

SPAG/SoC/July 2020

APPEAL by JOCKEY CLUB RACECOURSES LTD  
PINS REFERENCE : APP/K3605/W/20/3249790

Against the Refusal of Planning for Application 2019/0551  
By ELMBRIDGE BOROUGH COUNCIL

For proposals at SANDOWN PARK RACECOURSE  
PORTSMOUTH ROAD, ESHER, SURREY KT10.

### **STATEMENT OF CASE by SANDOWN PARK APPEAL GROUP**

In its role as a Rule 6 Party representing the views of Residents surrounding the Appeal Site.

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#### **1: INTRODUCTION**

- 1.1 : In very simple terms, as with other racecourses in their ownership, the Jockey Club have sought to achieve development in order to provide the finance for capital investment in their business.
- 1.2 : At their Sandown Park venue, where other parallel revenue streams in the exhibition and events world now outnumber the 25 race meetings each year, horse racing has become one facet of an all-year-round business operation.
- 1.3 : It is perhaps no surprise that a planning application has come forward that reflects an option to balance the Company's accounts at Sandown Park. It appears to have little regard for either the context or the environment it seeks to develop. Indeed, the elements of the development appear to have been stapled to the balance sheet without regard to their implications and shuffled in the 'indicative only' paperwork of an Outline Application.

1.4 : The reality of this approach has resulted in an abomination of expedient development proposals that have become detached from their Planning Policy context by the financial argument to support a business plan.

## **2: OVERVIEW OF THE APPEAL GROUP'S POSITION**

2.1 :The Group contends that the absence of any visual impact studies of the Jockey Club's proposals has too easily allowed mitigating arguments in their favour, to hold sway.

2.2 : Therefore, as a complimentary contribution to the landscape appraisal of the Council's defence, the Group offers a graphic and photographic portrayal of the main proposed elements and contexts of the application. They will hope to inform both the architectural and highway impacts, which have, to date, despite the masterplan 'Vision' billing by the Jockey Club, remained elusive.

2.3 : Notwithstanding the physical realities of the Jockey Club's intentions, the Group remains seriously concerned that a business plan to fund enhancements to private facilities threatens to provide compelling evidence of 'very special circumstances' sufficient to overturn almost incredulous harm to the Green Belt and as such should be rigorously challenged.

2.4 : Finally, the Group contends that that there can be no common ground established which relies upon the assumptions made by the Jockey Club in pre-decision discussions and that all elements stand or fall .

## **3: GRAPHIC EXPLORATION OF THE VISUAL IMPACT OF THE PROPOSALS**

3.1 : The Group will provide expert witness and accompanying graphic visualisations of the main elements of the Jockey Club's proposals to confirm that by excluding consideration of appearance, landscaping, layout and scale, the outline planning application avoided issues that, had they been revealed at the time, would have clearly demonstrated the banality of the desk-top planning exercise.

## **4: PHOTOGRAPHIC EXPLORATION OF THE IMMEDIATE HIGHWAY NETWORK**

4.1 : The Group will provide local photographic reconstructions and commentary to all routes emanating from the various Appeal site access points to demonstrate the catastrophic impact the proposals will have on surrounding road configurations, already compromised by both congestion and bottlenecks. These will graphically portray the reality of the existing situation prior to the any further pressures imposed by the proposals which have been

euphemistically described as containing mitigation available to limit the impact on the Highway network, alternatively known as the exclusion of the motor car from all calculations.

## **5: QUESTIONABLE USE OF THE GREEN BELT**

5.1 : The Group will provide witness evidence to question the premise by the Jockey Club that a poor bank balance and poor housekeeping were sufficient to justify the 'very special circumstances' required to negate strategic Green Belt designation. Furthermore, the Group will question whether, in light of the Jockey Club's derogatory 'surplus to requirements' desk-top analysis, there was any anticipation or indeed presumption, that any forthcoming unilateral exclusion of Green Belt designation will find support beyond the local context.

## **6: CONCLUSION TO A COMPREHENSIVE DISMISSAL**

6.1: The Group will generally seek to provide missing evidence that goes beyond the remit of the Local Council, to demonstrate the shortfalls in understanding that are inherent in a complex outline planning application on Green Belt that are clearly open to exploitation.

Sandown Park Appeal Group     JULY 2020