

Sandown Park Racecourse, Esher
Appeal Reference: APP/K3605/W/20/3249790
Summary Statement in respect of Heritage Matters
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JCR/8

1. Introduction

- 1.1 This Summary Statement in respect of Heritage Matters has been prepared in relation to the appeal against the decision of Elmbridge Borough Council to refuse a hybrid planning permission (LPA Ref 2019/0551) for redevelopment proposals at Sandown Racecourse.
- 1.2 This Statement has been prepared by Eddy Stratford, BA (Hons), MCIfA, an Associate and senior member of the Archaeology and Heritage Team at EDP, an independent multi-disciplinary environmental consultancy based in Cirencester, Shrewsbury, Cardiff and Cheltenham. Eddy has over 18 years of continuous experience in practice as a heritage professional and his portfolio of project involvements includes the investigation and assessment of standing buildings and historic landscapes, as well as the assessment, evaluation and recording of archaeological sites on a wide range of development schemes, ranging in scale and complexity from Nationally Significant Infrastructure Projects and major urban expansions to small-scale schemes for private clients.
- 1.3 This statement outlines matters of relevance to the historic environment; i.e. archaeology and heritage; for the benefit of the inquiry.
- 1.4 It begins by summarising the Appellant's position in respect of historic environment matters (which is set out in detail in the Appellant's Statement of Case), before addressing the comments of relevance in the Council's Statement of Case and any public and third party comments of relevance.

2. The Appellant's Position

- 2.1 The Appellant's position in respect of historic environment matters (which is set out in detail in the Appellant's Statement of Case) is addressed in terms of the effects on designated and non-designated heritage assets.
- 2.2 The Appellant's Statement of Case concludes that there would be no adverse effects (i.e. no harm) on the significance of any designated heritage assets, either through physical change to their fabric or change within their setting and instead there would be benefits to a number of such heritage assets.



- 2.3 The listed buildings of relevance (and which would all remain unharmed by the appeal proposals) are all Grade II listed. They include the Gates and Railings to Sandown Park Racecourse, Traveller's Rest 'folly', a Post by the Tollhouse, Myrtle Cottages, Sandown House and the White Lady Milestone (also a scheduled monument), all located on the Portsmouth Road, in addition to a group of listed dwellings on More Lane to the south-west.
- 2.4 The benefits to designated heritage assets that would result from the implementation of the appeal proposals include a minor enhancement to the access to Site 1 within the Esher Conservation Area and enhancement to the setting of the Grade II listed Traveller's Rest folly. Further enhancements are proposed within the setting of the Grade II listed gates to the racecourse, including measures for traffic control. Provision is also made in the appeal proposals for interpretation boards to enhance the public appreciation of the racecourse and its heritage interest.
- 2.5 In terms of non-designated heritage assets, it is considered that there will be no adverse effects on locally listed buildings. The Appellant's assessment concludes that the implementation of the proposals would result in no adverse impacts on the locally listed Tollhouse within Site 5, or the locally listed buildings, including lodges, in the wider environs of Site 3.
- 2.6 It is the Appellant's position that potential impacts on any archaeological remains that survive within any of the proposed development sites within the appeal site, could be adequately identified and mitigated by a suitable programme of archaeological investigation and recording secured as a condition attached to planning permission.
- 2.7 Therefore, it is the Appellant's case that the appeal proposals fully accord with the policy of the Development Plan (Core Documents **CD1.1** and **CD1.2**), with respect to designated and non-designated heritage assets.

3. The Council's Position

- 3.1 As set out in the Appellant's Statement of Case, the appeal proposals were comprehensively analysed by relevant consultees, including the Council's conservation officer and archaeological officer, and robustly considered in the Officer's Report to Planning Committee (Core Document **CD7.3**). No reasons for objection or refusal were identified by Council officers on the basis of the appeal proposal's effects on the historic environment.
- 3.2 The Officer's Report (Core Document **CD7.3**) acknowledges that the implementation of the appeal proposals would result in limited beneficial effects to two listed buildings and that the Council's heritage experts and planning officer concurred with the Appellant that the appeal proposals do not conflict with the historic environment policies of the Elmbridge Local Plan or national policy, and that there are no historic environment grounds to either object to or refuse the application.



3.3 Accordingly, the Council's Statement of Case makes clear that they do not advance any evidence on heritage matters and that the effects of the appeal proposals on heritage assets are not a matter of dispute at the inquiry.

3.4 The Council confirm in their Statement of Case that the implementation of the appeal proposals would not result in any contravention of relevant heritage policy and clarify at paragraph 6.66 that the inclusion of reference to policy DM12 (which addresses Heritage) in the reason for refusal was an error:

"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."

3.5 This is further confirmed in the signed SoCG between the Appellant and the Council, dated 17 June 2020, where the compliance of the appeal proposals with relevant historic environment policy is confirmed. The 'Impact on Heritage Assets' is specifically identified as part of the 'Matters Not in Dispute' and the following is agreed:

"The proposed developments at Sites A, B, C, D, E1 and E2 are not in principle considered to have a harmful impact on the surrounding heritage assets. In addition:

- *Site 1 – the proposed access, subject of the full element of the application, would preserve the character of the adjoining conservation area.*
- *Site 3 – providing an acceptable design is proposed and the depth and height of the existing vegetation is retained, it is considered likely that the proposals would have a minimal impact on the setting of the locally listed buildings.*
- *Site 5 – the retention of the tollhouse is welcomed."*

4. Third Party and Public Comments

4.1 The third party and public comments and objections in respect of the planning application and appeal of relevance to heritage matters focus on the following issues:

1. General perceived impacts on the historic environment;
2. The identification that the proposals contravene policies DM12 and DM2;
3. Impacts on the Esher Green Conservation Area; and
4. Impacts on a Locally Listed Building (Horseshoe Nursery – a former Tollhouse).



- 4.2 In respect of points 1 and 2 above, and as set out in the preceding sections, due assessment of the effects of the proposals on the historic environment has been undertaken by the Appellant to inform the planning application. This included consideration of all listed buildings, scheduled monuments, conservation areas and locally listed buildings, as well as other non-designated heritage assets in the appeal site's environs. It is concluded that the appeal proposals would not result in harm to any heritage assets (either designated or non-designated) nor contravene historic environment policy of the Development Plan. The impacts identified equate to minor enhancements to a number of designated heritage assets, as set out in the paragraphs above.
- 4.3 The proposals were analysed by statutory and non-statutory consultees who similarly identified no harm to these assets and found no reason for objection on the basis of the appeal proposal's effects on the historic environment. The Council found that the appeal proposals fully accord with relevant historic environment policy of the Development Plan. It is therefore concluded that points 1 and 2 of the public and third party concerns, as set out above, have been adequately addressed in the planning submission.
- 4.4 In terms of point 3, and the impacts on Esher Green Conservation Area, it is reiterated that the conclusion of the Appellant's assessment is that the proposals would preserve and enhance the conservation area. The Council has also confirmed that the development proposals would preserve the character of the conservation area.
- 4.5 In respect of point 4; the impact on the Locally Listed former Tollhouse; the Appellant's assessments concluded that this building would not be harmed by the implementation of the appeal proposals. The Council have welcomed the retention of the Tollhouse and not identified any harm to its significance through the implementation of the appeal proposals.

5. Conclusion

- 5.1 Therefore, all issues raised in third party and public responses in respect of the historic environment have been appropriately dealt with, and the position remains that the implementation of the appeal proposals would not result in any contravention of relevant heritage policy, and would result overall in a positive enhancement to the historic environment.