

**Appendices to Rebuttal Proof of Evidence of William Gittus on  
Behalf of Appellant**

**Appeal By Jockey Club Racecourses Limited for Development of  
Sandown Park Racecourse**

**PINS Appeal Ref: APP/K3605/W/20/3249790**

**Appendix R1** E-mail from Gordon Balharrie (Leslie Clark) to William Gittus,  
dated 5 November 2020

**Appendix R2** E-mail from Georgina Liggins (Accor) to William Gittus, dated 4  
November 2020

**Appendix R1**

E-mail from Gordon Balharrie (Leslie Clark) to William Gittus, dated 5 November 2020

**From:** [Gordon Balharrie](#)  
**To:** [Gittus, William](#)  
**Subject:** Sandown Park Racecourse  
**Attachments:** [image001.png](#)

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William

You have asked me to set out my experience working with Jockey Club Grandstand refurbishments and for an explanation of the way in which I have compiled my estimates for the Sandown Park project. These, including Martin Warren's comments (of MWA, the Council's expert consultant), are contained in CD 6.63.

I am a partner of Leslie Clark Construction Consultants based in Holborn, London WC2. I have been in the professional field of quantity surveying since finishing University with a BSc degree in 1986, joining Leslie Clark in 1987 and rejoining as partner in 2010. I qualified as a member of RICS in 1988 and am a Chartered Quantity Surveyor. I specialise in commercial, industrial, retail and leisure developments and have particular expertise in racecourse development and refurbishments.

As you know I have been working with The Jockey Club for 14 years (to date) on the refurbishment and redevelopment of many of its racecourses. In that time I have become very familiar with virtually every one of its 15 racecourses over time, including Sandown Park which I have visited on numerous occasions in connection with the current appeal scheme proposals. More recently in 2018/19 we have worked on various proposals at Sandown including refurbishment of the grandstand and of the Bendigo and Grandstand View Suites. Within that time I have compiled cost estimates and cost plans for numerous projects at Sandown and other racecourses, including refurbishing existing grandstands and upgrading and redevelopment of racing facilities.

The estimates produced for the masterplan redevelopment at Sandown have been based on measured drawings of the new and existing buildings and have been built up using a schedule of rates which have been based on true costs of refurbishment works and redevelopment works from other completed projects such as at Epsom, Cheltenham and the Sandown Bendigo bar refurbishment. These are in our opinion wholly appropriate at this feasibility stage estimate of a project, and it is standard practice within the industry to prepare estimates in this way at this stage, as agreed with MWA. The costs included within this masterplan Order of Cost Estimate are our assessment of the proposed works that would need to be undertaken but are, in our view, the minimum that would need to be spent to achieve the standard of finish undertaken at The Jockey Club's other racecourses and at other non-Jockey Club racecourses such as York, Lingfield and Ascot.

I have only included costs that we consider essential, based on discussions with JCR personnel, site visits and the structural surveyors' reports. These works and costs have been discussed in detail and agreed with MWA. Only minor allowances have been made for structural alterations to the existing roof, terrace slabs and columns of the main grandstand to help prevent water ingress from affecting hospitality areas within the grandstand. This should be sufficient at this stage, but additional ongoing maintenance and repair work will be required over time. The structural allowances would help to ensure that the lifespan of the grandstand could after refurbishment and with ongoing repairs and maintenance continue for at least another 20 years. A 20-year time horizon is standard industry practice based on a full building survey not finding major structural defects, as here.

Leslie Clark and MWA have also agreed the costs of works required to other areas of the racecourse including new stables, new stable staff hostel, the family enclosure, car parking areas, track improvement works and other works listed and set out in the agreed Order of Cost

Estimate Schedules (CD 6.63). The total cost estimate is £35,792,503.65, or approximately £36m, excluding VAT. I am confident of the accuracy of this estimate to be the minimum cost to carry out the estimated works.

No allowance has been included within the agreed total £35.79m Order of Cost Estimate for works to the Eclipse Building, a cost of over £3.5m, but this is included in the agreed Schedule as the costings had been carried out anyway. Those works would have to be carried out from other funds. I understand that this would be from revenue receipts generated from the newly refurbished facilities. The same is true for replacement of all roof plant, annual and continued maintenance of the existing facilities, any alterations to the horsewalk or other forms of upgrading of the current facilities at Sandown or for new, additional facilities. It is my understanding that these additional works and costs would also have to be funded from revenue generated from the newly refurbished facilities.

Based on the survey work undertaken by building surveyors and my experience of such matters as a quantity surveyor visiting Sandown over an extensive period, all the refurbishment and interventions being proposed to refurbish or replace the racecourse buildings are necessary, otherwise the facility will continue to deteriorate and potentially become unusable. In any event, the cost of carrying out the refurbishment works will increase over time as the building deteriorates.

You have asked me to comment on the effect on costs, assuming the proposed redevelopment and refurbishment works were to be carried out in phases, and that funds would become available over time, as suggested by others I understand. It is for the Jockey Club to conclude whether it would be efficient or sensible in practice to phase all these works to the racecourse over time from an operational point of view, but it would certainly not be cost effective. It would cost significantly more to carry out the works in phases. Once stripping out of an area has been carried out, the area would need to be refurbished in any event before customers would be able to use it. The additional cost to do this is significantly less if in one single contract than if carried out with multiple stops and starts in multiple phases over a number of years. I estimate that this could add at least 10% to 15% additional cost, and even more, depending on the number of phases and the interim work required.

The larger the area refurbished in one contract in a single or two phases over two seasons, say, the greater the cost benefits and other benefits of scale are. In addition, if one takes into account the extent of works and saving of time to complete the work, it makes no sense at all to carry out a major upgrading and refurbishment contract such as is required at Sandown in multiple phases. The stables and hostel are to be replaced and the car parks areas near the main entrance upgraded, causing disruption to all these areas. Almost all of the grandstand requires substantial refurbishment, not just part. This includes the Esher and Surrey Halls as well as the Solario, Sandown View, second floor boxes and adjacent areas, and other areas set out in the Order of Cost Estimate Schedules. These require a complete overhaul including refurbishment of all floor, wall and ceiling finishes, services, plumbing, lifts, catering, alarms, FF&E, CCTV, BMS and M&E plant etc.

The recent refurbishment works carried out in 2019 were merely a stopgap and water penetration has again caused damage since then requiring additional works to be undertaken. Repairs and repainting works including to cover up water penetration and leaking pipes are almost continuous.

I understand that these comments will be placed before the inspector at the public inquiry. I can state that the above information is true.

Should you have any further queries or require further information please do not hesitate to contact me.

Kind regards

Gordon

**Gordon Balharrie BSc MRICS**

Partner

**Leslie Clark**

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**Appendix R2**

E-mail from Georgina Liggins (Accor) to William Gittus, dated 4 November 2020

**From:** [LIGGINS Georgina](#)  
**To:** [Gittus, William](#)  
**Subject:** RE: Sandown Park Racecourse - proposed hotel - Accor  
**Date:** 04 November 2020 13:57:41  
**Attachments:** [image002.png](#)  
[Accor Letter of Interest - Sandown Park Racecourse.pdf](#)

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Dear William,

By way of background, prior to being appointed Development Manager for Accor in January 2020 I was, as you know, Associate in the Hotels team at Savills. During my employment at Savills I was involved in advisory work for the proposed new hotel at Sandown Park Racecourse and thus am very familiar with the Sandown site and JCR's planning proposals.

The proposed new hotel is for a high-quality midscale/upscale (ie. upper 3\*/4\*) hotel. I anticipate such positioning would be attractive for the local area and visitors to the racecourse whether for leisure or business, particularly where Esher has direct rail connections to London Waterloo. For a hotel in this location we would require circa 150 bedrooms to achieve economies of scale through the hotel operations. Bedroom sizes for a Novotel (one of our midscale/upscale brands) are approximately 20-25 sq m NIA. We would require a food and beverage offering (note that only our budget brands do not require dedicated a F&B amenity). The F&B provision here would attract hotel guests and local residents, being located within a short walking distance to the town centre, and thus look to complement existing F&B offerings in the town.

The proposed new hotel is to be located within the racecourse grounds. The positioning of the hotel adjacent to the grandstand is important to enable the hotel integrate into the racecourse offering (sporting events, conferencing space and hospitality areas), contributing to the place-making of Sandown Park Racecourse within Esher and Surrey. Guests will expect views over the racecourse with this positioning, enhancing the appeal of staying in a 'racecourse' hotel. This situation will also allow the hotel to benefit from excellent access to Esher Town Centre, providing a link for hotel guests and visitors to the town alike to move between the racecourse and town centre easily.

We have discussed the previously consented site of the Sandown Lodge and its car park. Accor would only be interested in a budget hotel offering for this site, which I understand is not in line with the place-making ambitions of Sandown Park Racecourse. One of the key aspects of a hotel located next to the grandstand would be the view of the racecourse, which Sandown Lodge would not be able to offer to guests.

Despite the difficulties that the ongoing pandemic is bringing to hospitality, the Development Team at Accor has been busy throughout 2020. We have been working on a number of projects looking to open in 2023/24, evidencing the faith in the industry that demand will return to previously strong levels. Accordingly, I attach here a letter of interest from Accor for the proposed new hotel at Sandown Park Racecourse.

Please do keep me informed on the planning application and appeal, and I look forward to progressing our interest in the opportunity further with you in the event that planning permission is granted. I have no objection to this email being placed before the inspector and public inquiry.

Kind regards,  
Georgina



**Georgina Liggins**

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William Gittus  
Group Property Director  
The Jockey Club  
75 High Holborn  
London WC1V 6LS

4 November 2020

**Letter of Interest – Sandown Park Racecourse, Esher**

Dear William,

Further to our recent discussions, Accor HotelServices UK Limited (referred to herein as “Accor”) notes our interest in the proposed hotel development at the site of Sandown Park Racecourse, Esher (referred to herein as the “Opportunity”).

Our potential interest in the Opportunity would be under a management agreement or a franchise agreement. We consider the appropriate brand for the Opportunity would be a Novotel. Our initial thoughts set out here are subject to further due diligence.

Accor is one of the world’s leading hotel operators and benefits from 39 hospitality brands across 4,900 hotels. With over 50 years’ experience and a focus on the latest technologies and innovative tools, Accor is one of the fastest growing hotel brands in the UK and globally.

It should be noted that this letter is only an expression of our interest in the Opportunity. The letter does not create a legally binding obligation on Accor or any of its affiliates. You should not rely on this letter, or any further discussions associated with the Opportunity, as an agreement, offer or commitment by Accor or any of its affiliates to enter into any transaction with respect to the Opportunity. Our interest in the Opportunity is subject to approval by appropriate committees and authorised representatives by you or Accor.

Please do not hesitate to contact me with any additional queries and I look forward to discussing this further.

Yours faithfully,

Georgina Liggins  
Development Manager  
Accor HotelServices UK Limited