



**Sandown Park
Racecourse, Esher**

Proof of Evidence of:
Ben Connolley
BSc (Hons), PG DipLA, CMLI

In respect of:
Landscape Matters

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

PINS REF:
APP/K3605/W/20/3249790

LPA REF:
2019/0551

**Volume III:
PLANS, KEY VIEWS AND
APPENDICES**

October 2020
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edp5237_r008b**

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	Report Ref: edp5237_r008			
	Author	Formatted	Peer Review	Proofed by/Date
008 FIRST DRAFT	BC	CR-	CJM	-
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008b	BC	-	-	FJ 191020

Plans

- Proof Plan BC 1** Site Location
(edp5237_d018a 19 October 2020 BC/CJM)
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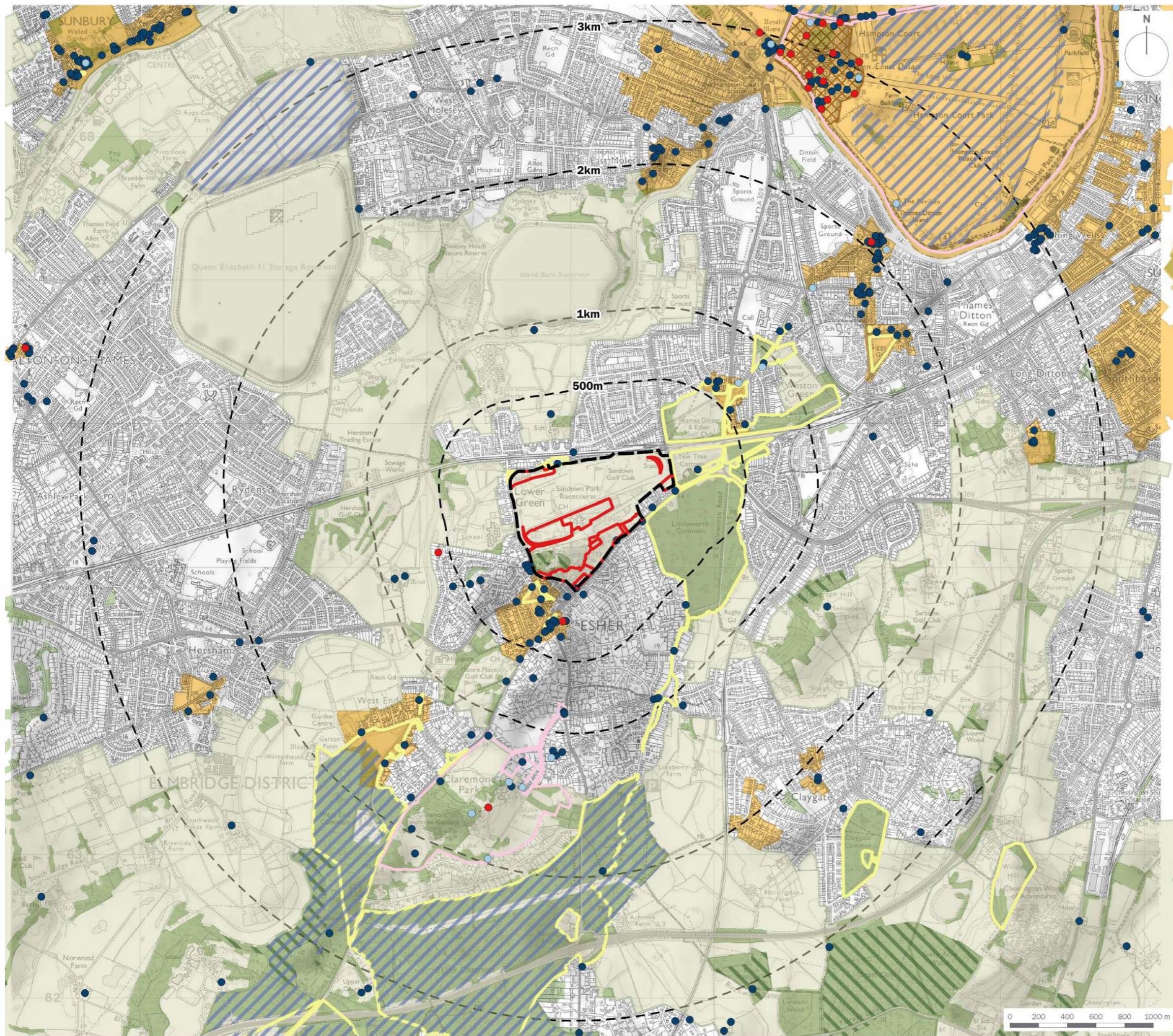
PROOF PLAN BC 1

-  Sandown Racecourse
-  Operational Plots
-  Range Rings (at 500m and 1km intervals)





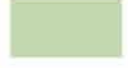
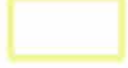






client	The Jockey Club Racecourses Ltd	
project title	Sandown Park Racecourse, Esher	
drawing title	Proof Plan BC 1: Site Location	
date	19 OCTOBER 2020	drawn by BC
drawing number	edp5237_d018a	checked CJM
scale	Refer to Scale Bar @ A3 QA JTF	






Registered office: 01285 740427 - www.edp-uk.co.uk - info@edp-uk.co.uk



PROOF PLAN BC 2

-  Sandown Racecourse
-  Operational Plots
-  Range Rings (at 500m and 1km intervals)
-  Green Belt
-  National Forest Inventory
-  CRoW act 2000 Access Layer
-  Sites of Special Scientific Interest (SSSI)
-  Ancient Woodland
-  Registered Parks and Gardens
-  Scheduled Monuments
-  Local Nature Reserves
-  Conservation Area

Listed Buildings

-  Grade I
-  Grade II*
-  Grade II

client
The Jockey Club Racecourses Ltd

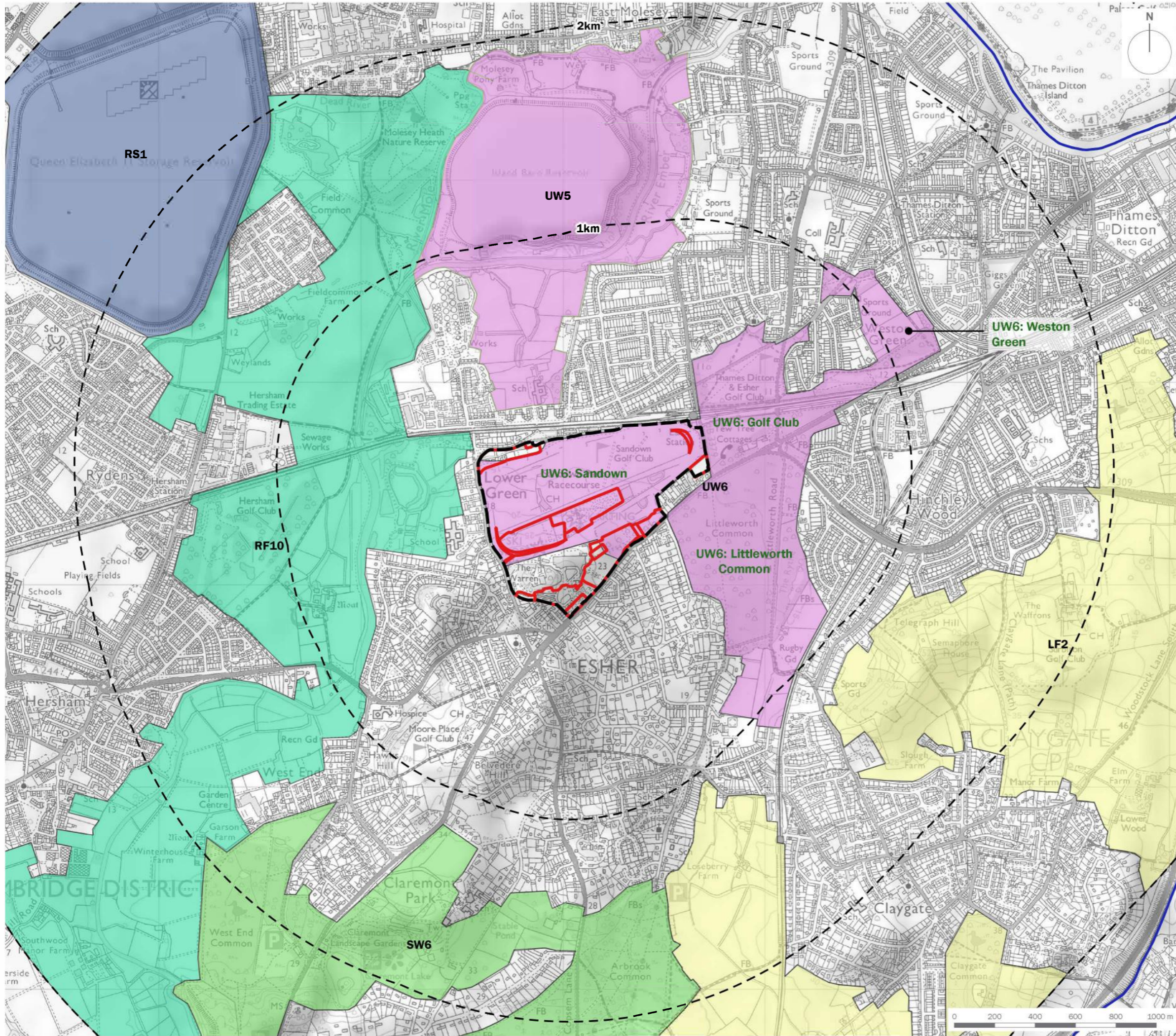
project title
Sandown Park Racecourse, Esher

drawing title
Proof Plan BC 2: Broad Environmental Planning Context



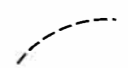

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PROOF PLAN BC 3

-  Sandown Racecourse
-  Operational Plots
-  Range Rings (at 1km intervals)
-  County Regions

Surrey Landscape Character Assessment 2015: Elmbridge Borough

-  UW6: Lower Green to Weston Green and Littleworth Common
-  UW5: Island Barn Reservoir and River Ember
-  LF2: Claygate Rolling Clay Farmland
-  RF10: Lower Mole River Floodplain
-  RS1: Thames Valley Reservoirs
-  SW6: Fairmile to Esher Sandy Woodland

EDP Appraisal of UW6

-  UW6: Sub Areas (EDP Appraisal)

client
The Jockey Club Racecourses Ltd

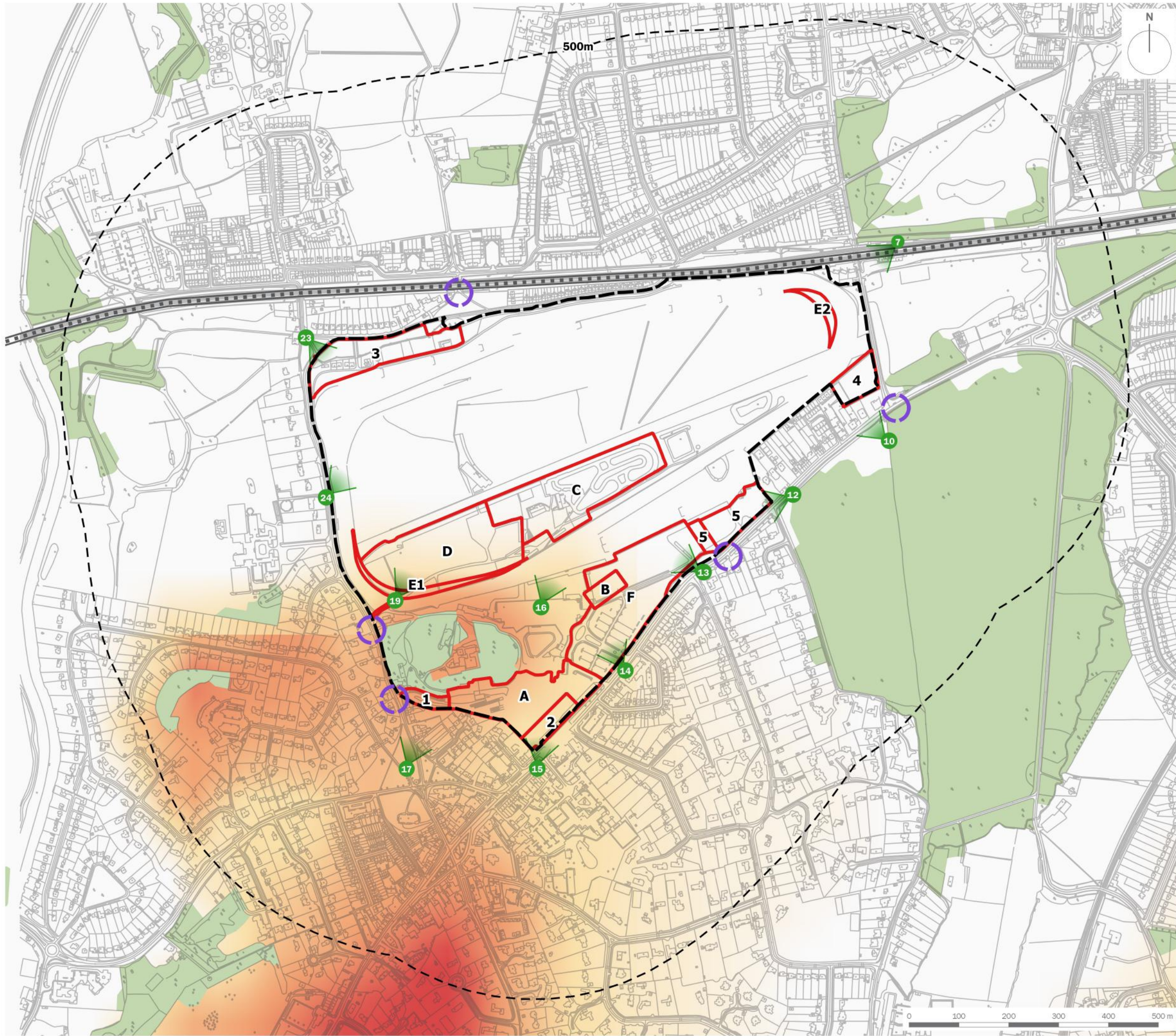
project title
Sandown Park Racecourse, Esher

drawing title
Proof Plan BC 3: Landscape Character

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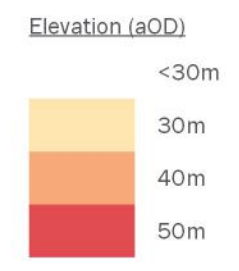


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PROOF PLAN BC 4

-  Sandown Racecourse
-  Individual Development Plots
-  Range Rings (at 500m intervals)
-  National Forest Inventory
-  Railway
-  Photoviewpoint Location
(Agreed with LPA and assessed within submitted LVA - Core Document CD5.52)
-  View Location Recorded by LPA



client
The Jockey Club Racecourses Ltd

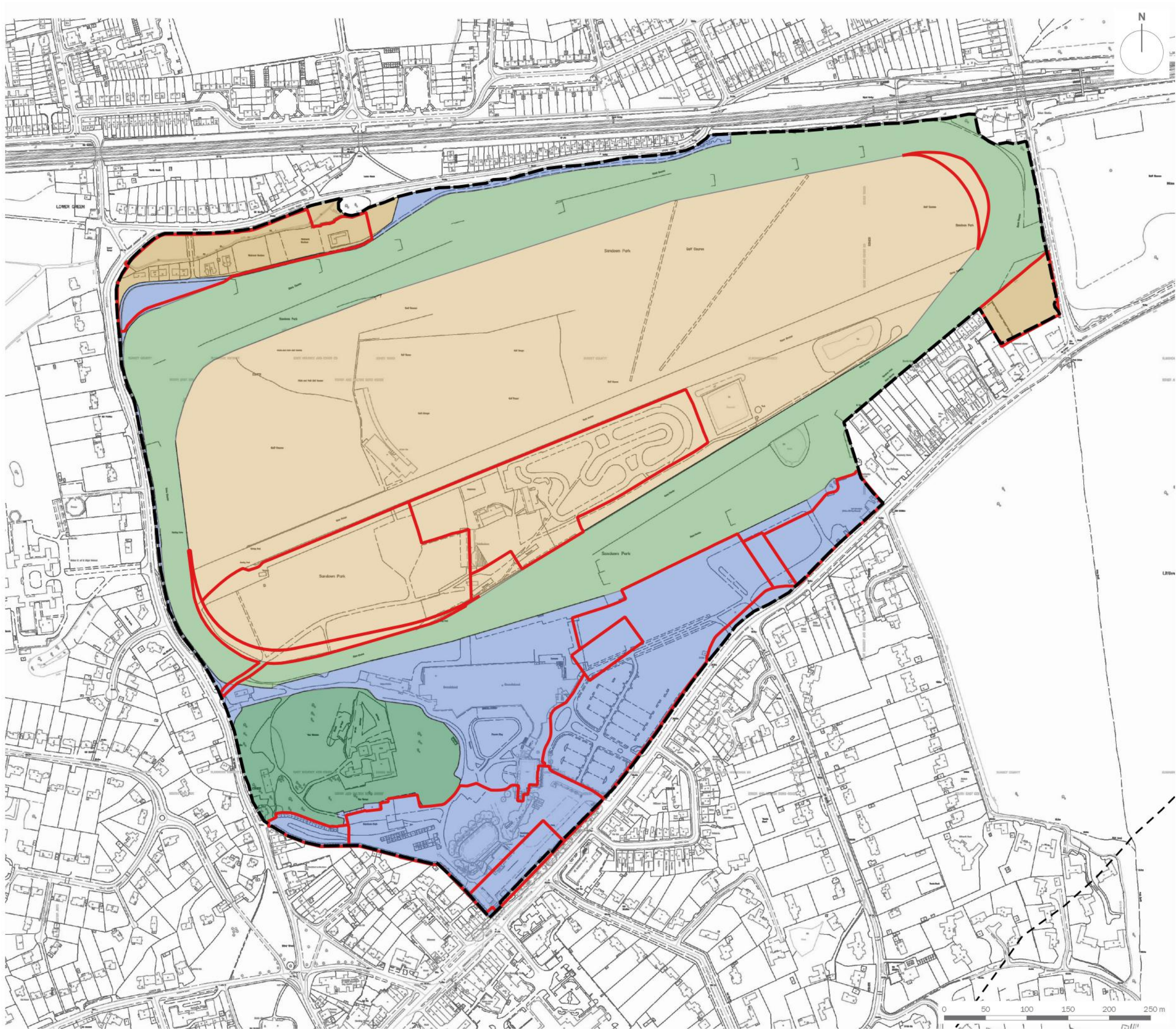
project title
Sandown Park Racecourse, Esher

drawing title
Proof Plan BC 4: Landscape Viewpoint Summary








date	19 OCTOBER 2020	drawn by	BC
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scale	1:7,500 @ A3	QA	JTF



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PROOF PLAN BC 5

-  Sandown Racecourse
-  Operational Plots
- Site Areas**
-  Inner Core
-  Racetrack
-  Racecourse Facilities
-  Peripheral Areas
-  The Warren

client
The Jockey Club Racecourses Ltd

project title
Sandown Park, Esher

drawing title
Proof Plan BC 5: Areas of the Appeal Site

date **19 OCTOBER 2020** drawn by **BC**
drawing number **edp5237_d023a** checked **CJM**
scale **Refer to Scale Bar @ A3 QA** JTF



the environmental
dimension partnership

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(edp5237_d022a 19 October 2020 GY/BC)

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Photoviewpoint EDP 11	View taken from Portsmouth Road, opposite gates to the Racecourse, looking north-west

Approximate extent of Sandown Racecourse



To be viewed at comfortable arm's length

Approximate extent of Sandown Racecourse



To be viewed at comfortable arm's length

Photoviewpoint EDP 3: View taken from Racecourse access road on higher ground within the south-western areas of the Racecourse, looking north

Approximate extent of Sandown Racecourse



To be viewed at comfortable arm's length



To be viewed at comfortable arm's length

Photoviewpoint EDP 5: View taken from Esher Green, looking north-east

Approximate extent of Sandown Racecourse



To be viewed at comfortable arm's length

Photoviewpoint EDP 6: View taken from central Esher (Portsmouth Road), looking north

Approximate extent of Sandown Racecourse



To be viewed at comfortable arm's length

Photoviewpoint EDP 7: View taken from Portsmouth Road, opposite the entrance to the Racecourse, looking north

Approximate extent of Sandown Racecourse



To be viewed at comfortable arm's length

Photoviewpoint EDP 8: View taken from Portsmouth Road, on approach to Esher, looking north-west



Approximate extent of Sandown Racecourse

To be viewed at comfortable arm's length

Photoviewpoint EDP 9: View taken from Littleworth Common, looking north-west

Approximate extent of Sandown Racecourse



To be viewed at comfortable arm's length

Photoviewpoint EDP 10: View taken from a bridge over the railway line within Esher train station, looking south-west

Approximate extent of Sandown Racecourse



To be viewed at comfortable arm's length

Approximate extent of Sandown Racecourse



To be viewed at comfortable arm's length

Appendix BC 1
Witness Qualifications and Experience

Appendix BC 1

Witness Qualifications and Experience

Witness Qualifications and Experience

- ABC.1.1 This Proof of Evidence (PoE) on landscape matters has been prepared by Ben Connolley. My professional qualifications include a Post Graduate Degree in Landscape Architecture from the University of Gloucestershire and a Degree in Countryside Management from The University of Wales, Aberystwyth. I am a Chartered Member of the Landscape Institute.
- ABC.1.2 I am an Associate Landscape Architect at The Environmental Dimension Partnership Ltd (EDP). EDP is a Registered Practice of the Landscape Institute and Corporate Member of IEMA. The practice represents private and public sector clients with land and development interests throughout the UK. Since its formation in 2005, my colleagues and I have been involved in over 1,000 projects within the UK, including many mixed-use urban extensions. All work is obtained on repeat business and recommendation. EDP has now grown to a team of over 100 environmental specialists in four offices across the UK.
- ABC.1.3 I have 15 years' experience covering landscape design, landscape assessment and landscape management. In recent years, I have specialised in the assessment, in landscape terms, of a very wide range of development proposals, including development in designated and sensitive landscapes such as Areas of Outstanding Natural Beauty (AONBs). I have been involved in the design and assessment of numerous mixed use and residential schemes, including many urban extensions and addressed projects from the feasibility stage through to planning application and detailed construction phases.
- ABC.1.4 The evidence that I have prepared and provide for this inquiry is true and has been prepared and is given in accordance with the guidance of my professional Institute. I confirm the opinions expressed are my true and professional opinions.

Appendix BC 2
Scope of Evidence

Appendix BC 2 Scope of Evidence

Scope of Evidence

ABC.2.1 The application was considered by Committee on 01 October 2019 and, against officer recommendation, was refused. My evidence, therefore, addresses the landscape issues raised in Reasons for Refusal (RfR) 1 and 2 which, of relevance to landscape and visual matters, state that (with my emphasis):

- 1) *“The proposed development represents inappropriate development in the Green Belt which would result in **definitional harm and actual harm to the openness of the Green Belt** and it is not considered that the very special circumstances required to clearly outweigh the harm to the Green Belt and any other harm, including impact on transport (highway and public transport capacity), air quality and insufficient affordable housing provision, have been demonstrated in this case. **The proposed development by reason of its prominent location would be detrimental to the character and openness of the Green Belt** contrary to the requirements of the NPPF, Policies CS21 and CS25 of the Elmbridge Core Strategy 2011, Policies DM5, DM7 and DM17 of the Elmbridge Development Management Plan 2015; and*
- 2) *It has not been demonstrated that the level of residential development and hotel proposed could be designed without resulting in an **adverse impact on the character of the area**, in conflict with Policies CS9 and CS17 of the Elmbridge Core Strategy 2011, Policies DM2 and DM12 of the Elmbridge Development Management Plan 2015, the Design and Character SPD 2012 and the NPPF”.*

Appendix BC 3
The Appeal Site and its Landscape Context

Appendix BC 3

The Appeal Site and its Landscape Context

The Appeal Site and its Landscape Context

ABC.3.1 The character of the appeal site and its context is described in the LTVA, DAS and elsewhere. I do not propose to repeat detailed descriptions at length in the PoE, but a brief ‘scene setting’ exercise is helpful as a precursor to the case-making in **Section 3**. The location of the appeal site is shown on **Proof Plan BC 1** which provides a broad scale Ordnance Survey map.

ABC.3.2 In addition to the review of landscape character contained within the LTVA (**Core Document CD5.52**), and comments included within the Officer’s Report to Planning Committee (**Core Document CD7.3**), a summary of the key conclusions relating to local landscape character is provided below:

- With the exception of Site 5, all residential development sites are located outside Character Area UW6 and, therefore, are considered to form part of the urban context;
- As set out within the Surrey Landscape Character Assessment (SLCA) (2015) (refer to **Appendix BC 6**), *“roads and other urban influences limit tranquillity..., despite that, the area provides both open and enclosed green space as a contrast and relief to the surrounding Built Up Areas”*. As above, the majority of the appeal site is defined as urban, falling outside Character Area UW6, and therefore provides limited, if any, contribution to providing *“pockets of quality landscape, of historic importance or importance for existing biodiversity and biodiversity potential”*, nor do the proposed housing areas *“provide open areas that are rural or natural in character”*;
- Similarly, as set out within the Elmbridge Borough Landscape Sensitivity Study (2019) (refer to **Appendix BC 7**), Sandown Park is identified within Landscape Unit UW6-A. It states that *“Sandown Park in the west is relatively private and enclosed by fencing, and therefore contributes little to the scenic qualities of adjacent settlement edges, however its large scale contributes to the perceived gap between settlements”*, and that *“The Landscape Unit is less sensitive to development in the west where the landscape is less distinct, displays fewer characteristics representative of wider landscape character and is in poorer condition”*. Importantly, the introduction to the Elmbridge Borough Landscape Sensitivity Study states that (with my emphasis) *“The Landscape Sensitivity Study is a Borough wide assessment and has been undertaken at a scale of 1:25,000. It is appropriate for decision making at this scale. Finer grain analysis will be needed for site specific matters”*.
- Despite there being a sense of open character within the Racecourse itself, which contains no Public Rights of Way (PRoW) within it, the landscape context of the Racecourse is impacted by its urban context which *“limit tranquillity”* according to the 2015 LCA;

- The Racecourse is a private area which is valued, in a landscape sense, only for its function as a Racecourse and for the recreational uses within it;
- Other than having value in its function as a Racecourse, with recreational use within its core (refer to **Proof Plan BC 5**), there is no reason to conclude that each development site has any elevated landscape value or importance over and above Character Area UW6; and
- Perceptually, substantial built form is already present within parts of the Racecourse and many of the areas surrounding the central core area have substantial built development on them which, in the case of the area to the south of the central core, includes buildings with significant mass, height and bulk.

ABC.3.3 As set out within the LTVA, in landscape/townscape terms, despite local topography within the Racecourse suggesting otherwise, namely high ground on The Warren, there is a very limited sense of association between the Racecourse and the wider setting; being divorced both physically and visually from it by mature vegetation, a railway line and large areas of housing. This point is confirmed within the Case Officer's report to Committee, which states that *"The Site is broadly surrounded by urban areas of Esher and enclosed by mature trees and shrubs and therefore its open character can be appreciated only from a very few public viewpoints. The Site is dominated by the Grandstand, which offers long distance views towards London for its visitors. Views across the Site from Esher town are limited due to the position of the woodland at The Warren located on higher ground and the Grandstand"*.

The Appeal Proposals

ABC.3.4 The appeal proposals are described in considerable detail in the DAS. From a landscape perspective, there are a number of key landscape design principles that have informed the Appeal Proposals, including:

- A comprehensive analysis of the site context clearly preceded the design process;
- Read as a whole, it is clear from the DAS and supporting information that that the masterplan has been informed from the outset by a comprehensive range of environmental studies;
- The findings of the LTVA were fed into the evolving design, with the design reflecting and indeed contracting in response to environmental considerations, including:
 - New tree planting is proposed in key areas of each of the development parcels. In addition to enhancing the existing landscape framework, this would assimilate the proposed built form and, through the use of appropriate species and quantities, address each site's relationship to the local context;
 - The proposed development has retained the well-treed characteristics of the eastern edge of the Racecourse;

- The proposed development has been set back from Portsmouth Road, being supported by new tree planting, to maintain the approach to Esher from the east;
 - Uses within the central areas of the Racecourse are such that the existing open character of the Racecourse as a whole would be maintained; and
 - With particular regard to Site 3, existing landscape features would be reinforced with additional planting measures in order to maintain the 'green' setting to Lower Green Road and the character of the perceived well-treed residential context to the north.
- With consideration of the Racecourse as a whole, the proposed development is concentrated in areas where it is considered most appropriate in landscape and visual terms to do so.

Appendix BC 4
The Environmental Planning Context

Appendix BC 4

The Environmental Planning Context

ABC.4.1 Detailed consideration of landscape/townscape-related designations and policy considerations within 1km of the Racecourse have been set out within the LTVA. However, for completeness, I include **Proof Plan BC 2** which extends the study area to 3km. In summary, this confirms that:

- The Racecourse is entirely located within the Green Belt. Green Belt is not a landscape or townscape designation aimed at protecting landscape, but a spatial planning tool. The Racecourse's location in the Green Belt does not confer or imply any elevated value or quality in landscape terms;
- There are two Conservation Areas (CA) in close proximity to the appeal site; Esher CA, which is located immediately to the south-west of the Racecourse, and Weston Green CA, which is located 500m to the north-east;
- There is a Scheduled Monument on the corner with Café Rouge, namely 'The White Lady Milestone, junction of Portsmouth Road and Esher Station Road';
- There are no Registered Parks and Gardens within 1km of the Racecourse;
- There are a number of listed buildings within settlements surrounding the Racecourse, with many relating to the conservation areas named above. Listed Buildings include the Post by the Tollhouse on Portsmouth Road which is Grade II Listed;
- The nearest block of Ancient Woodland is located within the south-western areas of the Racecourse, currently on land which provides a dry ski slope/gym/fitness centre. Notably, this block of Ancient Woodland at 'The Warren', Sandown Park, is identified as a 'key landmark'; and
- Whilst there are a number of PRoW within the wider context, largely to the west of the Racecourse in close proximity to the River Mole, none were found to afford views of the Racecourse owing to the intervening built context.

ABC.4.2 As set out within the LTVA, it is not the function of Landscape/Townscape and Visual Assessment to specifically assess the effects on the setting of conservation areas, ecological and/or heritage assets. Nonetheless, the presence of these features can add to the value of the landscape as well as having value in their own right. It is important to note that the assessment of potential visual effects of the proposals on the settings of listed buildings are considered as part of this LTVA only to the extent that they contribute to the overall local townscape and visual character, and does not relate to any potential effect upon the setting or character of the heritage asset.

ABC.4.3 In all cases, the heritage assets identified above, in particular the Post by the Tollhouse on Portsmouth Road and a Scheduled Monument on the corner with Café Rouge, are to be retained.

ABC.4.4 In considering the intrinsic landscape value of the appeal site, the appeal site has no designatory status in landscape terms, nor is it proposed to have such status. There are a number of ecological and heritage designations within the local urban context which contribute the overall dimension of landscape value and character. However, while all landscapes have some intrinsic value, as recognised by the NPPF para 170 (b), I don't consider that any part of the appeal site has elevated value above the rest of the Character Area UW6. With the exception of Site 5, all residential development sites outside Character Area UW6 and, therefore, are considered to form part of the urban context.

Appendix BC 5

BC Appraisal of the Council's 5 Additional Viewpoints

Appendix BC 5

BC Appraisal of the Council's 5 Additional Viewpoints

- ABC.5.1 The visual appraisal contained within the LTVA was informed by a consultation process with the LPA to agree the viewpoint locations and methodology on which to base the appraisal. This consultation was undertaken by phone and email, including discussions as part of a formal pre-application meeting, during November 2018.
- ABC.5.2 The only request from the Council was that an additional viewpoint location be recorded from Portsmouth Road, included within the LTVA as **Photoviewpoint EDP 11**.
- ABC.5.3 The LTVA provides an appraisal of the visual receptors likely to be affected by the appeal proposals at paragraphs 5.9 to 5.23 and concluded at paragraph 5.26 that *“There are a number of sensitive receptors that are likely to experience effects as a result of the proposed development. Those that are most likely to experience the greatest change as a result of the proposed development include residents in close proximity to the Racecourse and those on higher ground on More Lane.”*
- ABC.5.4 Following confirmation that the Council intend to record five additional views to those provided within the LTVA (the locations are shown on my **Proof Plan BC 5**), I undertook a further visit to the appeal site, with summary comments below:
- The appeal site is as described in the Case Officer's Report to Committee, which states at paragraph 9.8.2.38 that (with my emphasis):
 - *“The Site is broadly surrounded by urban areas of Esher and enclosed by mature trees and shrubs and therefore its open character can be appreciated only from a very few public viewpoints;*
 - *Views across the Site from Esher town are limited due to the position of the woodland at The Warren located on higher ground and the Grandstand;*
 - *Further down Portsmouth Road, the views open up across the carparking area (Site F), however the boundary treatment and the presence of mature dense vegetation and trees on Site 5 again do not allow for the views of the racecourse beyond. For the same reasons, only very limited views across the Site are available from Station Road and Lower Green Road; and*
 - *More public views are available from More Lane, where approximately 1.8m high wooden fence with scattered trees and shrubs bound the Site”.*

My Appraisal of the Council's 5 Additional Views

- ABC.5.5 The Guidelines for Landscape and Visual Impact Assessment – Third Edition (LI/IEEMA, 2013) (GLVIA3), states that (paragraph 6.22) *“The detailed location of each viewpoint should be carefully considered and should be as typical or representative as possible of the view likely to be experienced there”*. In my opinion, in all five cases, the views

provided by the Council fail to adequately show the full context of each site, rather a framed view which shows little built form within it.

- ABC.5.6 The Council's 'View from Cobb Green looking over the pond into Site 3 (from footpath)' provides a narrow view looking from Lower Green Road. Here, the view looks into the Racecourse, although no built form or features that identify the view with Sandown Racecourse can be seen. Essentially, the view could be recorded from anywhere and is not considered typical or representative of views experienced from Lower Green Road, either from the public domain or in private views.
- ABC.5.7 The Council's 'View from junction of Station Road and Portsmouth Road (from traffic island)' again provides a narrow view, looking to the access from Site 4 from the south-east. Here, the view shown excludes any built form within the local context which characterises local views (refer to **Photoviewpoint EDP 9** within the LTVA).
- ABC.5.8 The Council's 'View from Portsmouth Road looking into Site 5 (from entrance to Little Orchard Place)' further illustrates how contained local views are for receptors travelling along Portsmouth Road. As illustrated by the Council, the Racecourse is not prominent in these local views however, the Council's image does not include any built form within it and as such, is not considered to reflect the true character of Portsmouth Road (refer to LTVA **Photoviewpoints EDP 6, 7, 8, 9** and **11**).
- ABC.5.9 The Council's 'View from More Lane looking into Site 1 (through proposed main entrance)' illustrates the urban context of Site 1. The view looks at a security gate with little, if any, appreciation of built form within the local context. The view reiterates the enclosure of Site 1 in views from the public domain.
- ABC.5.10 The Council's 'View from More Lane looking towards Site 3' looks from elevated ground on More Lane. A view through an access gate to the Racecourse is possible, with views extending across to Greater London. Importantly, the Council's view reiterates that built form within Site 3 is an identifiable component within the view, adding to the generally cluttered character of the Racecourse interior in this channelled view. As set out within the LTVA, in the long-term, proposed landscape measures within Site 3 would assimilate the proposal into the local context, being seen as part of the built framework of the Racecourse with mature tree cover providing a contribution to the wider landscape beyond. The proposed development would not obscure longer views to London from higher ground within the Racecourse.

Summary

- ABC.5.11 To summarise, the application material submitted with the application was agreed with the Council through a consultation process which resulted in the request for a single additional viewpoint. In my opinion, the views provided by the Council fail to adequately show the full context of each site, rather they provide a framed view which shows little built form within it.
- ABC.5.12 As such, any conclusions drawn from views that are not deemed to be representative of the local context are at risk of being misguided.

Appendix BC 6

Extract from Surrey Landscape Character Assessment: Elmbridge Borough (April 2015)

Surrey Landscape Character Assessment: Elmbridge Borough



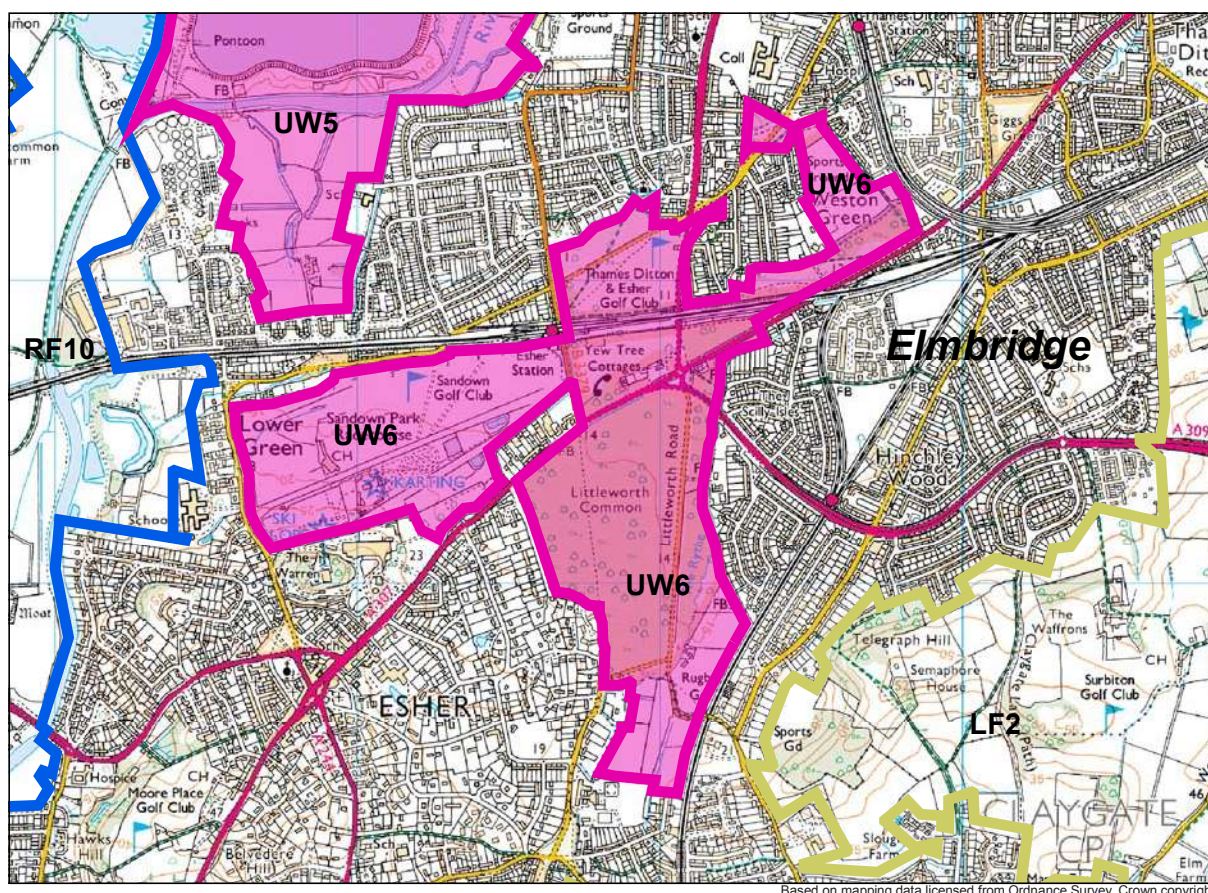
April 2015

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UW6: LOWER GREEN TO WESTON GREEN AND LITTLEWORTH COMMON

Location and Boundaries

Located to the north-east of Esher, within the urban area at the northern edge of the county.

Key Characteristics

- Underlain by Claygate Member Sand, Silt and Clay, and London Clay Formation Clay and Silt solid geology.
- A collection of areas which include Sandown Park Racecourse, areas of golf course, the wooded Littleworth Common, and other areas of common, plus sports pitches.
- There are busy roads and railway, converging toward the centre of the area.
- Sandown Park Racecourse and adjacent golf course are relatively private areas, but the majority of the remaining part of the area is a valuable recreational resource, with Open Access Land and public rights of way links. Esher railway station is adjacent to the area and connects to public rights of ways.
- Significant areas are registered as Common Land, including Littleworth and Ditton Commons, and the edge of Weston Green Conservation Area is to the north. The commons are designated as Sites of Nature Conservation Importance.
- Parts of Littleworth Common have a sense of remoteness due to dense woodland which screens the surrounding urban areas. However, roads and other urban influences limit tranquillity elsewhere, despite that, the area provides both open and enclosed green space as a contrast and relief to the surrounding Built Up Areas.

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LANDSCAPE TYPE UW: SIGNIFICANT GREENSPACES WITHIN URBAN AREAS EVALUATION AND GUIDANCE

EVALUATION

Although varied, all these character areas provide pockets of quality landscape, of historic importance or importance for existing biodiversity and biodiversity potential, embedded within the Built Up Areas. They provide open areas that are rural or natural in character in direct contrast to the surrounding dense urban areas of north Surrey, and between Aldershot and Ash.

GUIDANCE

- Conserve and enhance biodiversity value of remnant habitats, and key landscape characteristics that are identified as priority habitats.
- Seek opportunities to link existing habitats through habitat restoration.
- Protect and enhance the landscape setting to adjacent settlements and urban areas.
- Maintain and enhance the network of public access, whilst ensuring significant biodiversity value and resource of these areas is sensitively managed and protected.
- Encourage understanding of the biodiversity and historic elements of the landscape.
- Conserve the historic landscapes, such as along the Hogsmill and around Nonsuch Park.

Appendix BC 7

Extract from Elmbridge Borough Landscape Sensitivity Study (2019)

Elmbridge Borough Council
Elmbridge Borough Landscape Sensitivity Study:
Final Report | January 2019

Elmbridge Borough Landscape Sensitivity Study

Final Report



ARUP

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1.0 Introduction

Scope and purpose of the Landscape Sensitivity Study

Ove Arup and Partners Limited (Arup) was commissioned by Elmbridge Borough Council in August 2018 to undertake a Landscape Sensitivity Study to inform growth options and the spatial planning evidence for Elmbridge Borough's emerging Local Plan. The study also provides greater detail to support the strategic landscape information contained in the Surrey Landscape Character Assessment, 2015¹. This report outlines the methodology and findings for the study and is structured as follows:

- Methodology and landscape classification
- Summary findings
- Landscape assessment and recommendations

Supporting information is contained in the Appendix.

This study follows a Green Belt Boundary Review undertaken by Arup in 2016 and a further assessment of sub-divisions undertaken in 2018. The relevant aspects of these studies have been used to inform the Landscape Sensitivity Study, although the purpose of this study is quite different, focusing on character rather than strategic planning functions.

What does the Landscape Sensitivity Study contain and how should it be used?

The Landscape Sensitivity Study, assesses the extent to which the character and quality of the landscape in the Borough is sensitive to change from the introduction of a development scenario, in this case large scale residential and mixed-use development.

The Landscape Sensitivity Study will be used to inform planning policy decisions and articulate policies in the new Local Plan. It is also intended to fulfil a strategic role in development management and should be used in conjunction with the 2015 Landscape Character Assessment and the Green Belt Boundary Review. It is therefore also part of the iterative development of the Local Plan evidence base.

The Landscape Sensitivity Study is a Borough wide assessment and has been undertaken at a scale of 1:25,000. It is appropriate for decision making at this scale. Finer grain analysis will be needed for site specific matters. The study considers landscape sensitivity in regard to a specific development scenario, in this case large scale residential and mixed-use development and is therefore only appropriate when considering development of this kind. The study does not provide recommendations as to whether development would be acceptable in landscape terms.

1. Hankinson Duckett Associates, 2015, *Surrey Landscape Character Assessment: Elmbridge Borough*

Landscape Unit UW6-A

The Landscape Unit falls within the Lower Green to Weston Green and Littleworth Common Landscape Character Area and covers 192ha of wooded common, recreational land uses and the Sandown Park Race Course, within the urban area to the north-east of Esher. The South Western Main Line and A307 pass east-west and the A309 north-south through the Landscape Unit. The boundary of the Landscape Unit closely aligns with the GBBR Local Areas 45, 49, 52, 60, 61, 63, 65, and 66 and encompasses Recommended Sub Areas 29 and 36.

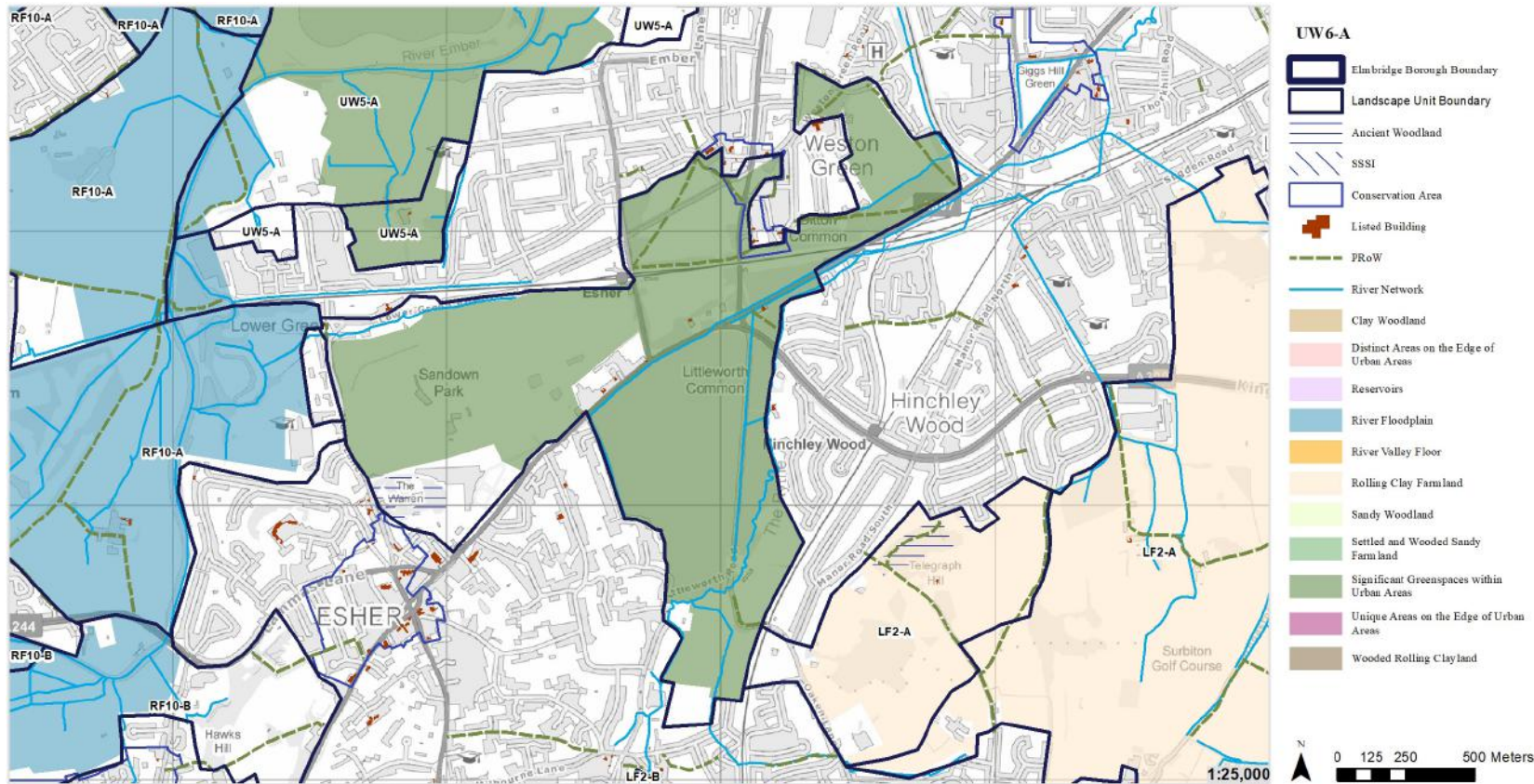


Figure 52: Location plan for Landscape Unit UW6-A

Contains Ordnance Survey data.
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Key Characteristics of UW6-A

The key characteristics outlined below are based on those identified in the Surrey Landscape Character Assessment for the Lower Green to Weston Green and Littleworth Common character area, of which UW6-A is a broadly typical representation.

- A collection of areas which include Sandown Park Racecourse, areas of golf course to the north and south, sports pitches, the wooded Littleworth Common, and other areas of common land to the north-east.
- A number of busy roads converge at a roundabout towards the centre of the Landscape Unit, including the Portsmouth Road (A307) and the Kingston Bypass (A309). The Waterloo to Guildford railway line crosses the northern part of the Landscape Unit.
- Sandown Park Racecourse and adjacent golf course are relatively private, but much of the rest of the area forms a valuable recreational resource, with Open Access Land and public rights of way links in the northern part of the Landscape Unit. Esher railway station is adjacent to the area and connects to public rights of way.
- The Landscape Unit is largely surrounded by the built-up area. This, combined with extensive road infrastructure to the north, and dense woodland to the south, contributes to a strong sense of enclosure, and limits longer views and connection with the wider countryside.
- Significant areas of the Landscape Unit are registered as Common Land, including Littleworth and Ditton Commons, which are also designated as Sites of Nature Conservation Importance. The north-eastern part of the Landscape Unit also includes a small part of the Weston Green Conservation Area, and adjoins

Esher Conservation Area to the south-west. A small patch of ancient woodland is located in the south-eastern corner of the Landscape Unit.

- Parts of Littleworth Common have a sense of remoteness due to dense woodland which screens the surrounding urban areas. However, roads and other urban influences limit tranquillity elsewhere. Overall, the area provides both rural and semi-urban green space as a contrast and relief to the surrounding Built Up Areas.

Landscape Value Indicators

The following are assets and qualities relating to the Landscape Unit that indicate landscape value, as defined in GLVIA3:

- The Landscape Unit displays many of the 'key positive landscape attributes' identified within the 2015 Surrey Landscape Character Assessment. These include:
 - Almost entirely enclosed by urban areas, areas of open landscape provide significant outdoor amenity for the surrounding population.
 - Areas of high biodiversity value and potential, such as the commons.
 - Provide visual and physical break of rural or natural open character within the Built-Up Area.
- Littleworth and Ditton Commons are valued for their ecological interest, due to heathland, acid grassland and secondary woodland habitats, reflected in their designation as Sites of Nature Conservation Importance. These areas of common land are also valued as a recreational resource by local communities.
- The rural character and sense of tranquillity in some

parts of the Landscape Unit, resulting from the generally intact condition of woodland, mature tree field boundaries and the hedgerow network.

- Recreational value of the Public Rights of Way network, which provide access from settlements to local open spaces including woodlands, sports and recreation opportunities and areas of ecological and historic value. Informal footpaths within the woodlands contribute to this recreational offer.

Assessment of Landscape Susceptibility

Table 32 describes the assessment of landscape susceptibility for UW6-A.

Low Susceptibility	Low-Medium Susceptibility	Medium Susceptibility	Medium-High Susceptibility	High Susceptibility
<p>Physical and Natural Character - The Landscape Unit is assessed as having a Medium-High Susceptibility to change in terms of its physical and natural character by virtue of the following: The Landscape Unit displays little intricacy in regard to landform. However, the landscape consists of a varied collection of areas which include Sandown Park Racecourse, wood pasture and parkland associated with Thames Ditton and Esher Golf Course (photo 1), the wooded Littleworth Common, and other areas of common land and sports pitches to the north-east. The golf course and Littleworth Common are designated sites of nature conservation importance which and would be vulnerable to change. The landscape is generally intact, however some areas to the north-east are less so, locally reducing susceptibility in this regard.</p>				
			Medium-High Susceptibility	
<p>Settlement Character and Edge Conditions - The Landscape Unit is assessed as having a Medium-High Susceptibility to change in terms of its settlement character and edge conditions due to the following: Littleworth Common and the mature landscape associated with Thames Ditton and Esher Golf Course strongly contribute to the setting of the settlement edges of Esher and Thames Ditton respectively and are important areas of accessible open land in proximity to urban areas. These landscapes also contribute to the perceived sense of separation from neighbouring settlements and busy road and rail infrastructure passing through the Landscape Unit. Sandown Park in the west is relatively private and enclosed by fencing, and therefore contributes little to the scenic qualities of adjacent settlement edges, however its large scale contributes to the perceived gap between settlements, and acts as a buffer between Esher and the South Western Main Line. Weston Green in the north-east is heavily influenced by adjacent residential properties and while it is an important recreational resource, would be less susceptible to development by virtue of its eroded condition that diminishes its contribution to the setting of settlement in this area.</p>				
			Medium-High Susceptibility	
<p>Cultural and Historic Character - The Landscape Unit is assessed as having a Medium-High Susceptibility to change in terms of its cultural and historic character in light of the following: There are a number of historic assets within the landscape, notably The White Lady Milestone Scheduled Ancient Monument in the centre of the Landscape Unit and a key landmark in the form of The Warren in Sandown Park. Some areas are identified as having High Archaeological Potential within Sandown Park, a number of listed buildings including the Grade II listed gates and railings along Portsmouth Road and the Weston Green Conservation Area (noted that its special character lies within the setting of the village on to the common) that partially falls within the northern extents of the Landscape Unit (photo 2). The cultural and historical associations attached to Sandown Park Race Course, which opened in 1875, further increases susceptibility in this regard.</p>				
			Medium-High Susceptibility	
<p>Perceptual Character and Landscape Experience - The Landscape Unit is assessed as having a Medium Susceptibility to change in terms of perceptual character and landscape experience by virtue of the following: Parts of Littleworth Common have a sense of remoteness due to dense woodland which screens the surrounding urban areas. Roads and other urban influences limit tranquillity elsewhere, however the area provides both open and enclosed green space as a contrast and relief to the surrounding Built Up Areas.</p>				
		Medium Susceptibility		
<p>Visual Character - The Landscape Unit is assessed as having a Medium Susceptibility to change in terms of visual character by virtue of the following: The heavily enclosed landscape of Littleworth Common affords minimal intervisibility with the wider landscape by virtue of its densely wooded character (photo 3). Thames Ditton and Esher Golf Club in the north have a higher degree of intervisibility with views across the golf course and areas of wood-pasture and parkland habitat. However, belts of mature woodland generally screen surrounding development. Sandown Park in the west affords an even greater degree of intervisibility due to its large, open scale and gently sloping landform. Belts of trees along busy roads and the South Western Main Line prevent views between adjacent parts of the Landscape Unit. Strategic view 2 ‘Surrey Hills from Hampton Court’, also identified in the Thames Landscape Strategy, falls within the eastern part of the Landscape Unit, increasing susceptibility in this regard.</p>				
		Medium Susceptibility		
<p>Skyline Character - The Landscape Unit is assessed as having a Medium-High Susceptibility to change in terms of skyline character by virtue of the following: Skylines in the north and south of the Landscape Unit are more susceptible to change in light of their prevailing natural character, formed by either dense woodland canopies overhead or mature belts of woodland in the backdrop of views. Skylines in the west have a lower susceptibility to change due to the presence of development associated with Sandown Park Racecourse which is prominent in skylines in this location (photo 4).</p>				
			Medium-High Susceptibility	

Table 32: Assessment of landscape susceptibility to change from residential and mixed-use development

Photo 1



“wood-pasture and remnant parkland associated with Thames Ditton and Esher Golf Course”

Photo 2



“Weston Green Conservation Area (noted that its special character lies within the setting of the village on to the common) that partially falls within the northern extents of the Landscape Unit”

Photo 3



“The heavily enclosed landscape of Littleworth Common affords minimal intervisibility with the wider landscape by virtue of its densely wooded character”

Photo 4



“Skylines in the west have a lower susceptibility to change by virtue of the presence of development associated with Sandown Park Racecourse which forms a prominent element of the skyline in this location”

Evaluation of Landscape Value

The Landscape Unit is assessed as having **Borough** landscape value due to the following:

- The generally intact condition of the landscape.
- The rural qualities of parts of the Landscape Unit resulting from the maturity of landscape features (Littleworth Common), contributing to a sense of wildness, and providing relief from surrounding Built-Up Areas.
- The Landscape Unit's representativeness of wider landscape character as described in the key characteristics in the Surrey LCA (with the exception of the race-course at Sandown Park).
- The presence of conservation designations including extensive areas of Common Land designated as Sites of Nature Conservation Importance, a small part of the Weston Green Conservation Area and proximity to areas of historic value in adjacent Landscape Units.
- The recreational value attached to the Landscape Unit, supporting a range of sports and recreational uses, serving the wider communities in Elmbridge. The connected Public Right of Way network provides access to valued and historic areas of Common Land.

Evaluation of Landscape Susceptibility

Taking account of the assessment of landscape susceptibility in **Table 32** above, the Landscape Unit is assessed as having an overall landscape susceptibility rating of **Medium-High** to change arising from residential and mixed-use development.

This judgement has been reached due to the historic associations attached to the landscape along with the large extents of woodland and historic common land which would be vulnerable to change. The Landscape Unit also performs an important function in buffering nearby settlements from busy infrastructure. Localised areas in the north-east of the Landscape Unit are less susceptible to change due to the influence modern development already has in the landscape.

Overall Landscape Sensitivity

Taking account of the assessment of landscape value and susceptibility above, the Landscape Unit is assessed as having a **Moderate-High** overall sensitivity to change arising from residential and mixed-use development, by virtue of the historic value attached to areas of the Landscape Unit, the recreational value attached to large areas of common land and open access land and its associated natural character. A high degree of care would be needed in considering the location, design and siting of even small amounts of change within the landscape.

A variation in landscape sensitivity is apparent in the fields to the north-east of the Landscape Unit where the landscape is assessed as having a **Moderate-Low** sensitivity to change arising from residential and mixed-use development, due to the lower value attached to the landscape and existing influence of modern development in this area.

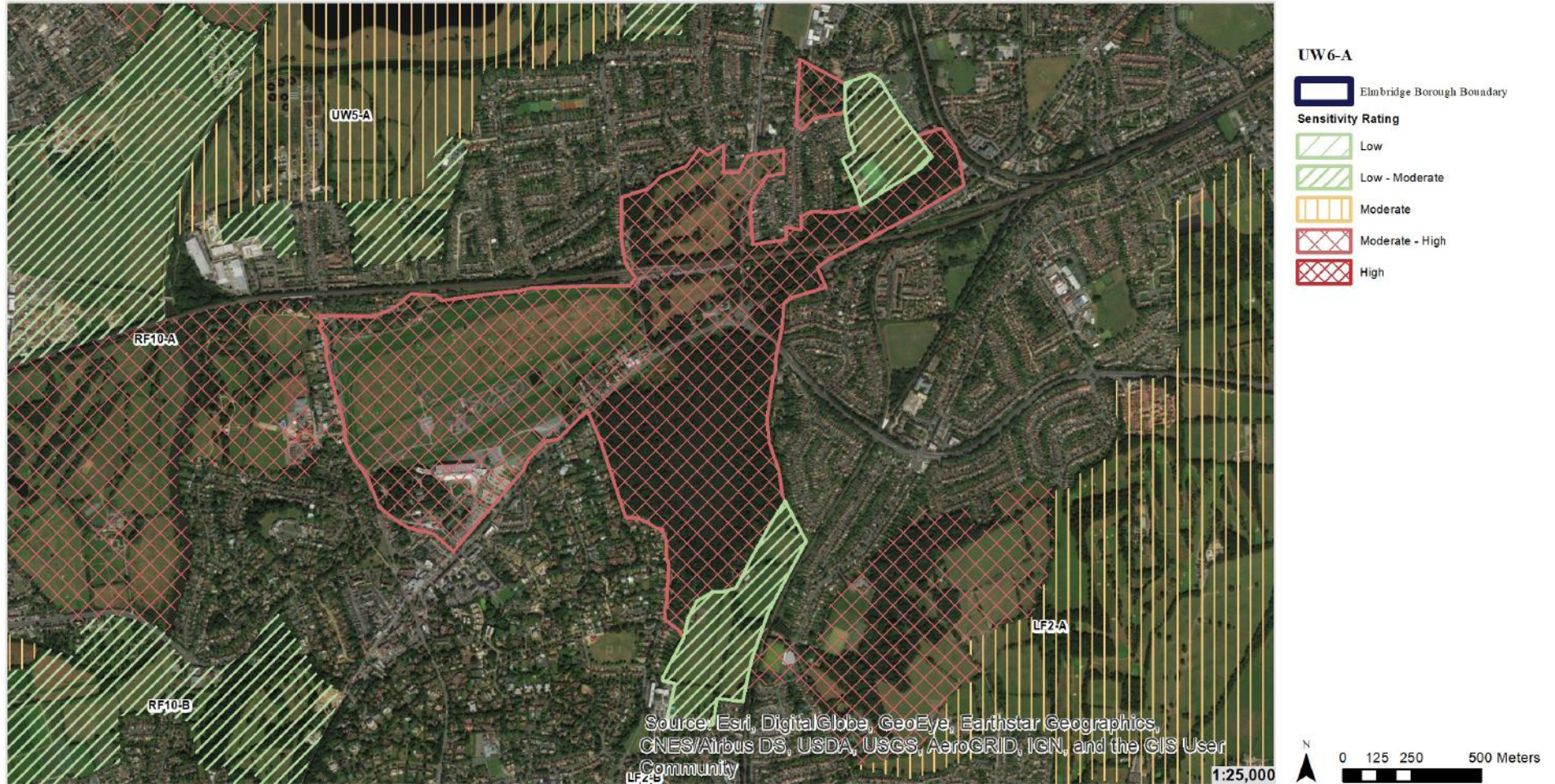


Figure 53: Landscape sensitivity rating for UW6-A

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Appendix BC 8

BC Assessment of Landscape and Visual Effects

Appendix BC 8

BC Assessment of Landscape and Visual Effects

ABC.8.1 As stated within the Officer's Report to Committee at paragraph 9.8.2.39, (with my emphasis) *"The Site is broadly surrounded by urban areas of Esher and enclosed by mature trees and shrubs and therefore its open character can be appreciated only from a very few public viewpoints".* EDP's LTVA identified that notable visual effects for receptors at publicly assessable locations were only recorded in the short-term, largely for receptors on Portsmouth Road and on More Lane. However, in the longer term, these effects were found to be no greater than moderate/minor, being experienced by the roadside pedestrian and user groups.

ABC.8.2 RfR 1 states that the appeal proposals *"would be detrimental to the character and openness of the Green Belt"*. I acknowledge that a degree of change is unavoidably incurred to landscape and townscape character whenever new development is introduced. This is a matter confirmed in the concluding remarks within the Case Officer's Report to Committee (**Core Document CD7.3**) where it states *"It is inevitable that any development proposal would result in a change to the existing built form and landscape and these current proposals are no different"*.

Review of Published Landscape Guidelines/Recommendations

ABC.8.3 The SLCA provides guidance on each of the identified Landscape Types, stating that *"The guidelines indicate the actions required, with reference to the overall landscape objective in order to ensure that distinctive character is maintained."*, and that *"The aim is to set out broad objectives and principles to manage and direct landscape change in order to protect the highest quality and most sensitive landscapes from adverse change and to encourage positive change in weak or degraded landscapes."*

ABC.8.4 The SLCA provides six guidance statements for UW6: Lower Green to Weston Green and Littleworth Common. I analyse each one below in relation to the proposed development.

Conserve and enhance biodiversity value of remnant habitats, and key landscape characteristics that are identified as priority habitats: Enhancing

ABC.8.5 As set out within the SLCA, the majority of the appeal site is defined as urban. However, it has been shown that existing landscape features which contribute to the character of the UW Landscape Type, could be retained and enhance, giving rise to beneficial effects on both townscape and landscape character. Further landscape and ecological enhancements would be considered as part of a future reserved matters application.

Seek opportunities to link existing habitats through habitat restoration: Enhancing

ABC.8.6 As set out within the ecological appraisal that supported the application, the proposed residential sites are predominantly on previously developed land or adjacent to existing developments, and the majority of the habitats to be lost are of negligible ecological

importance and no specific mitigation is required. Whilst the proposed development would be subject to detailed design, the illustrative proposals for the residential areas show that approximately 225 trees are to be planted, being supported by shrub planting where appropriate. As such, the proposed development gives rise to beneficial effects on both landscape character and the landscape fabric of the appeal site.

**Protect and enhance the landscape setting to adjacent settlements and urban areas:
Neutral** (No material harm identified)

- ABC.8.7 As set out within the Officer's Report to Planning Committee (**Core Document CD7.3**), *"The Site is broadly surrounded by urban areas of Esher and enclosed by mature trees and shrubs and therefore its open character can be appreciated only from a very few public viewpoints"*. In the long-term, my view is that there would be no unacceptably adverse effects likely to arise on the Townscape Character and Fabric of the Racecourse. It is accepted that there would be an inevitable change to some views, although such change is very geographically limited and within in a landscape or townscape where change is ongoing. Further, effects of the proposed development on townscape and visual receptors is contained within an area of less than 200m radius from the Racecourse. Beyond 200m, baseline landscape/townscape character and visual amenity are only marginally affected, if at all.
- ABC.8.8 Following the completion of the development proposal, the appreciation of the open character within the Racecourse would be extended to More Lane through the alteration and improvement of the Racecourse's boundary fencing. This beneficial effect would enable both public and private views from the western edge of the Racecourse to well-treed landscapes within the UW6 Landscape Type, thereby affording a greater appreciation of 'rural' features within the urban context.
- ABC.8.9 In addition, well-design access points into development parcels would enable framed views into the Racecourse, giving rise to beneficial effects through the appreciation of open character in views from the immediate urban context.

**Maintain and enhance the network of public access, whilst ensuring significant biodiversity value and resource of these areas is sensitively managed and protected:
Enhancing**

- ABC.8.10 Currently, the Racecourse is a private area which is valued, in a landscape sense, only for its function as a Racecourse and for the recreational uses within it. The illustrative proposals for the proposed development have shown that existing habitats can be retained and enhanced, and new habitat created on-site where possible in line with local planning policy. As such, the proposed development gives rise to beneficial effects on both landscape character and the landscape fabric of the appeal site. At the Reserved Matters stage, a Landscape and Ecological Management Plan for the masterplan site could be submitted, detailing mitigation, compensation and enhancements for habitats and protected species.

ABC.8.11 The appeal proposals enable a greater appreciation of the open character within the Racecourse, as well as improving access to facilities within it through the provision of a family zone in place of the existing go kart track.

**Encourage understanding of the biodiversity and historic elements of the landscape:
Enhancing**

ABC.8.12 I acknowledge that the Elmbridge Borough Landscape Sensitivity Study (**Core Document CD3.25**) states that “There are a number of historic assets within the landscape, notably The White Lady Milestone Scheduled Ancient Monument in the centre of the Landscape Unit and a key landmark in the form of The Warren in Sandown Park. The proposed development retains and enhances the landscape fabric within the external areas of the Racecourse, as well as providing information boards for historic assets on Portsmouth Road.

ABC.8.13 Importantly, with regard to impacts on the Conservation Area, although not a landscape consideration, it is noteworthy that the Council’s SoC states that “*Whilst harm to the character of the area will be clearly demonstrated, the Council does not say that there will be specific, additional harm to the significance of any designated or non-designated heritage assets. The inclusion of policy DM12 in the reason for refusal was an error.*”

Conserve the historic landscapes, such as along the Hogsmill and around Nonsuch Park: Neutral

ABC.8.14 The Racecourse is not defined as an historic landscape.

Summary

ABC.8.15 According to the Council’s own study (**Appendix BC 6**), the UW Landscape Type comprises “*several significant individual green space areas within the county’s Built Up Areas of towns across the county. These areas are entirely within the Built Up Areas of settlements*”. Whilst some areas “*have a sense of remoteness*”, there are areas such as the Racecourse which do not comprise publicly accessible land and are influenced by the surrounding urban areas, within which the majority of the proposed development areas are located.

ABC.8.16 In all cases, proposed development within the appeal site is in accordance with the guidance provided for the UW Landscape Type.

Response to Council’s Statement of Case

ABC.8.17 While it is accepted that there would be some views of the Appeal proposals from the immediate context, as stated within the Council’s SoC at paragraph 6.63, “*being noticeable in itself is not harmful*”. In relation to Landscape and Townscape character, EDP’s LTVA (**Core Document CD5.52**) concludes that following the maturation of the landscape mitigation proposals, there are no elevated adverse effects upon landscape designations or the underlying townscape character or wider landscape character. There

may be some intervisibility experienced by residents adjacent to the Racecourse, but the existing nature of the townscape context, and the use proposed, would be considered to moderate any effect accordingly.

ABC.8.18 Within the areas proposed for development, which are largely within areas defined by the Surrey Landscape Character Assessment (2015) (SLCA) as being urban, there would be minor alteration to some landscape features, including some which may be considered to provide a contribution to tree cover within the UW6 Character Area. However, landscape proposals include the replacement of poorer quality tree stock and the generous enhancement of existing landscape scrub with native and locally typical species, giving rise to beneficial effects.

ABC.8.19 In their conclusion, the Council's SoC states that *"In terms of their impact on the character of the area in general, the developments are unlikely to be harmful..."*, and that *"It is however likely that the sites would be able to accommodate the envisaged quantum of development in a satisfactory manner in terms of their relationship with their respective surrounding areas"*.

Site 1

ABC.8.20 It is noteworthy that, as set out within the Council's SoC, development within Site 1 would not result in *"additional harm to the significance of any designated or non-designated heritage assets"*, despite the contention that *"harm to the character of the area will be clearly demonstrated"*. As illustrated at **Appendix BC 2**, there is little, if any, perception of Site 1 from the public domain. Development within it would be perceived as new development within an urban context, being enclosed by a mature woodland and existing built form within the Esher Conservation Area.

ABC.8.21 As set out within the LTVA (**Core Document CD5.52**), The landscape/townscape effects arising from development within Site 1 would be **minor/negligible**, with effects on public views being no greater than **minor**, being experienced by roadside pedestrians.

Site 3

ABC.8.22 Where the proposed development would be *"at odds with the character of Lower Green Road"*, as contended by within the Council's SoC at paragraph 6.63, the retention of a *"considerable distance between the road and the buildings"* on the northern boundary of Site 3, also accepted within the Council's SoC within the same paragraph, would retain the perceived separation between existing residential built form and the appeal site's use as a Racecourse (essentially being an *"important and dominant use"* as defined by The Design and Character Supplementary Planning Document Companion Guide: Esher (April 2012) (Core Document 3.2).

ABC.8.23 The appreciation of the appeal site from Lower Green Road, owing to the retention of tree planting on the northern boundary of Site 3, would largely be limited to the site access, being experienced by approximately five properties. In this view, new built form would frame views into the Racecourse, oriented towards the existing Grandstand and

affording beneficial effects through the appreciation of open character in views from Lower Green Road.

- ABC.8.24 For receptors passing along More Lane, for the most part the Racecourse and its central core is hidden behind a visual barrier caused by The Warren mound or by paling fencing along the whole length of the More Lane boundary. As part of the development proposals, these views would be opened up by proposed improvements to existing fencing on More Lane and thereby increasing the perceived open character of the Green Belt by opening up views across it.
- ABC.8.25 The Council's Design and Character SPD also states at paragraph 3.43 that "*More Lane to the north does feature a number of flatted developments*", and at paragraph 3.55 that "*due to its proximity to Esher rail station, higher density development maybe appropriate should such opportunities arise*". So, not only would publicly available views of the proposed development be limited, but the scale and location of it would be considered to accord with the commentary provided by the Council's adopted SPD.
- ABC.8.26 As set out within the LTVA (**Core Document CD5.52**), The landscape/townscape effects arising from development within Site 3 would be **moderate/minor**, with effects on public views being no greater than **moderate/minor**, being experienced by roadside pedestrians.

Site 4

- ABC.8.27 Following development within Site 4, as proposed, the functional and recreational enjoyment of pedestrian routes, including the wider network of PRow, and particularly the routes of a higher value which run within Littleworth Common, would be adversely impacted only to a limited degree. Views from Littleworth Common are only possible from the northernmost areas of it, with the existing character of the view being informed by numerous commercial units along Portsmouth Road. While built form within Site 4 may be visible in these views, it is not considered that the appeal proposals would be fundamentally at odds with the varied character of Portsmouth Road. Furthermore, in views from the local road network generally, the perceived character of the proposed development as seen in local views would be similar to that of existing built form within the local context.
- ABC.8.28 As illustrated within the Design and Character Supplementary Panning Document Companion Guide: Esher (**Core Document 3.2**), Site 4 is located in close proximity to a 'Key Gateway'. As such, whilst the proposed development would be subject to detailed design, Site 4 is closely related to a 'gateway' site and a gateway building developed on it announcing arrival at Esher, visible from approaches to the Portsmouth Road junction, would be wholly appropriate.
- ABC.8.29 As set out within the LTVA (Core Document CD5.52), The landscape/townscape effects arising from development within Site 4 would be **moderate/minor**, with effects on public views being no greater than **moderate/minor**, being experienced by PRow users.

Site 5

- ABC.8.30 Site 5 is located on Portsmouth Road which, as stated within the Council's SoC, is influenced by *“other large flatted developments in the area, most notably to the immediate north-east of the site”*. While the appeal proposals would increase the massing of built form within the immediate context, importantly, it would be seen as being similar in its massing to ‘other large flatted developments in the area’, including units to the east on Portsmouth Road. Similarly, proposed development within Site 5 would also be set back from this busy vehicular corridor, benefiting from visual screening provided by both retained and proposed tree cover to the site frontage. Again, the appeal proposals here can only be appreciated in very short-distance views on Portsmouth Road, or in private views from the Racecourse itself.
- ABC.8.31 The proposed access to Site 5, similar to that of Site 3, would enable views from Portsmouth Road to the northern boundary of the Racecourse, giving rise to beneficial effects. This new access would result in the open character of the central areas of the Racecourse being perceived from new locations within the urban context of Esher, namely from Portsmouth Road.
- ABC.8.32 As set out within the LTVA (Core Document CD5.52), The landscape/townscape effects arising from development within Site 5 would be **moderate/minor**, with effects on public views being no greater than **moderate/minor**, being experienced by roadside pedestrians.

Site B

- ABC.8.33 Site B is site adjacent to the existing Racecourse Grandstand. Views of it would be experienced from a very short section of Portsmouth Road, being seen in the context of existing built form within the Racecourse.
- ABC.8.34 As illustrated within the Design and Access Statement (**Core Document 6.49: Figure 72**), the proposed Hotel is set on lower ground to that of the Grandstand which is a minimum of 1 storey taller than the hotel (excluding the roof structure supports which increase the perceived height of the Grandstand further). For receptors travelling west, views of the hotel within Site B would only become available at the entrance to Orchard Place, at the western end of Site 5. Here, the proposed Hotel would be against the backdrop of the Grandstand, it would not block any existing views across the Racecourse and would be partially screened by existing tree cover within the parking areas of the racecourse. For receptors travelling east, the location of the Hotel, being in close proximity to the Grandstand, is such that it would not block any existing framed views from Portsmouth Road looking across the Racecourse.
- ABC.8.35 Overall, the introduction of the Hotel within the Racecourse would increase the perceived massing of built form within the Racecourse from a very short section of Portsmouth Road, without blocking any existing longer views across the Racecourse. In relation to detailed design matters relating to Site B, even though there is no planting shown along Portsmouth Road, it should be the case that planting should be extended along the Portsmouth Road such that it would provide a partial visual screen to the Hotel. This

would continue the existing character of the parking areas adjacent to Portsmouth Road, where specimen tree planting provides some visual softening to built form within the racecourse.

ABC.8.36 As set out within the LTVA (**Core Document CD5.52**), the landscape/townscape effects arising from development within Site B would be **moderate/minor**, with effects on public views being no greater than **moderate/minor**, being experienced by roadside pedestrians.

Overall Summary

ABC.8.37 The long-term impact of the proposal on the local townscape and wider landscape context would be no greater than **moderate/minor**, with both adverse and beneficial elements within the proposals, resulting from a slight and non-fundamental alteration.

ABC.8.38 In combination with the overall moderate/minor effect arising from the appeal proposals, it is the case that any appreciation of new built form would be experienced from a very localised area, essentially from a very short section of Portsmouth Road and from a very short section of More Lane. Overall, views of the appeal proposals would be within an area of less than 200m radius from the Racecourse. Beyond 200m, baseline landscape/townscape character and visual amenity are only marginally affected, if at all.

Appendix BC 9
Response to Third Party Comments

Appendix BC 9 Response to Third Party Comments

The Built Form, Design, Character and Views

“The development of an already over developed area”.

ABC.9.1 The Surrey Landscape Character Assessment (**Core Document CD3.19**) which was published in 2015, defines large areas of Sandown Park Racecourse as being urban, falling outside any of the defined Landscape Character Types. As such, the majority of areas being proposed for development are located within the urban context.

“Site 2 is monstrous”.

ABC.9.2 The Surrey Landscape Character Assessment (**Core Document CD3.19**) which was published in 2015, defines large areas of Sandown Park Racecourse as being urban, falling outside any of the defined Landscape Character Types. Throughout the urban context of Esher are numerous precedents for built form of this scale, including the Council building on Portsmouth Road, the Racecourse Grandstand and Eclipse building.

ABC.9.3 In addition, a number of poor quality leylandii trees are to be removed from the frontage on Portsmouth Road, being replaced with appropriate tree planting to benefit the street scene. In the long-term, views of Site 2 would be considered to be in keeping with the character of the local context, with built form being partially screened by street tree planting.

“The application provides limited information and lack of understanding of local context and contrary to the “Building Better, Building Beautiful Commission” report, seeking to “refuse ugliness”. The design approach is simply wrong as the proposal seeks to clap over scaled, ill considered, additions onto the face of a familiar and well loved local area”.

ABC.9.4 As stated within the ‘Living with Beauty: Promoting health, well-being and sustainable growth’ report of the Building Better, Building Beautiful Commission (January 2020), *“Ugliness means buildings that are unadaptable, unhealthy and unsightly, and which violate the context in which they are placed.”* However, it has been confirmed by Council Officers within their Officer’s Report to Planning Committee (**Core Document CD7.3**) that *“the sites would be able to accommodate the envisaged quantum of development in a satisfactory manner in terms of their relationship with their respective surrounding areas”.*

ABC.9.5 For clarity, the ‘Living with Beauty: Promoting health, well-being and sustainable growth’ report states that an outline planning application *“allows for a decision on the general principles of how a site can be developed. Outline planning permission is granted subject to conditions requiring the subsequent approval of one or more ‘reserved matters’”.* The Officer’s Report to Planning Committee (**Core Document CD7.3**) also

states that, at this Outline stage, *“design (including materials), scale, layout and landscaping details being reserved for a later stage of the planning process”*.

- ABC.9.6 As part of the outline planning application process, EDP’s LTVA (**Core Document CD5.52**) provided a review of the circumstances of the proposed development within a number of parcels within Sandown Racecourse, in order that an assessment can be made on the potential effects on the underlying landscape/townscape and visual resource. It concluded that at this outline application stage, *“following the maturation of the landscape mitigation proposals, there are no anticipated material adverse effects upon landscape designations or the underlying townscape character or wider landscape character, nor any material visual effects upon PRow, roadside pedestrians or visitors to the Racecourse. There may be some intervisibility experienced by residents adjacent to the Racecourse, but the existing nature of the townscape context, and the use proposed, would be considered to moderate any effect accordingly”*.

“Only indicative drawings are submitted. This is not enough to properly assess the impact on the character of the town”.

- ABC.9.7 The planning parameters, in combination with the illustrative material contained within the DAS, allows for a sufficient level of detail of the proposals such as to enable an accurate assessment of the likely environmental effects, necessary mitigation, and shows one possible way in which the proposed quantum of development could be delivered. It is anticipated that the principles of the proposed development will be refined and interpreted at a detailed level as part of future reserved matters applications. However, the key design parameters – the mix of built form and fundamentals of site layout as illustrated – have reached sufficiently fixed form to make meaningful LTVA possible.

- ABC.9.8 As confirmed within the Officer’s Report to Planning Committee (**Core Document CD7.3**), at this Outline stage, *“design (including materials), scale, layout and landscaping details being reserved for a later stage of the planning process”*.

“Loss of views across the racecourse”.

- ABC.9.9 The appeal site as a whole is surprisingly visually well contained, as acknowledged in the Case Officer’s report to Committee, such that there would be very few opportunities for views of the development from the surrounding area. In the majority of cases, viewing opportunities of each of the appeal sites are generally limited to the immediate urban context.

- ABC.9.10 With regard to ‘Key Landmarks and Views’ referenced within the Elmbridge Local Plan Design and Character SPD April 2012, (Policy DM20: Open Space and Views), the SPD states that *“Sandown Racecourse provides impressive long views towards London.”* In all cases, where views towards London are possible, these views would be retained.

“4-6 storeys are inappropriate for Esher”.

ABC.9.11 The Surrey Landscape Character Assessment (**Core Document CD3.19**) which was published in 2015, defines large areas of Sandown Park Racecourse as being urban, falling outside any of the defined Landscape Character Types. Throughout the urban context of Esher are numerous precedents for built form of this scale, including the Council building on Portsmouth Road, the Racecourse Grandstand and Eclipse building.

“The removal/reduction of the tree screen between Lower Green Road and the racecourse perimeter would affect the local character transforming it from rural to suburban”.

ABC.9.12 The Surrey Landscape Character Assessment (**Core Document CD3.19**) which was published in 2015, defines Lower Green Road as Urban. As confirmed within the Officer’s Report to Planning Committee (**Core Document CD7.3**), The area between Lower Green Road and proposed development within Site 3 would used as parking for the future occupiers, with areas of soft landscaped amenity space with shrubs and trees creating a green buffer along the road. Notably, the Officer’s report to Committee states that *“The proposed development would likely take a form of detached buildings with residential accommodation over three floors. This is not considered dissimilar to the already existing built form in the proximity of the site”.*

“The scheme should not be presented in an outline application lacking details”.

ABC.9.13 The planning parameters, in combination with the illustrative material contained within the DAS, allows for a sufficient level of detail of the proposals such as to enable an accurate assessment of the likely environmental effects, necessary mitigation, and shows one possible way in which the proposed quantum of development could be delivered. It is anticipated that the principles of the proposed development will be refined and interpreted at a detailed level as part of future reserved matters applications. However, the key design parameters – the mix of built form and fundamentals of site layout as illustrated – have reached sufficiently fixed form to make meaningful LTVA possible.

ABC.9.14 As confirmed within the Officer’s Report to Planning Committee (**Core Document CD7.3**), at this Outline stage, *“design (including materials), scale, layout and landscaping details being reserved for a later stage of the planning process”.*

“Due to the land level, the proposed development on site 2 would be the equivalent of 5 floors from the road level”.

ABC.9.15 As confirmed within the Officer’s Report to Planning Committee (**Core Document CD7.3**), *“The indicative height at three storeys would be comparable with the adjacent terrace starting with No 2 High Street”.*

“The proposed flatted development is not attractive, and there should be a mixture of luxury apartments and affordable flats”.

ABC.9.16 As confirmed within the Officer’s Report to Planning Committee (**Core Document CD7.3**), at this Outline stage, *“design (including materials), scale, layout and landscaping details being reserved for a later stage of the planning process”*. As such, detailed design considerations are to be considered as part of a future Reserved Matters application.

“The scheme is out of proportion for Esher and its scale is not in keeping with the surrounding area and the character of the area”.

ABC.9.17 The Surrey Landscape Character Assessment (**Core Document CD3.19**) which was published in 2015, defines large areas of Sandown Park Racecourse as being urban, falling outside any of the defined Landscape Character Types. Throughout the urban context of Esher are numerous precedents for built form of this scale, including the Council building on Portsmouth Road, the Racecourse Grandstand and Eclipse building. Further, EDP’s LTVA (**Core Document CD5.52**), which was not challenged by the Council at any point during the application process, concluded that *“The townscape setting of the Racecourse as seen from the urban context of Esher, and the barely perceptible appreciation of it from the wider landscape context, results in any effects arising from the proposed development being very geographically limited”*. Further, that *“The proposals give rise to the potential for beneficial effects on landscape features through the retention, enhancement and addition of trees and hedgerows within the local townscape context”*.

“Skylines will be altered for many”.

ABC.9.18 Despite local topography within the Racecourse suggesting otherwise, namely high ground on The Warren, there is a very limited sense of association between the Racecourse and the wider setting; being divorced both physically and visually from it by mature vegetation, a railway line and large areas of housing. This point is confirmed within the Officer’s Report to Planning Committee (**Core Document CD7.3**), which states that *“The Site is broadly surrounded by urban areas of Esher and enclosed by mature trees and shrubs and therefore its open character can be appreciated only from a very few public viewpoints”*.

ABC.9.19 EDP’s Landscape/Townscape and Visual Appraisal (**Core Document CD5.52**) found that notable effects of the proposed development on townscape and visual receptors is contained within an area of less than 200m radius from the Racecourse. Beyond 200m, baseline landscape/townscape character and visual amenity are only marginally affected, if at all.

Trees

“The removal of trees (TPO) on the nursery relocation site would be illegal”.

ABC.9.20 As set out within the application documentation, a review of the Council’s online interactive map (accessed 02 January 2018) found that Tree Preservation Orders (TPO) are administered to trees on and / or adjacent to Site 1 and Site A only.

“Loss of trees (some of which have TPOs)”.

ABC.9.21 As set out within the application documentation, a review of the Council’s online interactive map (accessed 2nd January 2018) found that Tree Preservation Orders (TPO) are administered to trees on and / or adjacent to Site 1 and Site A only. Further, as confirmed within the Officer’s Report to Planning Committee (**Core Document CD7.3**), *“The Council’s Senior Tree Officer visited the Site and considered the development proposals in the light of their impact on the existing trees, including the protected and veteran trees, and the ancient woodland on all individual development sites”*. With the exception of Sites 1 and A, which would be the subject of detailed consideration as part of a Reserved Matters application, in all cases the Officer raised no arboricultural concerns.

“Replacement trees will take 20 years to mature”.

ABC.9.22 EDP’s Landscape/Townscape and Visual Appraisal (**Core Document CD5.52**) considered the likely effects on townscape character and visual amenity in accordance with published guidance, namely the *Guidelines for Landscape and Visual Impact Assessment – Third Edition* (LI/IEMA, 2013) (GLVIA3). Within the appraisal, a 15-year time horizon is used as the basis for conclusions about the residual levels of effect. 15 years is a well-established and accepted compromise between assessing the shorter-term effects (which may often be rather ‘raw’ before any proposed mitigation has had time to take effect) and an excessively long-time period.

Amenity

“Overlooking and loss of privacy for those living near the racecourse”.

ABC.9.23 As confirmed within the Officer’s Report to Planning Committee (**Core Document CD7.3**), *“On the basis of the submitted illustrative plans, it is likely that the proposed development has the potential to address any concerns with regards to the amenities of the existing neighbouring or the future occupiers of the development. As the proposals are in their majority in the outline form, detailed plans would be assessed at a later stage within their respective future application/s.”*

“Impact of the development on site 2 on existing residential property at 2A Warren Close due to its proximity and the height of the development, in terms of the loss of light, overshadowing, the loss of privacy”.

ABC.9.24 As confirmed within the Officer’s Report to Planning Committee (**Core Document CD7.3**), *“The indicative height at three storeys would be comparable with the adjacent terrace starting with No 2 High Street”*. However, as confirmed within the Officer’s Report to Planning Committee (**Core Document CD7.3**), as part of a future Reserved Matters application, *“it is likely that the proposal could be designed as not to result in any adverse loss of light to the existing neighbouring occupiers”*.

Appendix BC 10

Email Correspondence with Esher Borough Council Plans

Ben Connolley

From: Ben Connolley <benc@edp-uk.co.uk>
Sent: 03 December 2018 09:26
To: Clare Smith
Subject: Sandown Racecourse: LVA

Good morning Clare,

Following on from our meeting on Thursday, I wanted to plan some time with you to go through the viewpoint locations for the landscape and visual appraisal at Sandown.

During my recent visit, a view was recorded from outside the gates of the Racecourse on Portsmouth Road – as below. It would be useful to get your thoughts on the location of this view, and whether you would agree that this represents the current context of Portsmouth Road?



With regards to the clarity of views (regarding the weather), am I correct in understanding that your main concern is those views which look towards London, beyond the site context?

Would you have some time today or tomorrow to run through the landscape and visual scope?

Kind regards,

Ben

Ben Connolley BSc (Hons), PGDipLA, CMLI
Principal Landscape Architect



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