over the years with a further single storey building. 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.
- 5.47 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. The eastern edge of the site is bound by Cheltonion Place - a residential apartment building. There are also further residential dwellings opposite the site to the south.
- 5.48 The majority of the site is designated as an area of high archaeological importance.
- 5.49 The site is within flood zone 1.

SUMMARY

- 5.50 The majority of the proposed sites are on previously developed land or adjacent to existing development. All sites have good accessibility, being located in close proximity to Esher town centre and Esher railway station. As such, they are highly sustainable locations for the proposals.

6 PLANNING HISTORY

6.1 There have been a number of planning applications dating back to 1949 relating to the operations of the racecourse.

6.2 In respect of the proposed development, subject of this application, a Screening Opinion Request was submitted in December 2018 to EBC (LPA Ref: 2018/3728). In January 2019, EBC determined that the proposed development does not constitute EIA development.

6.3 Following a desktop review of EBC's online planning register, the relevant planning history for each of the individual proposal sites are summarised below.

SITE 1, SITE B, SITE E1 AND SITE E2

6.4 There are no planning application records available for Site 1, Site B and Sites E1 and E2.

SITE 2

6.5 In 1989, two planning permissions were granted for the demolition of existing buildings and erection of a two storey jockeys hostel/hospital building and extension to the existing weighing room to provide offices.

6.6 In 2008, a Screening Opinion issued by EBC confirmed that the hotel proposal was non-EIA development.

6.7 In 2009 and 2011, planning permission was granted in relation to the demolition of existing jockey accommodation and facilities, and erection of a hotel and associated infrastructure including parking, medical facilities, canteen, changing rooms and saddling enclosures. These permissions have since been implemented as confirmed by the Lawful Development Certificate granted in 2014.

SITE 3

6.8 Between 1952 and 1980, three planning permissions were granted relating to the erection of and alterations to detached cottages.

SITE 4

6.9 In 2002, planning permission was granted for the continued use as an overflow car park.

SITE 5 AND SITE F

6.10 Between 1973 and 2009, there were a number of planning permissions granted relating to Toll House and the building to the rear, which are both currently occupied by a children's nursery. These included a change of use from a staff house to a crèche/day care nursery, alterations and extensions.

6.11 In addition, between 1971 and 1982, a number of planning permissions were granted in relation to the existing cleared area of hard standing to the west of Toll House known as the 'Secondary Car Park, Sandown Park' (Site F). These included the use of this part of the site for a heavy goods vehicle training centre and associated office and portakabin accommodation.

SITE A

6.12 In 1961, planning permission was granted for the construction of a bus terminal on the west corner of Sandown Park.

6.13 Three planning permissions were granted in 1983, 1989 and 2003 respectively in relation to the portakabins, originally permitted to accommodate an office and jockeys changing room facilities.

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- 6.14 In 2000, as part of the wider racecourse upgrades, planning permission was granted for reserved matter details relating to alterations to the accesses and car parking which partially covered Site A.

SITE C

- 6.15 In 1994, temporary planning permission was first granted for the use of hardstanding as a silenced karting circuit, following permission for continued permanent use in the same year.
- 6.16 In 1996, planning permission was granted for demolition of the existing buildings and construction of a karting circuit and a detached two storey building to accommodate inter alia, a children's play area (it is understood that the latter was not subsequently built out). Most recently, in 2003, planning permission was granted for two single storey modular buildings on land adjoining the karting circuit.

SITE D

- 6.17 In 1971, planning permission was granted for the use of land for a car park with provision of 3200 watt lamp standards.

SUMMARY

- 6.18 Overall, the above planning history demonstrates that there have continually been a range of operational changes across Sandown Park Racecourse in order to upgrade and enhance the existing infrastructure and facilities. This demonstrates continued support for Sandown Park Racecourse in Elmbridge.
- 6.19 For further details, please refer to the planning history tables attached at **Appendix 2**.

7 THE PROPOSALS

7.1 This hybrid planning application comprises the following proposed developments:

OUTLINE ELEMENT

7.2 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 that are to be removed, with replacement facilities built to latest British Horseracing Authority Standards. Two-storey race day staff hostel accommodation (20no.bedrooms) and associated facilities will also be re-provided.
- **Site B (Hotel)** - the erection of a six -storey circa 150 bedroom hotel (Use Class C1) close to the eastern end of the Grandstand.
- **Site C (Family/Community Zone)** - demolition of existing buildings and remodelling of the existing kart track to accommodate a new year round family/community zone which shall comprise outdoor recreational areas and cycle track and indoor soft play and ancillary café buildings.
- **Site D (Rationalisation of Car Park)** - improvement of the car parking area through the establishment of grasscrete surface or similar to assist vehicular access that is to be retained off and provided via More Lane.
- **Site F (Remodelling of Car Park)** - improvements to the existing car parking and amendments to layout through soft and hard landscaping, including relocation of the existing broadcasting compound and turnstiles/kiosk to elsewhere within Site F, and installation of a new ring main unit.
- **Site 1 (Residential Mews)** - demolition of the existing stables and erection of flatted mews development of circa 15 no. residential units (Use Class C3) comprising a mix of 5 no. 1 bedroom units and 10 no. 2 bedroom units. In addition, associated access off More Lane, car/cycle parking, landscaping and bin stores shall be provided. Building heights ranges between 1, 2 and 3 storeys.
- **Site 2 (Residential Urban Frontage)** - demolition of the existing buildings to be replaced by new flatted development of circa 49 no. residential units (Use Class C3) fronting Esher High Street comprising 4 no. 1 bedroom units, 26 no. 2 bedroom units and 19 no. 3 bedroom units. In addition, associated access, car/cycle parking, landscaping and bin stores shall be provided. Building heights will range between 2, 3 and 4 storeys. The car parking area will be undercroft and covered by a landscaped deck.
- **Site 3 (Residential Villas)** - demolition of existing buildings to be replaced by 9 no. new residential villa development of circa 114 no. residential units (Use Class C3) fronting the racecourse, comprising 27 no. 1 bedroom units and 87 no. 2 bedroom units. In addition, associated the new access off Lower Green Road, emergency access to racecourse, car/cycle parking, landscaping and bin stores shall be provided. Building heights will range between 1 to 3 storeys.
- **Site 4 (Residential Crescent)** - development of circa 72 no. new residential units (Use Class C3), comprising 2 no. studios, 39 no. 2 bedroom units and 31 no. 3 bedroom units within a crescent form. In addition, associated access off Station Road, ramp access to

new basement car/cycle parking, landscaping and bin stores shall be provided. Building heights will be stepped to 4, 5 and 6 storeys, providing rooftop terraces and views out onto the racecourse.

- **Site 5 (Residential Villas and Day Nursery/Community Use)** - existing children's nursery buildings (aside from the original Toll House) to be demolished, with an upgraded, 2-storey children's nursery (Use Class D1) and associated amenity space, car parking relocated to the western part of the site. Access to the nursery shall remain as existing, via the main entrance to Sandown Park. The original Toll House shall be renovated and utilised as part of the proposed residential development. The remaining part of the site, to the east, shall accommodate development of circa 68 no. new residential units (Use Class C3), comprising 36 no. 1 bedroom units, 24 no. 2 bedroom units and 8 no. 3 bedroom units. In addition, associated access via Portsmouth Road, car/cycle parking, landscaping and bin stores shall be provided. Residential building heights will be stepped and range between 3 and 4 storeys.

7.3 For further details relating to the proposals, please refer to the parameter plans, indicative layout and zoning plans. Indicative layouts are submitted for illustrative purposes. These are also contained in the Design and Access Statement and Landscape Strategy.

FULL ELEMENT

7.4 The full element of the application relates to the following:

- **Racetrack widening at Site E1 and Site E2** within the south western and north eastern edges of the racecourse. The proposals primarily involved a minor ground levelling (southwest works only) with and repositioning of the white fence.
- **Bellmouth accesses** serving the new development sites.

7.5 For further details, please refer to the accompanying technical track widening and access drawings and Design and Access Statement.

8 PLANNING POLICY AND GUIDANCE

NATIONAL PLANNING POLICY

8.1 Relevant Central Government Policy is contained within the National Planning Policy Framework (the “NPPF”), adopted in February 2019 and its accompanying National Planning Practice Guidance (“NPPG”), adopted/launched online in 2014.

8.2 The NPPF sets out the Government’s planning policies for England and is underpinned by the presumption in favour of sustainable development applied by plan making and decision making.

Achieving sustainable development

8.3 Paragraph 8 identifies sustainable development as having three overarching objectives - economic, social and environmental which are interdependent and need to be pursued in mutually supportive ways.

8.4 Paragraph 11(c) advises that Local Planning Authorities (LPAs) should seek to approve development proposals which accord with the Development Plan without delay, or, as set out in paragraph (d), grant planning permission for proposals where there are no Development Plan policies, or the policies which are the most important for determining the application are out-of-date, unless:

- Paragraph 11d(i) - the application of policies within this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- Paragraph 11d (ii) - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

Decision-making

8.5 Paragraphs 39-46 explain that early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. The right information is crucial to good decision-making, particularly where formal assessments are required.

8.6 Specifically, paragraph 41 explains that for their role in the planning system to be effective and positive, statutory planning consultees will need to take the same early, pro-active approach, and provide advice in a timely manner throughout the development process.

8.7 Paragraph 44 also sets out that LPAs should only request supporting information that is relevant, necessary and material to the application in question.

The Green Belt

8.8 Paragraph 133 confirms that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open with the essential characteristics of Green Belts being their openness and permanence.

8.9 Paragraph 134 explains that the Green Belt serves five purposes:

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.

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- 8.10 Paragraph 143 explains that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.
- 8.11 Paragraph 144 explains that when considering any planning application, LPAs should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
- 8.12 Paragraph 145 sets out exceptions to ‘inappropriate development’ in the Green Belt including, inter alia:
- the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport and recreation, provided the facilities preserve the openness of the Green Belt; and
 - the limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use which would not have a greater impact on the openness of the Green Belt than the existing development, or not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an unidentified affordable housing need within the area of the LPA.
- 8.13 Paragraph 146 further states that certain other forms of development such as material changes in the use land for recreation, are also not inappropriate in the Green Belt provided they preserve its openness and not conflict with the purposes of including land within it.

Delivering a sufficient supply of homes

- 8.14 Paragraph 59 explains that to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.
- 8.15 Paragraph 61 explains that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing and families with children, which reflect local demand.
- 8.16 Paragraph 64 outlines that where major development involving the provision of housing is proposed, planning decisions should expect at least 10% of the homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups.
- 8.17 Paragraph 73 explains LPAs should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old with an appropriate buffer applied.

Building a strong, competitive economy

- 8.18 Paragraph 80 explains that planning decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

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- 8.19 Paragraph 82 also sets out that planning decisions should recognise and address the specific locational requirements of different sectors, including making provision for storage and distribution operations at a variety of scales and in suitably accessible locations.

Promoting healthy and safe communities

- 8.20 Paragraph 91 explains that planning decisions should to achieve healthy, inclusive and safe places, which promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other; are safe and accessible; and enable and support healthy lifestyles.

- 8.21 Paragraph 92 sets out that to provide the social, recreational facilities and services the community needs, planning decisions should inter alia, plan positively for the provision and use of shared spaces, community facilities - including meeting places, sports venues and open space) and ensure that established facilities and services are able to develop and modernised and are retained for the benefit of the community.

Promoting sustainable transport

- 8.22 Paragraph 102 explains that transport issues should be considered from the earliest stages of development proposals so that inter alia, the potential impacts of development on transport networks can be addressed, opportunities for promoting walking, cycling and public transport can be pursued in parallel with mitigating any adverse effects on the environment, and contributing to making high quality places.

- 8.23 According to paragraph 105, local residential and non-residential parking standards should take into account:

- a) The accessibility of development;
- b) The type, mix and use of development;
- c) The availability of and opportunities for public transport;
- d) Local car ownerships levels; and
- e) The need to ensure adequate provision of space for charging/plug in and other ultra-low emission vehicles.

- 8.24 Paragraph 106 advises that maximum parking standards should only be set where there is a clear and compelling justification that they are necessary for managing the local road network or optimising density of development in locations well served by public transport.

- 8.25 Paragraph 109 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or if the residual cumulative impacts on the road network would be severe.

Making effective use of land

- 8.26 Paragraph 117 explains that planning decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions with LPAs encouraged to direct their objectively assessed needs towards previously developed land as much as possible.

- 8.27 Paragraph 118 explains that planning decisions should give substantial weight to the value of using suitable, underutilised brownfield land within settlements for homes and other identified needs.

Achieving appropriate densities

- 8.28 Paragraph 122 explains that planning decisions should support development that make efficient use of land, taking into account:

- The identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
- Local market conditions and viability;
- The desirability of maintaining an area's prevailing character and setting; and
- The importance of securing well-designed, attractive and healthy places.

8.29 Paragraph 123 states that it is especially important that planning decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site.

Achieving well-designed places

8.30 Paragraph 124 explains that good design is a key aspect of sustainable development, with effective engagement between applicants, communities and LPAs encouraged.

8.31 Paragraph 127 sets out a number of design criteria applicable to new developments covering matters such as function, visual attractiveness, local character (whilst not preventing or discouraging appropriate innovation or change, including increased densities), a sense of place, accessibility and security.

8.32 Paragraph 128 explains that applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.

8.33 Paragraph 131 explains that in determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

Climate change and flooding

8.34 According to paragraph 153, subject to feasibility and viability, new development will be expected to comply with relevant local requirements, taking into account the need to minimise energy consumption.

8.35 Paragraph 162 sets out that when determining planning applications, LPAs should ensure that flood risk is not increased elsewhere, and where appropriate, application should be supported by a flood risk assessment.

Conserving and enhancing the natural environment

8.36 Paragraph 170 confirms that planning decisions should contribute to and enhance the natural and local environment by inter alia, minimising impacts on and providing net gains for biodiversity and prevent development from contributing to, being put at unacceptable risk from, or being adversely affected by soil, air, water or noise pollution.

Conserving and enhancing the historic environment

8.37 Paragraph 189 explains that in determining applications, LPAs should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

8.38 Paragraph 192 explains that in determining applications, LPAs should take account of:

- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

- The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality, and
- The desirability of new development making a positive contribution to local character and distinctiveness.

8.39 Paragraph 193 confirms that when considering the impact of development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. Furthermore, paragraph 197 advises that in weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

LOCAL PLANNING POLICY AND GUIDANCE

8.40 The proposal sites lie within EBC with the statutory development plan consisting of the:

- Core Strategy (2011);
- Policies Map (2011), and
- Development Management Plan (2015).

8.41 The Core Strategy sets out the vision, spatial strategy and core policies that are used to shape future development in the Borough up to 2026, with the Development Management Plan containing more detailed policies that all planning applications will be assessed against.

8.42 According to the Policies Map (2011), all the proposals fall within designated Green Belt and the defined Esher Suburban Settlement Area boundary. In addition, the following site-specific designations are noted:

- Site 1 - A small proportion of western part of site (where access is proposed) falls within the Esher Conservation Area.
- Site 2 - No specific designations. Adjacent to the Grade II listed Travellers Rest and Sandown House.
- Site 3 - Flood zone 2.
- Site 4 - Flood zone 2 (proposed residential development), flood zone 1 (proposed car parking).
- Site 5 - Contains locally listed Toll House. Adjacent to southern boundary is the Grade II listed coat tax post and Grade II listed gates and railings to Sandown Racecourse to the southwest.
- Sites A, B, C, D - no specific designations.
- Sites E1, E2 and F - no specific designations.

8.43 The Core Strategy recognises Sandown Park Racecourse as one of the Borough's main visitor attractions and assets, and a major employer. It identifies that Sandown Park helps to support the town centre's economy and that a comprehensive approach to parking and traffic issues will bring benefits to the town centre and to visitors to the Racecourse. Development for Sandown Park is supported in a way that brings economic and environmental benefits whilst protecting the amenities for local residents. Notably, it recognises that additional visitor accommodation will support the major tourist attractions within and adjoining the Borough, and supports sustainable growth of tourism, ensuring that it remains a strong element of the Borough's economy.

8.44 The most relevant policies for the proposals contained within the Core Strategy (2011) and Development Management Plan (2015) are summarised below:

The Green Belt

- 8.45 Policy DM17 (Green Belt - Development of new buildings) states that in order to uphold the fundamental aims of the Green Belt to prevent urban sprawl and maintain openness, inappropriate development will not be approved unless the applicant can demonstrate very special circumstances that clearly outweigh the harm. Recreational development should be sited to minimise any impact on openness and should include a high quality landscape scheme. In addition, proposals for the limited infilling or the partial or complete redevelopment of previously developed sites will be considered in light of the size, height, type, layout and impact of existing buildings, structures and hard standing, together with the degree of dispersal throughout the site of existing and proposed development.
- 8.46 Policy DM19 (Horse-related uses and development) states that new development associated with appropriate horse-related activities will be permitted, including within the Green Belt provided it complies with policy, if it would respect the character and amenity of the area without resulting in undue pressure on local infrastructure, nature conservation and biodiversity. Key considerations include the standard of design, landscape scheme and access and management arrangements.

Residential Uses

- 8.47 Policy CS2 (Housing Provision, Location and Distribution) states that the Council will encourage appropriate housing development on previously developed land and ensure the effective use of urban land for housing by delivering high-density housing developments in the most sustainable locations.
- 8.48 Policy CS9 (Esher) states that additional residential development will be provided across the area, primarily through redevelopment of previously developed land, taking account of relative flood risk. All new development will be expected to enhance local character. Specific attention will need to be given to areas of high heritage value, including Esher Conservation Area. The Council will also promote the provision of hotel accommodation in order to support tourist venues, including at Sandown Park Racecourse.
- 8.49 Policy CS19 (Housing Type and Size) states that the Council will seek to secure to a range of housing types and sizes on developments across the Borough and resist an over concentration of any one type of dwelling if this is considered to have the potential to adversely affect community cohesion. Appropriate provision should be made for new housing to wheelchair accessible or easily adaptable for residents.
- 8.50 Policy CS21 (Affordable Housing) states that the Council will require provision of affordable housing of 40% of the gross number of dwellings on sites of 15 dwellings or more; 30% on sites of 6-14 dwellings and 20% on sites of 5 dwellings. Where exceptionally development is proposed on a greenfield site (excluding residential garden land), at least 50% of the gross number of dwellings should be affordable on any site of 15 dwellings or more.
- 8.51 Policy CS24 (Hotels and Tourism) states that the Council will promote all new hotel development on previously developed land within or adjacent to district centres; and require new hotels to be accessible by public transport.
- 8.52 Policy DM4 (Comprehensive Development) states that in assessing proposals for separate sites in the same ownership that involve sharing and/or transferring uses between the sites, the Council will give careful consideration to balancing the benefits of such development to the Borough as a whole with the aims of sustainability and achieving mixed communities whilst making efficient use of land.
- 8.53 Policy DM10 (Housing) states that minimum space standards will be applied to all new housing development, unless they are superseded by nationally applicable standards.

Ancillary accommodation, including staff accommodation, should be subservient to the main dwelling.

Non-Residential Uses

- 8.54 Policies CS16 (Social and Community Infrastructure) and DM9 (Social and Community Facilities) states that to ensure the provision of accessible and sustainable social and community infrastructure, the Council will promote the mixed use of social and community infrastructure.
- 8.55 Policy DM20 (Open Space and Views) outlines that non-designated areas of existing open space, sports and recreational buildings and land, should not be built on unless evidence demonstrates a surplus to requirements, the loss would be replaced by equivalent or better provision, or the development is for alternative sports and recreation provision, the needs of which clearly outweigh the loss.

Design

- 8.56 Policy CS17 (Local Character, Density and Design) states that new development will be required to deliver high quality and inclusive sustainable design, which maximises the efficient use of urban land whilst responding to the positive features of individual locations, integrating sensitively with the locally distinctive townscape, landscape, and heritage assets, and protecting the amenities of those within the area.
- 8.57 Policies DM2 (Design and Amenity), DM3 (Mixed Uses) and DM10 (Housing) state that all development proposals should preserve or enhance the character of the area, taking account of design guidance detailed in the Design and Character SPD. Development proposals should be designed to offer an appropriate outlook and provide adequate daylight, sunlight, privacy, ventilation and prevent nuisance from commercial to residential uses.

Townscape, Heritage and Archaeology

- 8.58 Policy CS17 (Local Character, Density and Design) states that new development should respond to the positive features of individual locations, integrating sensitively with the locally distinctive townscape, landscape, and heritage assets, and protecting the amenities of those within the area.
- 8.59 Policy DM12 (Heritage) states that planning permission will be granted for developments that protect, conserve and enhance the Borough's historic environment. Development to, or within the curtilage of, a listed building or structure should preserve or enhance its special interest and setting. Any new development should be sensitive to the physical survival, setting or overall heritage significance of Scheduled Monuments, and positively act to enhance the monument in question and development within or affecting the setting of the Conservation Area, including views in or out, should preserve or enhance the character and appearance of the area.

Trees, Landscaping and Ecology

- 8.60 Policy CS14 (Green Infrastructure) states that the Council seeks to safeguard important trees, woodlands and hedgerows and securing provision of soft landscaping measures in new development, focusing on the use of native species, particularly trees, which are an important feature of the Elmbridge landscape.
- 8.61 Policy CS15 (Biodiversity) states that the Council will seek to ensure new development protects and improves all biologically important sites, maximises the contribution of other green spaces and features where appropriate, protects all woodland, including ancient woodland from damaging development and land uses, is directed to previously developed

land, taking into account of its existing biodiversity value, and ensure no net loss of biodiversity, and where feasible contribute to a net gain

- 8.62 Policy DM6 (Landscape and Trees) states that development proposals should be designed to include an integral scheme of landscape, tree retention, protection and/or planting that reflects, conserves or enhances the existing landscape and integrates the development into its surroundings. In considering works to protected trees within conservation areas, the Council will assess the amenity value of the tree or woodland and the likely impact of the proposal on the amenity of the area.
- 8.63 Policy DM21 (Nature Conservation and Biodiversity) states that all new development will be expected to preserve, manage and where possible enhance existing habitats, protected species and biodiversity features.

Transport

- 8.64 Policy CS25 (Travel and Accessibility) states that the Council will direct new development that generates a high number of trips to previously developed land in sustainable locations within the urban area. Maximum parking standards will be applied to all uses. Transport assessments and travel plans for all major development proposals are required to promote the delivery and use of sustainable transport.
- 8.65 Policy DM7 (Access and Parking) states that general access and parking considerations include:
- The layout and siting of accesses should be acceptable in terms of amenity, capacity, safety, pollution, noise and visual impact;
 - Access to and from the highway should be safe and convenient for pedestrians, cyclists and motorists;
 - Provisions for loading, unloading and the turning of service vehicles are expected to be designed into the scheme ensuring highway and pedestrian safety; and
 - The proposal should minimise the impact of vehicle and traffic nuisance, particularly in residential areas and other sensitive areas. The proposed parking provision should be appropriate to the development and not result in on-street parking that would be detrimental to local residential amenity with garaging, cycle stores and car parking designs to be integrated into the scheme, taking into account the character of the area.

Energy and Sustainability

- 8.66 Policy CS27 (Sustainable Buildings) states that an Energy Assessment should be submitted with planning applications to demonstrate how reductions of the carbon foot print in new development.

Flood Risk and Drainage

- 8.67 Policies CS26 (Flooding) and DM5 (Pollution) states that in the event that development takes place in flood zones 2 or 3, the Council will require flood resistance and resilience measures in line with current Environment Agency advice, and advice included within the Elmbridge SFRA. New developments will need to contain SuDs (where practical) and all development within flood zones 2 and 3 will require surface water runoff to be controlled, as near to its source as possible, and at greenfield rates.

Pollution

- 8.68 Policy DM5 (Pollution) sets out that appropriate attenuation measures to mitigate any affects of noise, air, odour, light, soil pollution will be expected and sought where appropriate, via planning condition.

EVIDENCE BASE

Objectively Assessed Housing Needs

- 8.69 The latest Strategic Housing Market Assessment for Kingston upon Thames and North East Surrey Authorities (SHMA) (2016) identifies that the objectively assessed need (OAN) for Elmbridge Borough is 9,486 dwellings (474 per annum).
- 8.70 EBC's Land Availability Assessment (2016) identified that sites within the existing urban area of Elmbridge suitable for housing and which are considered deliverable and development have the potential capacity of delivering approximately 3,793 new homes. This confirms that EBC is not able to identify sufficient land to meet its housing need with a potential residual housing need of 5,687 units.
- 8.71 EBC is not been able demonstrate a five year housing land supply as recognised its latest Annual Monitoring Report (February 2018) (paragraph 4.37), which states the current supply is 3.25 years or a deficit of 35%.

SUPPLEMENTARY PLANNING DOCUMENTS

- 8.72 The Council has published a number of Supplementary Planning Documents that guides development in accordance with the development plan. The supplementary documents of particular relevance to the proposals include:
- Design and Character SPD (2012);
 - Companion Guide: Esher (2012);
 - Developer Contributions SPD (2012); and
 - Flood Risk SPD (2012).
- 8.73 The Design and Character SPD (2012) sets out the character summary of Esher the design guidance in accordance with the character of the area. The document also provides design guidance for specific development types including commercial development and affordable housing. With the proposals being made in outline, specific design guidelines cannot be considered until reserved matters stage.
- 8.74 The Companion Guide: Esher (2012) sets out a detailed character assessment of Esher and works alongside the Design and Character SPD. Sandown Park is considered an important feature to Esher, particularly as a visitor attraction and its provision of long views towards London.
- 8.75 The Development Contribution SPD (2012) sets out guidance on Community Infrastructure Levy and general planning obligations, including affordable housing contributions.
- 8.76 The Flood Risk SPD (2012) sets out guidance on how to assess sites that have the potential to flooding.

COMMUNITY INFRASTRUCTURE LEVY (CIL)

- 8.77 The Council's CIL Charging Schedule came into force on 1st October 2013.
- 8.78 Accordingly, the following charging rates are applicable to the proposals:
- Residential dwellings (Use Class C3) = £125 per sqm plus indexing.
 - All other development = £0
- 8.79 In accordance with the CIL Regulation 123 list, transport infrastructure contributions, specifically public transport infrastructure improvements will be negotiated where transport related S106 contributions are not sought.

EMERGING PLANNING POLICY

8.80 The Council is currently preparing a new Local Plan, which will supersede the Core Strategy (2011). A Strategic Options Consultation took place December 2016 - February 2017. Therefore, the emerging Local Plan at its current state stands holds very little weight in determining planning applications. That said, evidence base, prepared for the emerging Local Plan relative to the OAN is relevant to the determination of the housing proposals at the site.

SUMMARY

8.81 In summary, the following policy themes are highlights:

- Within the Green Belt, exceptions to inappropriate development include the provision of appropriate facilities for outdoor sport and recreation which would preserve the openness of the Green Belt, replacement of a building provided that it does not result in disproportionate additions over and above the size of the original building and limited infilling or partial or complete redevelopment of PDL, which would not have a greater impact on the openness of the Green Belt than the existing development or not cause substantial harm to the openness of the Green Belt, where the development would re-use PDL and contribute to meeting an identified housing need. , In other instances where ‘very special circumstances’ exist that outweigh any harm by reason of inappropriateness or any other harm resulting from the proposal.
- Policies support the upgrade and enhancement of existing sport, recreational and community facilities, including Sandown Park, which is recognised as one the Borough’s main visitor attractions and assists and a major employer.
- The latest evidence base confirms that there is a high need to provide new homes within Elmbridge.
- Policy supports sustainable development that in particular prioritises recycling urban land within settlements that is near to services and public transport links.

9 PRE-APPLICATION ENGAGEMENT

- 9.1 The NPPF (2019) outlines the need for effective engagement consultation as part of the development process and confirms the importance of early engagement with the local authority in association with the preparation of planning applications.
- 9.2 Against this background, the application has sought to secure involvement, advice and agreement with Officers from the earliest stage as part of the detailed pre-application process. This ‘front loading’ approach has been pursued in the interest of promoting a collaborative approach as part of the evolution of the proposals.
- 9.3 Extensive pre-application consultation has been undertaken to date with the following groups:
- Elmbridge Borough Council (officers and councillors);
 - Surrey County Council (councillors, highways, archaeology, drainage, LLFA);
 - Other statutory/non-statutory Consultees (e.g. Natural England, Surrey Wildlife Trust, Sports England), and
 - Public Engagement (local residents, associations, businesses).
- 9.4 A record of pre-application engagement with the various parties identified above is set out in further detail in the accompanying Statement of Community Involvement.

10 PLANNING CONSIDERATIONS

10.1 This section sets out the key planning considerations relevant to the determination of the application, informed by the contextual analysis of the sites' surroundings, planning history and policy review.

10.2 The key planning considerations can be summarised as follows:

- Green Belt Considerations;
- Community Facilities;
- Housing Type, Mix and Affordable Housing;
- Design Quality and Accessibility;
- Transport and Highways;
- Heritage and Archaeology;
- Landscape and Townscape;
- Ecology;
- Arboriculture;
- Air Quality;
- Flood Risk and Drainage;
- Ground Conditions;
- Noise;
- Lighting;
- Site Waste Management;
- Sustainability and Energy;
- Utilities;
- Phased Delivery, and
- Planning Obligations/ Community Infrastructure Levy.

10.3 These considerations are addressed in turn below.

GREEN BELT CONSIDERATIONS

10.4 Planning considerations, relative to issues arising from the site's location within the green belt, are set out in the accompanying Green Belt Statement by Rapleys (which itself is supported by a Green Belt Review prepared by EDP).

10.5 However, in essence:

- The proposal as a whole can be considered as appropriate development within the Green Belt as it falls into the types of development described in paragraph 145 of the NPPF, and
- Even if the proposal was not appropriate development, the positive substantial planning benefits of the proposal would, collectively, be very special circumstances that clearly outweigh any harm by reason of inappropriateness and any other harm resulting from the proposal.

10.6 In this context, the proposal as a whole is acceptable in terms of Green Belt planning policy.

COMMUNITY FACILITIES

10.7 The proposals seek to enhance the visitor experience and the provision of year round, community leisure/recreational facilities, which is one of JCR's key objectives for the future of Sandown Park.

10.8 In particular, the following appropriate facilities for the site's Green Belt location is proposed:

- A new family/community zone within Site C to complement the racecourse, which shall include the demolition of existing buildings and remodelling of the kart track to create a cycle track, outdoor younger children play area, older children play area, open park space, viewing area and ancillary a cafes. On non-race days, it will be available to the community all year round and a large part of it will be offered to the community free of charge. This significantly enhances the community provision available in Esher and the surrounding areas.
- An upgraded, modern children's nursery and associated amenity space for community benefit is located within Site 5.

10.9 Overall, in addition to the existing gym centre, dry ski slope, adventure tree walk and golf course shall continue to operate within the grounds of Sandown Park, the proposals shall enable and support healthy lifestyles and inclusiveness to benefit the community.

10.10 In addition, JCR are also exploring opportunities for establishing exclusive benefits to local residents including a Community Race Day initiative and other discounts on tickets for other fixtures.

10.11 **The proposed development therefore accords with paragraphs 91, 92, and 145 of the NPPF, and local policy CS16.**

HOUSING TYPE, MIX AND AFFORDABLE HOUSING

10.12 The adopted EBC Core Strategy Policy C19 seeks to secure a range of housing types and sizes in order to create inclusive and sustainable communities reflecting the most up to date SHMA in terms of the size and type of residential units.

10.13 The adopted Development Management Policy DM10 also requires that housing development on sites of 0.3ha or more should promote house types and sizes that make most efficient use of land and meet the most up to date measure of local housing need whilst reflecting the character of the area.

10.14 The latest SHMA identifies that the majority of the additional requirement is for smaller (1-2 bedroom) units. It seeks the following mix of units to balance the supply of housing in Elmbridge Borough: 1bed units - 28%, 2bed units- 42% and 3bed units - 29%. The housing mix for the proposed sites has been informed by balancing the SHMA needs/target and local market demand, appropriately, so that the scheme will deliver a development much better suited to the Esher residential market place that becomes a destination of choice for both local and out of area buyers.

10.15 In this context, it is proposed that the proposals will deliver the following mix of units across the residential sites:

- Studio unit - 1%
- 1 bed unit - 23%
- 2 bed unit - 59%
- 3 bed unit - 18%

10.16 An accommodation schedule is enclosed with this application.

10.17 In order to deliver smaller units, it is proposed that the all residential sites are promoted on the basis of flatted development, which is in line with the latest SHMA identifying the need for smaller residential units and local market demand. This matter is set out in further detail in the Housing Mix Background Note at **Appendix 3**.

10.18 With regards to affordable housing, the proposals deliver 49no. affordable units at Site 2, comprising the following mix:

- 4no. 1 bed units
- 26no. 2 bed units
- 19no. 3 bed units

10.19 The above affordable housing provision will also include low cost housing designated for essential workers in connection with the operation of the Racecourse.

10.20 All dwellings shall comply with the minimum national space standards.

10.21 **In these terms, the proposal is acceptable in terms of housing mix, size and affordable provision.**

DESIGN QUALITY AND ACCESSIBILITY

10.22 Following a detailed site evaluation of the physical constraints, the Masterplan for Sandown Park is informed by the following identified opportunities:

- Delivery of development in sustainable locations on PDL or on land adjacent to existing development and close to existing services, facilities and public transport.
- Infill and rounding off of existing development clusters.
- Improving connectivity between the racecourse, Esher railway station and town centre.
- Utilising and upgrading existing accesses.

10.23 Furthermore, the proposals have taken into account the relevant legislation, building regulations and design guidance in order to provide development that is inclusive for all users, regardless of their disability, age, or gender. A detailed Access Statement is provided within the Design and Access Statement. However, in summary, the proposals will allow for the following identified accessibility initiatives to take place both within and outside of the application sites:

- Installation of tactile paving/dropped kerbs at crossing points;
- Pavement maintenance;
- Provision of clearly demarcated disabled car parking spaces;
- More safe and accessible disabled car parking spaces;
- Improved accessibility on approaches and at entrances, as well as within W/Cs;
- Accessible racing staff accommodation (given the current Sandown Lodge does not currently have any disabled facilities in bedrooms or lift access to upper floors).

10.24 In terms of the current Racecourse facilities, feedback from racing staff has highlighted the need to improve the quality of the day facilities (e.g. showing and changing facilities, areas for relaxing) as well as the stable yard loading ramp (i.e. in terms of its quality and capacity). The proposed racetrack widening at two important areas of the racetrack (Sites E1 and E2) is also necessary to allow JCR to put on an improved and safer racing product.

10.25 Although these above matters (aside from the racetrack widening) are reserved for future approval, JCR is committed to the achievement of good design in the development of the Site, to ensure that the proposals will enhance Sandown Park and maximises its benefits to Esher.

10.26 Further design and accessibility details are available within the Masterplan document and Design and Access Statements, prepared by PRC, which accompany this application.

10.27 **It has therefore been demonstrated that the proposals deliver a high quality, inclusive, and well designed scheme is achieved in line with the NPPF and local design policies CS17, DM2, DM3 and DM10.**

TRANSPORT AND HIGHWAYS

- 10.28 Following extensive consultation with the SCC Highways Officer, the application is supported by the accompanying Transport Assessment, prepared by TPP, in the technical appendix of the ES, which appraises the transport accessibility and car parking to assess the likely impacts of the proposed development on the road network.
- 10.29 Overall, the site is well-located for a range of sustainable transport modes that lead to various areas of Esher, Elmbridge and wider Surrey.
- 10.30 The proposed developments and accesses serving them are designed to ensure highway safety within and outside the site, taking into account Sandown Park's operational requirements.
- 10.31 The site-wide parking strategy has been reviewed to facilitate the proposed enhancements for Sandown Park, including the provision of additional facilities, to formalise and improve the existing parking arrangement.
- 10.32 An outline Environmental Construction Management Plan (CEMP) (accompanying the ES) has also been prepared by Blue Sky Building to ensure traffic management is carefully controlled during the construction phase. This includes a proposed routing strategy (avoiding local residential roads wherever possible) and limiting the hours of construction, for example. The increase in daily traffic during the construction period is predicted to be minor/negligible on the roads that surround the site and across the wider highway network.
- 10.33 Once all the development is complete, the assessment has shown that the traffic generated by the development will increase, but this is a permanent negligible effect on local traffic conditions, driver delay, driver stress, pedestrian delay, pedestrian amenity, cycle delay, cycle amenity, accidents and safety, severance, fear and intimidation.
- 10.34 Travel Plans for residential, hotel and racecourse event days will provide the management and operational framework to influence future travel behaviour and encourage the use of more sustainable modes of travel, thus reducing the overall need to travel by private car. Notably, however, these travel plans are themselves not necessary to reduce the traffic generated by the development from an environmental impact assessment point of view.
- 10.35 For further details, please refer to the Design and Access Statement, Transport Assessment, Draft Travel Plans and CEMP.
- 10.36 **In transport terms, the proposals therefore address the requirements of the NPPF and local policies CS25 and DM7.**

HERITAGE AND ARCHAEOLOGY

- 10.37 The proposals are informed by an Archaeological and Heritage Assessment (AHA), prepared by EDP which has considered the potential impact of development on the heritage assets and landmarks, and assets surrounding the site.
- 10.38 Given the largely suburban context, the proposals would not cause any harm to any designated heritage asset assessed, as a result of the proposed scheme.
- 10.39 Moreover, the scheme will contribute to enhancements to the Grade II listed Travellers Rest, through financial contributions, for its upkeep and improvements in its experience through improved boundary treatments. Further heritage-based enhancements are proposed in the form of interpretation boards, and enhanced boundary treatments in relation to the Grade II listed gates close to Site 5, along with additional traffic control measures.
- 10.40 Site 1 lies within the setting for the Esher Conservation Area. Site 1 does not make a positive contribution to the character and appearance of the conservation area, although

the higher ground of The Warren to the north presents a wooded backdrop to traditional buildings fronting Esher Green. Nonetheless, the scale of the proposal has been considered carefully so as to ensure that it does not dominate within the views of Esher Green. Accordingly, the character and appearance of the conservation area would be preserved.

- 10.41 The locally listed Toll House located within the south-eastern part of Site 5 is a non-designated heritage asset, which is considered to be of local value. The proposals shall retain the earlier core of the Toll House to incorporate into the residential development and shall remove the heavily altered, western addition. Therefore, the most important aspect of the Toll House is retained, thereby meeting the requirements of local planning policy.
- 10.42 An Area of Archaeological potential lies within part of Site 5. The AHA considers that a suitable scheme of further investigation can be secured by a condition to ensure that any remains, if present, are adequately identified and recorded in advance of development. There is considered to be a low potential for significant archaeological remains to be present within the remainder of the proposed sites.
- 10.43 **The AHA therefore demonstrates that that the proposal is acceptable in heritage terms and meets the requirements of national planning policy as well as local policies CS17, DM12 and DM20.**

LANDSCAPE AND TOWNSCAPE

- 10.44 A Landscape/Townscape and Visual Appraisal (LTVA) prepared by EDP provides an appraisal of the townscape and visual effects predicted to arise from development on each development site with reference to the baseline analysis of the townscape and visual characteristics identified to inform the development proposals, including recommendations for mitigation.
- 10.45 Following a review of national and local policy, landscape character and visual amenity being undertaken, the LTVA confirms that each site relates very well in both landscape/townscape and visual terms to the existing context, and that the proposals within each site represent a logical and easily assimilated development into this part of Esher.
- 10.46 A number of key landscape design principles have informed the Masterplan in order to guide the implementation of a suitable landscape scheme for the proposed development. These include, inter alia:
- New tree planting in key areas and appropriate introduction of species and quantities to assimilate the proposed built form and address each site's relationship with the local context.
 - Setting back the proposed development, for example along Station Road and Portsmouth Road to maintain green, well-treed characteristics and approach to Esher.
 - Enhancement of new open green spaces with new landscape features - as part of the family /community zone at Site C - in order to maintain the 'green' nature of the internal areas of the Racecourse.
 - Where possible, the retention and reinforcement of existing landscape features and boundaries - including at Site 3 where the 'green' setting of Lower Green Road and character of the perceived well-treed residential context to the north.
 - Introduction of structural landscaping, shrubs and native plant species of local provenance and characteristic of the local landscape character as part of the landscape strategy to enhance the landscape and ecological value of the green infrastructure of the proposed development.

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- 10.47 In addition, a number of ecological recommendations are made, with further detail to be secured at the reserved matters stage, through a Landscape and Ecological Management Plan. Recommendations include for instance, establishment of areas of species -rich wildflower grassland within areas of green infrastructure, incorporation of waterbodies to enhance the resource for amphibians and invertebrates, and habitat enhancements.
- 10.48 Illustrative Landscape Strategies for Sites 3 and 5 are provided within the accompanying LTVA.
- 10.49 Following the maturation of the landscaping mitigation proposals, there are no anticipated to be any material adverse effects upon:
- Landscape designations;
 - The underlying townscape character;
 - The wider landscape character;
 - Visual effects upon PRoW;
 - Roadside pedestrians or visitors to the Racecourse.
- 10.50 While there may be some indivisibility experienced by residents adjacent to the Racecourse, the existing nature of the townscape context and the use proposed would be considered to moderate any effect accordingly.
- 10.51 In conclusion, the LTVA confirms that the proposed development within the confines of Sandown Park Racecourse, overall, represents a small-scale and visually discrete feature which is entirely in keeping with the landscape and townscape character and would not therefore result in any material landscape or visual effects in line with policy.
- 10.52 **Accordingly, the proposed development accords with adopted national and local policies relative to landscape, townscape and local character/amenity and views.**

ECOLOGY

- 10.53 A Preliminary Ecological Appraisal and Preliminary Bat Roost Assessment has been undertaken by Tyler Grange to inform the proposals. In summary:
- None of the proposed sites are covered or are directly adjacent to any sites that are subject of statutory/non-statutory protection.
 - Following consultation with Natural England to confirm if recreational impacts are likely on the South-west London Waterbodies SPA and Ramsar (2.6 km from the nearest site boundary), it is concluded that no impacts are likely and as such no mitigation is required. This is detailed further in the Habitats Regulations Assessment (HRA) Screening Report that accompanies the application.
 - Appropriate mitigation in the form of providing adequate open space nearby to the development sites 1, 2,3,4,5 and B where there will be a net increase in the number of residents/temporary visitors would respond to potential recreational impacts on Littleworth Common SNCI.
 - The majority of habitats to be lost as a result of the proposed development are of negligible ecological importance and no specific mitigation is required. Impacts from the proposed developments are limited to roosting bats, great crested newt and reptiles. Further surveys and/or precautionary mitigation measures are required for these species.
 - Existing habitats will be retained and enhanced where possible and new habitat created on-site where possible in line with local planning policy and the Biodiversity and Planning in Surrey. To demonstrate a measureable net gain in biodiversity, indicative landscaping proposals have been prepared by EDP for Sites 3 and 5, with landscaping considerations for all remaining sites covered by the LTVA.

- Post-construction, a number of additional enhancements for specific species groups could be provided, including the introduction of bat and bird boxes, with any artificial lighting to be designed to limit the potential impacts on bats.
- Those valuable ecological resources that exist, or could exist, at the site, could be accommodated by the adoption of design principles. Where impacts may occur, these could be more than mitigated through better management of retained habitats (notably scattered trees, scrub and grassland) and habitat creation within the site.

10.54 **In ecological terms, the proposals therefore acceptable in principle, subject to suitable mitigation being implemented in line with local policies CS14, CS15, and DM21 of the Core Strategy and Development Management Plan.**

ARBORICULTURE

10.55 An Arboricultural Impact Assessment (AIA) has been prepared based on the Tree Survey undertaken by Tyler Grange. It identifies any potential arboricultural implications of the proposals and addresses the potential impacts of the development in relation to existing trees. It also recommends mitigation measures including those necessary during the construction phase.

10.56 In summary:

- The proposals demonstrate that the trees of high arboricultural value can be retained as part of the development, together with moderate value trees, wherever this has been possible.
- The principle of avoiding encroachment into or removal of trees within Ancient Woodland designations and trees subject to a TPO can be retained. Veteran trees will also be retained and unaffected by the development, subject to adoption of sensitive implementation of the proposed re-location of the pre-parade ring within Site A.
- Only moderate to low value grade trees are required to be removed, with compensatory measures proposed to replace and increase tree cover within the new development.
- The definitive impacts will be determined as part of the detailed design stage that will include full scheme details. Tree retention and removal may therefore be subject to change under further assessment.

10.57 **The AIA concludes that at this outline stage, the development proposals are therefore supportable in arboricultural terms and conform with local planning policies pertinent to trees including CS14 and DM6,**

AIR QUALITY

10.58 The proposals are informed by an Air Quality Assessment, undertaken by Redmore Environmental and appended to the accompanying ES. It has assessed the construction and operational air quality impacts of the proposed development.

10.59 In summary:

- During the construction phase, assuming good practice dust control measures and HGV measures (as set out in the CEMP) are carried out, the potential air quality effects from dust generated and road vehicle exhaust emissions associated with traffic generated by the proposals are predicted not to be significant.
- The use of Travel Plans to influence future behaviour and encourage more sustainable modes of travel are likely to further emphasise the negligible impact on air quality as a result of the traffic generated by the development.
- Results of the dispersion modelling at sensitive locations as result of emissions from the local highway network both with and without the development in place confirm that the

effects on annual mean NO₂ and PM₁₀ concentrations as result of the traffic generated by the development were classified as negligible at all receptor locations.

- Based on the worst case predicted impact, the overall significance of potential air quality effects was classified as negligible.

10.60 Overall, the proposed scheme does not result in unacceptable impacts regarding the air quality and therefore it accords with both national policy and local policy DM5.

FLOOD RISK AND DRAINAGE

10.61 An Assessment of Drainage and Flood Risk has been undertaken by Hafren Water on a site-by-site basis, which has been subject to pre-application consultation and agreement with the LLFA. It has informed the proposals as well as appropriate flood resistance and resilience mitigation measures, where necessary.

10.62 Site 3 is located within Flood Zone 2 (albeit, the EA has advised that, for the purposes of planning application, the area should be treated as Flood Zone 3a). The southern area of Site 4 (where car parking is proposed) is located in Flood Zone 2. As such, the relevant tests under the NPPF on flooding are being considered in the Flood Risk Assessment and the following section.

10.63 Paragraph 158 of the NPPF states that “*the aim of the sequential test is to steer new development to areas with the lowest risk of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.*” The application of the flood risk sequential test implements this policy.

10.64 If, following the application of the sequential test, it is not possible for development to be located in zones of lower probability of flooding, the Exception Test can be applied, if appropriate. As set out in paragraph 160 of the NPPF, for the Exception Test to be passed, it should be demonstrated that:

a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and

b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

10.65 In terms of applying the sequential test, it should be noted that both Sites 3 and 4 form part of a comprehensive masterplan-led approach to deliver residential development that in turn would facilitate the delivery of the proposed racecourse enhancements and community benefits at Sandown Park that falls entirely within the demise of the Applicant. The use of third party land to deliver housing development can therefore not be relied upon. Furthermore, Sandown Park is an operational racecourse and includes other outdoor recreational facilities and no residential sites can be located in areas, which would undermine the existing operations or residential amenity of new developments. On this basis, there are no available sites in areas with a lower risk of flooding to accommodate the proposed development at Sites 3 and 4.

10.66 The exception test must therefore be applied. In applying the exception test, the following points are highlighted to demonstrate the wider sustainability benefits to the community as a result of the proposed residential development at Sites 3 and 4, which outweigh the flood risk:

- Both Sites 3 and 4 form part of a wider group of proposed development parcels at Sandown Park Racecourse, which overwhelmingly is located within Flood Zone 1. Notably, the residential element of Site 4 is located in Flood Zone 1.
- As the entire racecourse falls within designated Green Belt, the majority of the development sites - including Sites 3 and 4, are directed to previously developed land or land adjacent to existing development, in highly sustainable locations.
- As aforementioned, both Sites 3 and 4 are indivisible from a comprehensive masterplanned approach at Sandown Park Racecourse and as such, will able the overall delivery sustainable development as follows:
 - Significant investment in the Borough's economy to secure the future of Sandown Park as a national/borough asset as a sporting venue and visitor facility;
 - Direct/indirect local employment opportunities;
 - Enhanced recreational and community provision and improved access to Esher town centre;
 - Contribution to local housing supply (including affordable housing), and
 - Delivery of a comprehensive drainage system that will ensure no increase in flood risk or drainage issues.

10.67 In addition, as set out in the accompanying assessment, flood risk has been managed and mitigated at both Sites 3 and 4 as follows:

- Site 3 :
 - Ensuring that the finished floor level is raised about the modelled 1% Flood Level, plus the required Climate Change Allowance and a regional correction (appropriate elevations have been incorporated into the proposal design).
 - The proposed development provides an opportunity for betterment of the existing drainage and water management within the site's boundary, thus surface water flooding to the proposed development is not anticipated, nor is an increase in fluvial or pluvial flood risk to external receptors.
 - Whilst escape routes will need to be considered, if SuDS methods are used, it is considered that the risk of increasing flood risk to or from the development is small.
- Site 4:
 - Ensuring that the finished floor level is raised about the modelled 1% Flood Level, plus the required Climate Change Allowance and a regional correction.
 - Appropriate mitigation methods will limit increased floor risk to flood receptors downstream, ensure that surface water run-off can be retained, attenuated or infiltrated within the site boundary, and be designed to manage volumes discharged off-site to a rate equivalent to the greenfield run-off rate.
 - If SuDS methods are used, it is considered that the risk of increasing flood risk to or from the development is small.

10.68 **As the above demonstrates, both the NPPF's flood sequential and exception tests have been applied and addressed by the proposed development. The proposals therefore also accord with local policies CS26 and DM5 which confirms that they are acceptable in flood risk and drainage terms.**

GROUND CONDITIONS

10.69 The proposals are informed by a Phase 1 Geotechnical Report, prepared by Listers Geo which provides an assessment of the potential ground conditions and potential for any soil contamination at the sites.

10.70 It identifies sources of potential environmental risk in some parts of the development sites, albeit these do not tell against the proposed developments from coming forward, subject to further intrusive investigations to be by planning condition and are undertaken at the reserved matters stage. This approach has been agreed during pre-application with Officers.

10.71 **In terms of ground conditions, the proposals therefore accord with NPPF paragraph 170 and local policy DM5.**

NOISE

10.72 An Environmental Noise Assessment has been prepared by Sharps Redmore following a consultation exercise with EBC Environmental Health Officers where the scope of assessment was agreed.

10.73 Following a site visit, the desktop assessment has considered both the impact of existing noise sources on the proposed residential sites, as well as the impact of changes to the racecourse as a result of the development. In summary, the assessment confirms that:

- The existing noise climate is dominated by road traffic on Portsmouth Road.
- In accordance with the relevant guidance, acceptable internal and external noise levels can be achieved without the need for special acoustic mitigation measures, and can be secured by an appropriately worded planning condition.
- Following a review against national guidance, the impact of proposed changes to the racecourse shall be negligible on both existing and new residential properties, with noise from mechanical services plant to be designed not to exceed existing background noise levels.

10.74 **The proposals therefore accord with the NPPF and local policies CS17, DM2, and DM5 are therefore acceptable in noise amenity terms.**

LIGHTING

10.75 A Lighting Impact Assessment has been prepared by Graham White Lighting Consultancy following a consultation exercise with EBC Environmental Health Officers where the scope of assessment was agreed.

10.76 Following a site visit and desk top exercise, it is confirmed that the racecourse's existing external lighting installations are compliant with industry guidance advice - CIBSE LG6 Outdoor Lighting Guide, ILE Guidance Note GN01.2011 Reduction of Obtrusive Light.

10.77 Additional mitigation measures within the proposed development sites, including luminaire concealment and masking, ensuring the maximum mounting height of luminaires is 3 metres, and lighting controls with occupancy detection. This is to ensure that:

- The resulting illuminance from the racecourse does not add significantly to existing ambient illuminance external to the site, and
- Projected illuminance levels at the boundary of the proposed development sites do not exceed the recommendations set out within ILE Guidance Note GN01.2011 - Environmental Zone E2 (Table2).

10.78 **The proposals therefore accord with the NPPF and local policies CS17, DM2, and DM5 are therefore acceptable in lighting amenity terms.**

SITE WASTE MANAGEMENT

10.79 An outline Site Waste Management Statement has been prepared by Rapleys LLP, with input JCR's architect and transport consultant.

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- 10.80 In summary, all the proposal sites will be designed to allow for collection vehicles to enter, turn around and exit in forward gear, with bin stores to be easily accessible to residents and collection services. Specifically, the refuse stores are to be located where the refuse collection vehicle can stop with its rear loading point within 10 metres of the store.
- 10.81 Further details can be secured via a suitably worded planning condition.
- 10.82 The CEMP produced will also ensure, inter alia, proper management of site waste removal/re-use during the construction phase.
- 10.83 For further details on the refuse strategies for each site, please refer to the accompanying Design and Access Statement and CEMP.
- 10.84 **The proposals therefore meet the provisions of national policy, local policies DM7 and DM8 and are therefore acceptable in terms of site waste management.**

SUSTAINABILITY AND ENERGY

- 10.85 An Energy and Sustainability Report has been prepared by Element Sustainability, which sets out a sustainability strategy that delivers a building regulation and policy compliant scheme.
- 10.86 It is expected the proposed development will use on-site low carbon and renewable energy solutions, where possible and viable.
- 10.87 With regards to energy, there are no specific policies requiring emissions reductions beyond the regulatory compliance standard (including the Code of Sustainable Homes and its energy targets, which have been omitted from the policy requirements).
- 10.88 In terms of sustainability performance, a range of design features could be integrated into the scheme order to limit energy demand and CO₂ emissions from the operation of dwellings and to enable occupants to lead low impact lifestyles, including:
- Enhanced material specification and fabric-led energy strategy;
 - Efficient ventilation systems;
 - Potential provision of electric car charging points;
 - New dwellings to be designed to reduce mains/potable water consumption, with water efficient devices/equipment to be considered;
 - Making efficient use of land, whilst safeguarding and improvement the environment;
 - Pollution control during the development cycle, including controls on external lighting and sound insulation initiatives;
 - Flood resilience and resistance measures and drainage management to be designed into the development;
 - Best practice techniques for waste management during the development cycle;
 - Direct access to outdoor activities and recreation and meeting National Space Standards;
 - Implementation of biodiversity enhancement measures;
 - Implementing a Framework Travel Plan(s) to promote existing transport routes, and to complement the sustainable location of the site, and
 - Disability access to be addressed in accordance with the building regulations are far as possible.
- 10.89 In summary, the proposals will therefore be aligned with the energy strategy.
- 10.90 **The proposals accord with relevant local policies CS25, CS27, CS26, CS15, DM5, and DM6 and therefore that they are acceptable in energy and sustainability terms.**

UTILITIES

- 10.91 A Utilities Report undertaken by Waterman to support the planning application has been informed by consultation with the relevant utility providers and regulatory bodies - Thames Water (Water/Waste Supply), SGN, UKPN and BT Open Reach.
- 10.92 From review of the existing infrastructure plans, current loading information and responses received from all utility providers, it has been confirmed that the foul water network has sufficient capacity and that the necessary on/off-site reinforcement connections will be feasible.
- 10.93 In line with the Utilities Report's recommendations, updated programme information will be shared with relevant parties at an early stage to ensure that utility provider programmes for off-site reinforcement works are integrated.

PHASED DELIVERY

- 10.94 The proposed developments will be delivered in phases over several years. Each phase will be delivered in a manner which supports the enhancement and improvement of Sandown Park and would not prejudice the delivery of future phases.
- 10.95 Whilst the overall Phasing Plan remains subject to future approval, the provisional phasing plan is as follows:

Phase 1:

- Facilitator Site 3

Phase 2:

- Facilitator Sites 1 & 2
- Enhancement Site A
- Enhancement Sites E1 and E2
- Enhancement Site D
- Enhancement Site C

Phase 3:

- Facilitator Site 5
- Enhancement Site B
- Enhancement Site F

Phase 4:

- Facilitator Site 4

- 10.96 It should be noted that the phasing for Sites C & D is subject to sales and funding and could come forward therefore within Phase 3 or Phase 4.
- 10.97 For further details please refer to the accompanying CEMP.

PLANNING OBLIGATIONS/COMMUNITY INFRASTRUCTURE LEVY

- 10.98 It is recognised that the development will need to meet its obligations relative to s.106 and CIL matters. In terms of the former, potential s.106 obligations have been discussed through pre-application discussions between the applicant and officers at the local authority. From these discussions it is anticipated that the s.106 agreement will address, inter alia,

affordable housing. However, discussions relative to the detail of any heads of terms will be reviewed and discussed following submission.

10.99 In this context, it is anticipated that the heads of terms of any planning obligations arising will be agreed before the application is presented to committee.

10.100 The development will evidently also be liable to CIL. In this context, it is noted that the following infrastructure is eligible for the Elmbridge CIL:

- Transport;
- Education;
- Leisure, sport and open space;
- Community facilities;
- Public services, and
- Environmental improvements.

11 PLANNING BENEFITS

11.1 In addition to the policy considerations reviewed in the previous chapter, the proposal will bring forward a range of planning benefits. These benefits go well beyond the requirements of policy and further underline that the local authority should be wholeheartedly supporting the proposals.

SUSTAINABLE DEVELOPMENT

11.2 In addition to the policy specific planning considerations reviewed in the previous chapter, the proposal will bring forward the following headline benefits relative to the three roles of planning set out in the NPPF (2018):

Economic

11.3 The proposed development will represent a significant investment to the Borough's economy and will secure the future of Sandown Park as a national and borough's asset as a sporting venue and visitor facility.

11.4 In addition, the proposed enhancements of the Racecourse and new facilities will generate additional induced employment and jobs for the Borough (during the construction and, beyond this, in the operational phases).

11.5 Further, the improvements of Sandown Park will contribute to the economic wellbeing of Esher Town Centre through spin off benefits. In particular:

- One of the aims of the improvement works is to increase average spend by customers, and this additional available revenue will also benefit the town centre, and
- The hotel will encourage visitors to stay longer in the area, thereby encouraging higher use of the services and spend within the town centre, not least at restaurants and drinking establishments.

11.6 As such, the proposals will increase economic activity in the town centre, support local businesses and increase employment.

Social

New community facilities

11.7 In addition to the above, the proposal will supplement the Borough's important community/leisure assets through enhancements of the existing offer and new uses, such as the upgraded nursery building and the proposed family-focused leisure and recreational area.

11.8 In terms of the former, the upgraded facility will be a substantial investment, producing a modern and high quality nursery for the local community.

11.9 In terms of the leisure and recreational area, it will provide not only facilities for families during race meetings, but also be open to the community/general public on non-race days, providing:

- Outdoor play;
- Cycle facilities, on the remodelled kart track;
- A soft-play facility, and
- Ancillary café facilities.

11.10 In this respect, the facility will provide a high-quality venue for local families to bring their children for a range of recreational activities, and a large part of it will be offered to the community free of charge.

Interpretation boards

- 11.11 To highlight the history, historic assets and heritage of the racecourse, and to enhance public interest and appreciation of the site, a network of interpretation boards will be installed.

Integration between town centre and railway station

- 11.12 Building on the site's location between Esher Town Centre and its railway station, the proposal will help Sandown Park integrate with Esher Town Centre and enhance connectivity between the Racecourse site and the train station via improvements to existing pedestrian links.
- 11.13 The proposal will also include substantial public realm enhancement on the development sites close to the Town Centre. These enhancements will contribute significantly to the vitality and attractiveness of Esher Town Centre.

Meeting housing needs generally

- 11.14 Overall, the proposal will deliver a total of circa 318 new residential units which will make a significant contributing towards the Borough's OAN. The local authority's latest published position relative to housing land supply (Elmbridge's Annual Monitoring Report 2016-2017, published in March 2018) confirms that the local authority does not have a five year housing land supply.
- 11.15 Further, this shortfall was reviewed in detail in the appeal decision for the land east of Weylands house, and the Inspector found that the level of deliverable supply was in the region of merely 2.65 years, and that there was little prospect of a significant improvement in supply in the short term in the absence of the appeal scheme (for which the appeal was dismissed).
- 11.16 Although it is recognised that an unmet housing need will not, in of itself, outweigh any harm to the Green Belt. Nevertheless, bringing forward much needed housing is a key consideration as part of an overall balance, and it is noted that - in the case of the land east of Weylands House, the Inspector (and Secretary of State) attached significant weight to the benefit of housing delivery.

Meeting affordable need (as far as possible)

- 11.17 There is a substantial identified need for affordable housing at the local level, with latest housing evidence base confirming that across the last six monitoring years, EBC is - on average - failing to meet its Local Plan target of 77 affordable homes per annum. The current SHMA shows a need for 332 affordable homes per annum.
- 11.18 The provision of affordable housing from the proposed development (15%) will make a measurable contribution to the Borough's affordable housing requirements that is appropriate in terms of the balance between established need, viability and the need for ensuring that the quantum of development in the Green Belt is no more than is required in order to support the necessary improvements to the racecourse.
- The proposed development provides enhanced recreational and community provision and improved access to Esher town centre/train station, which will enhance the quality of life for the community; and
 - The proposed development will improve local housing supply, which is in the interest of social sustainability given the link between quality of life and access to an adequate choice of good quality housing.

Accessibility

- 11.19 As previously confirmed, the proposal will address all accessibility requirements relative to the proposal sites. However, the development will also facilitate, through the wider refurbishment works, improvements to accessibility across the entire racecourse.

Environmental

The site's sustainable location

- 11.20 As set out in Section 2, the racecourse links Esher town centre with its railway station. Further, it is accessible to a range of transport options, including walking, cycling, bus, train and others. As a result, and notwithstanding the policy considerations reviewed in this report relative to the Green Belt, it is a location that national and local policy would normally direct development to.

Ecology

- 11.21 An ecological management plan will be drawn for the entire racecourse site, beyond the individual development sites and any enhancements required as a result of their development. This plan to be implemented by the grounds team, with the aim of managing the racecourse in a manner tailored to maximising biodiversity value.
- 11.22 In addition, it is proposed to implement additional bat and bird boxes around the racecourse site, to be reviewed and detailed in a "Wider Site Enhancement Plan". Further, it is proposed that additional native woody hedgerows be established, where possible.
- 11.23 In this respect, the ecological enhancements proposed go well beyond what would be necessary to support the development.

Heritage

- 11.24 The following enhancements to heritage assets are proposed, that go beyond what would be necessary to support the development:
- A contribution to the enhancement of the listed Traveller's Rest, and
 - Installation of bollards to the listed racecourse gates.

SUMMARY

- 11.25 In this context, the proposals evidently bring substantial benefits with reference to the three roles of planning. This further tells in favour of planning permission being granted.

12 CONCLUSIONS

12.1 This Statement forms part of a suite of technical documents which have been prepared in support of this hybrid application with key considerations being addressed in this and other documents.

12.2 However, before reviewing the application in detail, the rationale of the proposal must be recognised, as follows:

- JCR are the largest racecourse group in the country, and are seeking to invest in, and improve, their facilities nationwide.
- The racecourse is an essential outdoor sports, leisure and community facility and generates substantial, and across-the-board, planning benefits for Esher, Elmbridge and further afield. It should, therefore, be supported by the planning system.
- The current facilities are out of date, deteriorating and less than fully utilised, in need of substantial renovation and modernisation to be fully fit for purpose, and major capitally intensive works are required in order to secure the site's future. To ensure that these works are successful, the following principles must be adhered to:
 - Any improvements must be very high quality as a bare minimum, and should aim for excellence as standard.
 - Any major capital improvements must pay for themselves.
- JCR have a vision for the site that will enhance the site's offer and deliver a wider and enhanced community provision. The consequence of not carrying out the works, or not carrying them out properly would be substantial harm for JCR, the Borough and more broadly, and be contrary to the principles of the planning system (discussed later in this document, and in the Green Belt Statement attached to this application).
- This investment needs to be facilitated by a limited amount of residential development (including an element of affordable housing).
- As confirmed in the Green Belt Statement attached to this application, all reasonable alternative approaches to development have been considered, but have been found lacking. There is therefore no reasonable alternative to the development sought by this planning application.

12.3 With regards to this Statement, it sets out the key planning matters relative to the proposals. In this context, the following conclusions are drawn:

1. The Masterplan-led approach to the delivery of the vision for Sandown Park Racecourse to secure its long term future as a nationally and locally important racing and leisure/community venue is entirely appropriate in the context of the Green Belt setting.
2. The proposal as a whole can be considered as appropriate development within the Green Belt, as it falls into the types of development described in Paragraph 145 of the NPPF. Even if this were not appropriate, of the positive substantial planning benefits of the proposal would, collectively, be very special circumstances that clearly outweigh any harm by reason of inappropriateness and any other harm resulting from the proposal
3. The proposal has been designed and developed in accordance with a range of other planning policies, and all relevant development management considerations have been addressed.
4. The proposals would bring forward substantial planning benefits which go beyond the requirements of planning policy.

12.4 In these terms, the proposals should be wholeheartedly supported by the local authority, and planning permission should be forthcoming at the earliest possible juncture.