

SPAG/PoE/OCT'2020

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

SANDOWN PARK APPEAL GROUP

Proofs of Evidence

1:0 Witness : PETER WHICHELOE RIBA : Local Chartered Architect

SCOPE OF EVIDENCE:

Graphic exploration of the visual impact of the proposals.

1:1 PW will reference his evidence to support REASON:2 of the 2019/0551 Refusal Notice which asserts 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'.

1:2 It will be suggested that from a planning application standpoint, there is a certain recklessness in a proposal for clearly considerable inappropriate development in prime Green Belt which avoids the material considerations of openness and visual impact.

The format of an outline application, with scale, layout, appearance and landscaping all reserved for later consideration, removes this crucial information from the decision-making process.

As an architect, I have attempted to redress this omission and inform the Inspector and the Inquiry of the stark realities that may await a local environment seemingly protected from such devastation.

1:3 Presently it is envisaged that four out of the six main sites will be portrayed:

SITE: 3 which has access on to Lower Green Road and consists of nine three storey blocks of apartments totalling some 310 metres in overall length.

SITE:4 which is accessed from Station Road and consists of a block of apartments 90 metres in length, over half of which is six storeys in height with the remainder at four and five storeys having a physical presence from th Portsmouth Road and the north-easterly entrance to Esher.

SITE:5 which is accessed from the Portsmouth Road and consists of four four-storey apartment blocks 128 metres in overall length just before entering Esher.

SITE: B which consists of a six-storey plus mezzanine 150 bed hotel, some 70 metres in length, effectively extending the existing grandstand to the east with access on to undisclosed points along the Portsmouth Road.

1:4 Together with Sites 1 and 2, each of these 'developments' have a similar characteristic in common in that they create, in some instances, monstrously, extensive unbroken perimeter walls of built accommodation which are not only anathema to the openness of the Green Belt they effectively enclose, but highly alien edifices that disrespect the context of the existing environment and communities they abut.

1:5 It may be helpful to the Inspector to have an understanding of the methods used to produce the images portrayed which are all drafted by hand.

They are initially designated on a block plan to establish viable viewpoints and verified in the field where a linked series of photographs are taken of the panorama, minimising distortion.

The assembled series of prints forms the backdrop- often creating A0 size boards- and the montage can be commenced.

I am grateful to Rapleys for their recent OS updated location plan which is crucial to identifying features that appear in the panoramas with those on the mapping.

With a viewpoint accurately confirmed on the plan the proposal can be plotted with careful reference to heights taken in the field to complete the three-dimensional grid in perspective into which the proposal can be drawn.

1:6 As the Inquiry is likely to be virtual a typical product in this series is attached here to indicate its scale which will also be accompanied by the relevant section of ordnance.

A view of SITE 4 together with an early version of the overall viewpoints is attached.

2:0 Witness HUW THOMAS MRICS Chartered Local Building Surveyor

SCOPE OF EVIDENCE

Photographic exploration of the existing immediate Highway Network.

2:1 HT will reference his evidence to support REASON :1 of the 2019/0551 Refusal Notice which asserts that collateral damage would cause 'other harm, including impact on transport [highway network]

2:2 HT will provide local observations in an assessment of existing local conditions that demonstrate the limitations posed by the physical road configurations surrounding the Appeal site.

2:3 It will be depicted through sequential photographs and local knowledge how the existing network ,already compromised by both congestion and bottlenecks, is, in reality ,far from the 'sustainable' interchange that has been purported and how Esher and the Appeal site often remain gridlocked by the shackles of its historical focus of routes.

2:4 The presentation will trace existing routes emanating to and from the Appeal site in photographic sequence, demonstrating the dangers of further irreparable harm likely to be inflicted by the significant additional pressures that will inevitably ensue by the imposition of the proposals traffic.

3:0 Witness: Professor ROB IMRIE Visiting Professor of Sociology

SCOPE OF EVIDENCE

Questions the nature of 'very special circumstances' put forward by the Jockey Club and whether they should be demonstrably 'material considerations'

3.1 RI will reference his evidence very simply to support REASON:1 of the 2019/0551 Refusal Notice which asserts that 'the very special circumstances required to clearly outweigh the harm to the Green Belt have not been demonstrated in this case'.

3:2 RI will argue that there is a question mark over Rapleys' case for the Jockey Club that 'any major capital improvements must pay for themselves', insinuating that a planning permission is needed as a revenue generating mechanism and by implication does this make it a material consideration.