

Sandown Park Racecourse, Esher – APP/K3605/W/20/3249790
Rebuttal of Evidence: David Webster
JCR3/4: edp5237_r014b

1. Introduction

- 1.1 My name is Ben Connolley. 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.
- 1.2 This Rebuttal Proof of Evidence has been prepared in response to the evidence of David Webster (DW) of Huskisson Brown Associates (Proof of Evidence: Openness, Landscape / Townscape & Visual Effects).
- 1.3 Given the volume of information submitted by DW, this document is not intended to address every point raised on behalf of Elmbridge Borough Council (EBC), nor circumvent the requirement to consider these further during the Inquiry; it has been produced to address new points relating to landscape/townscape value and the assessment of effects which, in my view, benefit from clarification in writing prior to the opening of the Inquiry.

2. General Points

- 2.1 The Council's case with regard to Landscape and Visual matters is set out at Paragraphs 6.43 and 6.58 to 6.66 of their Statement of Case (SoC). However, DW's Proof goes beyond the scope set out within the SoC.
- 2.2 EDP's Landscape/Townscape and Visual Appraisal (LTVA) was submitted to the Council as part of a pre-application submission. This is the first time that the submitted LTVA has been challenged.

3. Green Belt Matters

- 3.1 Green Belt matters are considered by DW from Section 2 onwards.
- 3.2 DW's approach conflates planning policy and landscape matters throughout, confusing both planning and perceptual matters. The approach taken by DW with respect to the character of the green belt is that one should identify the perceived extent of openness, rather than dealing with openness as a spatial matter, confirming at paragraph 3.25 that "*It would make more sense, when considering the harm to openness, to identify the perceived extent of openness*". Further, at 3.22 of his proof DW states that (with my emphasis) "*whilst the well vegetated*

boundaries and topography of the site sometimes restrict views, the site makes an obvious and important contribution to openness in a perceptual sense.” Overall, throughout DW’s evidence, openness is dealt with as a perceptual matter, rather than a planning policy spatial matter¹.

- 3.3 In any event, the perception of openness here in a visual sense does not exist to any material extent, in particular due to the fact that there are no public rights of way within the racecourse and the perception of the open character of the racecourse can only be appreciated from limited locations within the public domain. Glimpsed and partial views only are able to be obtained of views across the racecourse from a very limited number of publicly accessible locations. None of them are stated to be key views in the relevant published document i.e. Esher Design and Character Assessment SPD (CD3.2). The racecourse buildings will remain a local landmark and the view towards London from the grandstand is a private view and barely affected by any of the proposed development (CD3.2 p23). Perception of an area’s openness or lack of openness is relevant but cannot be given weight if unable to be seen, experienced and if formed by a receptor’s ‘imagination’ of what may lie behind a visual barrier, such as that of a close boarded fence or vegetation, as here. Perception in terms of landscape assessment is obtained as a result of the *experience* of a landscape not, as per DW, the *imagined* perception by receptors external to the racecourse. Essentially, from publicly accessible areas, receptors are not conscious to any material degree of the openness of the racecourse.
- 3.4 It is an exaggeration that (DW paragraph 3.22) “*By simply walking around the site perimeter it becomes very clear that there are multiple views into and across the site*”. I disagree with this statement.
- 3.5 As I have shown at Main Matter 3 within my Proof of Evidence, the proposed development of Sites 1-5 when viewed internally would not narrow the ‘gap’ visually (or in its width as Robert Clarke points out) to any material extent or harm the open character of the racecourse. When viewed externally, the racecourse is contained visually by built development around and, significantly, within it. Its openness would be visually enhanced by opening up views across the racecourse from More Lane.
- 3.6 In the context of the wider area, the racecourse is enclosed by tree cover and existing built form. There are no local higher points which afford views into it and from which views are available, these are generally obtained from areas within, or immediately adjacent to, the existing urban context in so far as of relevance and weight, the privately accessible views from the grandstand and higher ground, viewed from within the racecourse looking outwards e.g. towards London, are not materially affected by the proposed development and certainly not harmed. To summarise the visual context of the racecourse, and consider the perception of openness from land around it:

¹ This judgement of the perceptual appreciation of the Green Belt is reiterated in DW’s evidence at Paragraphs (inter alia) 3.20, 3.25, 3.26, 3.55 and 3.87.

- Lower Green Road: Glimpses only are obtainable of the existing grandstand across the racecourse and a partial view only. From the north-western end of Lower Green Road, there is a glimpse of built development behind the trees and the racecourse is not perceived as being free from development;
- More Lane: Glimpsed views only are possible on a short section of More Lane and the access to the racecourse with solid fencing, racecourse fencing, multiple signage and solid brick gate pillars, iron gates and mature trees and bushes in the foreground, else a partial view of built development and trees above solid fencing only is visible where not obscured by trees and bushes;
- Station Road: There are no views into the racecourse from Station Road and, importantly, receptors are not conscious of the racecourse being with or without development; and
- Portsmouth Road: Views into the racecourse from Portsmouth Road are only obtained from a short section in close proximity to the main access to the racecourse. Here, the existing grandstand is a dominant feature of the urban scene beyond a low quality landscaped car park and entrance road, with the main entrance and 'back of house' buildings beyond, with plant and air extraction units visible on the roof, giving rise to a utilitarian, functional and architectural poor quality to the view, detracting from the higher quality frontage to the grandstand which overlooks the racecourse.

4. Landscape/Townscape Matters

4.1 Landscape and Townscape matters are considered by DW from Section 4 onwards.

Consideration of Landscape and Townscape Character and Value

- 4.2 DW states at paragraph 10.19 that *“The LTVA (CD5.52) suggests that areas in close proximity to the Racecourse that are situated outside Character Area UW6 are considered to form part of an urban area. I do not agree with the Appellant’s logic that these sites should be considered part of an urban area.”* The sites are clearly part of the urban area of Esher. The ‘logic’ of the Landscape/Townscape and Visual Appraisal (LTVA) aligns with the Council’s own adopted Landscape Character Assessment (Surrey Landscape Character Assessment: Elmbridge Borough (2015) and the Elmbridge Borough Landscape Sensitivity Study (2019)).
- 4.3 No evidence is provided to justify DW’s statement at paragraph 5.15 that *“several of the proposed development sites ... are highly valued at a local scale.”* This does not appear in any published document of which I am aware.
- 4.4 DW states at paragraph 5.19 that *“I consider that the starting point for the baseline assessment to be the Landscape Sensitivity Study (LSS) (CD3.25)”*. Within the LSS, it is important to note that it concluded, with regard to the western areas of Landscape Unit UW6-

A, essentially being the racecourse itself, (my emphasis) *“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”.*

- 4.5 At paragraph 5.27, DW provides a conclusion of the landscape value and condition of the site. All but Site 3 are in general accordance with the judgements contained within the LTVA. However, DW then concludes at paragraph 5.28 that a number of the sites *“should be considered to be of a higher value than Local, more in line with the Borough value attached to Landscape Unit UW6-A”.* I would disagree. I concur with the overall ‘Commentary on Key Landscape Sensitivities’ within the LSS which states 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.”*

Methodology: Susceptibility to Change

- 4.6 DW’s evidence challenges the findings of the submitted LTVA, concluding that *“my own assessment of each of the disputed sites reveals a higher degree of sensitivity”.* I do not accept the evaluation criteria of DW. The application of such criteria is often used within countryside settings where built development is seen to be adverse in itself. It results in illogical conclusions within an urban context, where the same conclusion would be reached if a site were within an area of high landscape value or a site with a landscape designation.
- 4.7 DW states at paragraph 5.12 that *“It is not clear which ‘susceptibility factors’ have been considered and no transparency to the assessment of susceptibility.”* As set out within the methodology of the submitted LTVA (paragraph A1.24), *“It is therefore noted that sensitivity cannot be considered in isolation from the characteristics and nature of the proposed development. An assessment of townscape sensitivity to a particular type of change is therefore not truly part of the baseline but may be presented as such within a baseline report for expediency.”* At paragraph A1.38, the LTVA provides descriptions which *“are used as the basis for determining townscape sensitivity assessment criteria in the knowledge of the nature of the proposed development”.*
- 4.8 Importantly, susceptibility here must not be judged on the basis of countryside susceptibility, but with full consideration of the townscape context. Here, as in every urban context, a landscape-led approach must have regard to the built development existing in the area and adjacent to the proposed site, as well as to the surrounding vegetation, trees, roads, other built elements and views, including how the landscape or townscape is viewed or perceived.
- 4.9 The proposals are landscape led. The LTVA (CD5.52) at para 6.5 sets out the key landscape design principles. The racecourse related development is located adjacent to the existing racecourse functional area including the parade ring, offices and grandstand and is integrated with them without harm to the character of the area or openness. There would be enhancement of views from Portsmouth Road as well as opening up views across the racecourse from More Lane. The proposed built development in the central area of the racecourse on Areas C and D

would remove the existing scatter of poor quality buildings and hard surfaces, replace them with a single sensitively designed modern building to suit its setting and reduce the scale and visual impact, all of which would be a significant enhancement. The residential development is located on the least sensitive sites within the racecourse, set back from roads and integrated into the landscape with new tree planting. The Design and Access Statement explains the rationale behind the development principles proposed for each site.

- 4.10 I include **Appendix EDP 1** which provides my review of DWs judgements on susceptibility to change, along with my commentary on the condition and susceptibility to change of each site using EDP's methodology. None of the information included on such matters in DW's evidence was previously available.
- 4.11 Following my review, the majority of the sites proposed for development are considered to have a lower sensitivity than medium; this being the level of sensitivity afforded to the whole of the racecourse within the LTVA. As such, this illustrates that an inherent part of the mitigation in landscape and townscape terms is delivered through the land choice within the racecourse, being the least sensitive areas of the site as a whole. I do not agree that *"the overall landscape / townscape effect is far greater than reported in the LTVA"* as concluded by DW at paragraph 10.27.

Mitigation

- 4.12 DW states at paragraph 7.3 that *"It is difficult to take seriously the assertion in Paragraph 6.5 of the LTVA (CD5.52) that "the findings of EDP's early and ongoing field appraisals have been fed into the evolving proposals in order to ensure that the masterplan is landscape led". A truly landscape-led approach would have given priority to the protection and conservation of the landscape."* This assumes that any 'mitigation' must come from landscape planting, rather than a full understanding of the location, scale and architectural design of the proposals (this again reiterates the landscape focussed methodology and approach applied by DW).
- 4.13 Following pre-application discussions with the Council, Officers accepted that the proposed development:
- Includes mitigation measures such as new tree planting;
 - Set development back from the road (sites 4 and 5);
 - Enables the retention and management of boundary vegetation;
 - Provides additional planting and use of native locally sourced species;
 - Provides a new outdoor space with an open park, including a landscaped garden and children's cycle track; and

- Removes the go-kart track within the central areas of the racecourse.

4.14 I would add that every element of the proposed development is set back from the road and is integrated visually with existing built development. This includes the proposed hotel building on site B which would form an integrated whole with the immediately adjacent grandstand building. The view from Portsmouth Road would be enhanced by a well-designed hotel building in this location, sitting within an improved landscaped foreground as is proposed.

4.15 Given the urban context of the racecourse, mitigation in the form of substantial landscape planting may not be necessary, or would require only a light-touch treatment to assimilate new built form into the urban context, not intended to 'screen' views as one would in a countryside setting. For example, at the 'gateways' into Esher, particularly Site 4, it is not the case that buildings, or new built form must be regarded as negative, or necessarily have a negative impact on open character as is the case here, just because they are visible in local urban views.

Visual Amenity

4.16 Throughout the evidence of DW, reliance is placed upon the availability of views from within the racecourse. As set out within the Landscape Statement of Common Ground, the Racecourse is private land; there are no Public Rights of Way within it and any receptors visiting the Racecourse are doing so for a specific purpose (on race days, go karting, golfing etc) and, as such, are not especially influenced by an appreciation of the wider landscape.

4.17 At paragraph 6.4, DW states that *"The perimeter of the Appeal Site is surrounded by pedestrian routes that afford views into and across the Disputed Sites"*. This contradicts the findings of the LTVA, and also the Case Officer's Report to Committee which states at paragraph 9.8.2.39 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"*.

Assessment of Effects

Landscape/Townscape

4.18 At paragraph 8.17, DW states that *"In my opinion, the assessment does not properly consider the effects upon the Esher Conservation Area."* This would go beyond the professional scope of landscape and townscape assessment. It is important to note that whilst heritage assets can influence the visual character of the landscape and enrich its historic value, the LTVA addressed heritage assets only insofar as they are components of the wider contemporary landscape – not in terms of their significance and value as heritage assets, which is a matter addressed by the separate Heritage Assessment. 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.”

4.19 Following my commentary provided at **Appendix EDP 1**, I set out below specific comments in response to DW’s ‘Predicted Townscape and Visual Effects’:

- According to DW’s methodology, the ‘landscape/townscape’ effects arising from Sites 3, 4 and 5 are ‘substantial adverse’; this being the highest possible effect that can be ascribed by his methodology;
- Throughout DW’s assessment, with the exception of the removal of some Leylandii trees at the frontage of Site 2, in all cases DW considers the proposed development to be adverse;
- There is no acknowledgement of the beneficial effects of removing the metal gates at the western access to Site 1 at a ‘gateway’ site to Esher Green and the Conservation Area;
- There is no acknowledgement of the improvements to the western boundary fencing to the racecourse and the opportunity to open up specific longer distance views across the racecourse, increasing the perception of open character;
- There is no acknowledgement of the beneficial effects of including new built form within Site 4, which would be a positive addition to the local context, improving legibility; and
- There is no acknowledgement of the beneficial effects of improving the relationship between Site 5 and Portsmouth Road which would improve the quality of the approach to Esher.

4.20 The above is not surprising given the application by DW of a landscape specific methodology within an urban context, and the notion that landscape planting is required to “*screen the taller elements of a building*” (DW paragraph 9.29). Within an urban context, any assessment of effects should not rely only on the opportunity for visual screening through landscape planting, but rather an approach of considering opportunities for integration within the urban context.

4.21 Following my more detailed analysis of each of the sites included at **Appendix EDP 1**, I summarise my findings below in **Table EDP 1**.

Table EDP 1: Summary of Landscape Effects

Site	Condition	Susceptibility	Sensitivity	Magnitude of Change (As LTVA Table EDP 7.1)	Effect
Site B	Low	Low	Low	Medium	Minor

Site	Condition	Susceptibility	Sensitivity	Magnitude of Change (As LTVA Table EDP 7.1)	Effect
Site D	Low	Low	Low	Low	Minor/Negligible
Site 1	Medium	Low	Medium-Low	Very Low	Minor/Negligible to Negligible
Site 2	Low	Low	Low	Low	Minor/Negligible
Site 3	Medium	Medium	Medium	Medium	Moderate/Minor
Site 4	Low	Low	Low	Medium	Minor
Site 5	Low	Medium	Medium-Low	Medium	Moderate/Minor to Minor

4.22 With regard to landscape and townscape effects, I conclude that that there is no material adverse impact on landscape or townscape character. The sensitivity of the racecourse as a whole was considered by the LTVA to be medium. However, as stated above, the majority of the sites proposed for development are considered to have a lower sensitivity than medium. Overall effects are no greater than Moderate/Minor, with any adverse effects very geographically limited and not considered to change the character of the immediate urban context. Further, beneficial effects arise from the proposals, as set out above at paragraph 4.19.

Visual Amenity

4.23 At paragraph 9.38, DW states that *“It is disappointing that the LTVA (CD5.52) does not offer the predicted magnitudes of change and overall effects for each of the representative Photoviewpoints”*. At his Appendix 11, DW includes a judgement of the effects at each of the viewpoints included within the application, including the five additional views included by Council.

4.24 The LTVA included eleven representative viewpoints, agreed with Council prior to the submission of the application, which represent the experience of different types of receptors within the local context. For completeness, I include **Appendix EDP 2** which provides my commentary on the effects at each of the representative viewpoints.

4.25 At paragraph 9.43, with regard to his five additional views, DW states that *“I have included consideration of the likely effects upon these views at Appendix 12”*. However, only photographs are provided, with a following summary provided at paragraph 9.45 of DW’s main proof.

4.26 Five additional views, not considered by the LTVA, are included by DW at his Appendix 12. Although DW states that these are *“consistent with current Landscape Institute guidance for a Type 1 visualisation”*, I do not agree. Single frame imagery should only be used where the image *“can capture the site”* (Technical Guidance Note 06/19 - Visual Representation of Development

Proposals) (CD7.12), not a framed view of a minor part of it. The imagery provided by DW does not show the full context of each site, rather a framed view which shows little of the existing built form within it. In reality, a receptor is conscious of the wider view which includes adjacent built development. The guidelines (GLVIA3) states that viewpoints should not only cover the full range of receptors who may experience views within the local context, but also “*should be carefully considered and should be as typical or representative as possible of the view likely to be experienced here*”. In my opinion, DW’s imagery does not do this and, with this in mind, I have not provided an assessment of all five views within **Appendix EDP 2**.

4.27 For ease of comparison, applying but NOT accepting DW’s methodology that the consequence is inevitably adverse, I provide a summary table below of the findings of **Appendix EDP 2**:

Table EDP 2: Summary of Visual Effects at Representative Viewpoints

Photoviewpoint	Magnitude of Change	BC Overall Effect (long-term) (Receptor sensitivity provided at LTVA Table EDP 5.1)
1	Medium	The highest effect on public receptors (pedestrians) is Moderate (Adverse)
2	Low	The highest effect on public receptors (pedestrians) is Slight (Adverse)
3	Medium	Private View Slight (Adverse)
4	Medium	Private View Slight (Adverse)
5	Low	The highest effect on public receptors (pedestrians) is Slight (Adverse)
6	Low	The highest effect on public receptors (pedestrians) is Minimal/Slight (Adverse and Beneficial)
7	Medium	The highest effect on public receptors (pedestrians) is Slight (Adverse and Beneficial)
8	Medium	The highest effect on public receptors (pedestrians) is Slight (Adverse)
9	Medium	The highest effect on public receptors (PRoW users) is Moderate/Substantial (Adverse and Beneficial)
10	Low	The highest effect on public receptors (pedestrians) is Minimal/Slight (Adverse)
11	Medium	The highest effect on public receptors (pedestrians) is Slight (Adverse and Beneficial)
Additional View 5	Medium	The highest effect on public receptors (pedestrians) is Moderate (Adverse)

4.28 I conclude that that there is no material adverse impact on receptors at any location and that all but three of the impacts are below moderate with four Photoviewpoints having adverse and beneficial impacts. With respect to Photoviewpoints 6, 7, 9 and 11 (where the impact would be adverse and beneficial), DW’s methodology fails to take into account the beneficial effects of the development at these sites. Site 4 is at a Key Gateway to Esher and Site B (the new hotel) would be a new landmark next to the grandstand, an enhancement to the townscape and beneficial, Overall, the impact is no greater than moderate at any location.

5. Conclusions

- 5.1 I have reviewed my evidence in the light of DW's evidence and have reached the same conclusions as those contained in the LTVA and my proof of evidence.
- 5.2 Each of the viewpoint locations were agreed with the Council prior to the submission of the application and it is noteworthy that almost all are within the immediate context of the racecourse. The additional evidence and viewpoints proposed by DW have been assessed where appropriate and my evidence does not change as a result. Further, the LTVA assessment is correct and does not require amendment.
- 5.3 I remain of the view that the character of the open landscape designated Green Belt (which is not a landscape character designation) is that of a semi-urban racecourse and would remain as such without any material change or material harm caused by the development. The development would produce enhancement to the character and appearance of the area in a number of locations, with highly localised adverse effects experienced in an urban context, with only one of these locations causing moderate/minor adverse effect, with no beneficial effect to balance these (Photoviewpoint EDP 1).
- 5.4 As demonstrated by the visual analysis and views presented above, the appeal site as a whole is 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.
- 5.5 The fact that proposed development would be visible within the urban scene from certain (limited) viewpoints, and the conclusion that it is therefore inevitably adverse, is to apply the wrong methodology in an urban context. Within this urban context, a 'landscape-led' approach must have regard not only to soft landscape planting, but to the built development existing in the area and adjacent to the proposed site, as well as to the surrounding vegetation, trees, roads, other built elements and views, including how the landscape or townscape is viewed or perceived and able to be mitigated, if necessary.
- 5.6 I agree with the Council's Committee Report (Core Document CD7.3) which concludes that "*In terms of their impact on the character of the area in general, the developments are unlikely to be harmful...*", and that "*Due to their location near/adjacent to the town centre, where such built form is commonly present, it is unlikely that [the proposed development] would be out of place in principle*".
- 5.7 I remain of the view that the proposed development will address the constraints of the appeal site and would retain, at least where views into the Racecourse are possible, views across the open land, thereby retaining and, where views are opened up, enhancing the sense of open character within the Racecourse and not materially changing its semi-urban character.



Appendix EDP 1
Sandown Parcel Assessment

Review of Landscape/Townscape Susceptibility							
	Findings of DW			Findings of BC (Using EDP Methodology)			
	DW Value	DW Landscape Susceptibility Definition (DW Appendix 1: Table 3)	DW Overall Sensitivity	BC Comment on Susceptibility (Referring to DW Methodology)	BC Assessment: Susceptibility (Using EDP Methodology)	BC Overall Sensitivity	BC Assessment (completion)
Site B	Low (Ordinary)	High. “A landscape, including topographic form, features and visual attributes, that would be unlikely to accommodate the specific proposed development without undue negative consequences including such issues such as being out of scale and out of character. Effective, in character, mitigation would be difficult to achieve, would be very unlikely to enhance.”	Overall Sensitivity: Medium	I do not consider that the proposed development would be “out of scale and out of character”. Further, landscape mitigation in this context would also be considered to be ‘in character’ and would also be likely to enhance the urban context. Using DW’s methodology, a ranking of Low would be more appropriate, in that the site “would be likely to be able to accommodate the specific proposed development with not more than very minor negative consequences”, as it is not out of character with built form within the racecourse.	<u>Condition:</u> Low , being a “Townscape area or setting of feature where the general mixture of elements result in an indistinct and ambiguous character. Where the man-made, historic and natural elements are evidently discordant and in a degraded condition. Where there are several detractors and poor scenic quality.” <u>Proposed Development:</u> Redevelopment and rationalisation of the stables, the paddock area, pre-parade ring, horse box parking area and re-provision of stable staff accommodation and associated facilities. <u>Susceptibility:</u> Low , being “Partially degraded and transient in nature with no features of recognised value. Tolerant of some change and capable of repair or enhancement.”	Overall Sensitivity: Low	Magnitude of Change: Medium Overall Effect: Minor
Site D	Low (Ordinary)	Medium. “A landscape, including topographic form, features and visual attributes, that would be reasonably able to accommodate the specific proposed development without negative consequences including such issues such as in scale and character which and would not therefore be wholly out of character. Effective, in character, mitigation would be possible, but results may take time to be effective and exceptionally might give rise to an element of enhancement.”	Overall Sensitivity: Medium-Low	I disagree with the finding that “mitigation would be possible, but results may take time to be effective” as this implies that landscape planting is required within an urban context to render the scheme appropriate, Using DW’s methodology, a ranking of Low would be more appropriate, in that the site “would be likely to be able to accommodate the specific proposed development with not more than very minor negative consequences	<u>Condition:</u> Low , being a “Townscape area or setting of feature where the general mixture of elements result in an indistinct and ambiguous character. Where the man-made, historic and natural elements are evidently discordant and in a degraded condition. Where there are several detractors and poor scenic quality.” <u>Proposed Development:</u> 150-room hotel (Class C1). <u>Susceptibility:</u> Low , being “Partially degraded and transient in nature with no features of recognised value. Tolerant of some change and capable of repair or enhancement.”	Overall Sensitivity: Low	Magnitude of Change: Low Overall Effect: Minor/Negligible
Site 1	Medium (Good)	High. “A landscape, including topographic form, features and visual attributes, that would be unlikely to accommodate the specific proposed development without undue negative consequences including such issues such as being out of scale and out of character. Effective, in character, mitigation would be difficult to achieve, would be very unlikely to enhance.”	Overall Sensitivity: Medium-High	Using DW’s methodology, a ranking of Low would be more appropriate. With consideration of the site’s immediate and wider urban context, the site “would be likely to be able to accommodate the specific proposed development with not more than very minor negative consequences including such issues such as being in scale and character which and would therefore not be out of character.”	<u>Condition:</u> Medium , being a “Townscape area or setting of feature with a diversity of elements that combine to produce a recognisable but inconsistent character. Where the man-made, historic and natural elements are generally balanced and in fair condition. Where there are some detractors but overall, a pleasant scenic quality.” <u>Proposed Development:</u> demolition of the existing facilities to be replaced by new flatted mews development of circa 15no. residential units (Use Class C3), associated access off More Lane, parking, and landscaping. Building height ranges between 2 to 3 storeys, comprising a mix of 1 and 2 beds.	Overall Sensitivity: Medium-Low	Magnitude of Change: Very Low Overall Effect: Minor/Negligible to Negligible

Review of Landscape/Townscape Susceptibility							
	Findings of DW			Findings of BC (Using EDP Methodology)			
	DW Value	DW Landscape Susceptibility Definition (DW Appendix 1: Table 3)	DW Overall Sensitivity	BC Comment on Susceptibility (Referring to DW Methodology)	BC Assessment: Susceptibility (Using EDP Methodology)	BC Overall Sensitivity	BC Assessment (completion)
					Susceptibility: Low , being “Partially degraded and transient in nature with no features of recognised value. Tolerant of some change and capable of repair or enhancement.”		
Site 2	Low (Ordinary)	Medium. “A landscape, including topographic form, features and visual attributes, that would be reasonably able to accommodate the specific proposed development without negative consequences including such issues such as in scale and character which and would not therefore be wholly out of character. Effective, in character, mitigation would be possible, but results may take time to be effective and exceptionally might give rise to an element of enhancement.”	Overall Sensitivity: Medium-Low	Notably, Site 2 received planning permission for a proposed hotel in 2008 (Planning Reference 2008/0729). In its conclusion, the Landscape and Visual Appraisal that supported the application stated that “The new hotel could become not only a pivotal attraction amongst the existing racecourse buildings, but central to the amalgamating landscape areas of green belt, racecourse and townscape”, and the “the overall landscape objective is one of integration”. I would agree that development within Site 2 “would not be wholly out of character” within the urban scene however, I do not consider that effective mitigation would take time to be effective. Integration is key to mitigation, rather than a need to screen with planting.	Condition: Low , being a “Townscape area or setting of feature where the general mixture of elements result in an indistinct and ambiguous character. Where the man-made, historic and natural elements are evidently discordant and in a degraded condition. Where there are several detractors and poor scenic quality.” <u>Proposed Development:</u> demolition of the existing buildings to be replaced by new flatted development of circa 49no. residential units (Use Class C3) fronting Esher High Street with associated access, parking, and landscaping. Building height will range from 3 to 4 storeys, comprising a mix of 1, 2 and 3 beds. The parking area will be covered by a landscaped deck over Susceptibility: Low , being “Partially degraded and transient in nature with no features of recognised value. Tolerant of some change and capable of repair or enhancement.”	Overall Sensitivity: Low	Magnitude of Change: Low Overall Effect: Minor/Negligible
Site 3	Medium (Good)	High. “A landscape, including topographic form, features and visual attributes, that would be unlikely to accommodate the specific proposed development without undue negative consequences including such issues such as being out of scale and out of character. Effective, in character, mitigation would be difficult to achieve, would be very unlikely to enhance.”	Overall Sensitivity: Medium-High	There is a greater degree of tree cover within Site 3 when compared to other sites within the racecourse. The visual relation between the site and Lower Green Road is limited. As such, its landscape and townscape context is informed by built form within the racecourse and also built form on More Lane. Using DW’s methodology, a ranking of Medium would be more appropriate, in that the site “would be reasonably able to accommodate the specific proposed development without negative consequences including such issues such as in scale and character which and would not therefore be wholly out of character”.	Condition: Medium , being a “Townscape area or setting of feature with a diversity of elements that combine to produce a recognisable but inconsistent character. Where the man-made, historic and natural elements are generally balanced and in fair condition. Where there are some detractors but overall, a pleasant scenic quality.” <u>Proposed Development:</u> demolition of existing buildings to be replaced by new residential villa development of circa 108 residential units (Use Class C3) fronting the racecourse, with associated access off Lower Green Road, parking and landscaping. The buildings will be 3 storeys in height, comprising a mix of one and two beds. Susceptibility: Medium , being a “Townscape of medium quality with some distinguishing features. Some townscape resilience and capacity due to diversity of character.”	Overall Sensitivity: Medium	Magnitude of Change: Medium Overall Effect: Moderate/Minor
Site 4	Medium (Good)	High. “A landscape, including topographic form, features and visual attributes, that would be unlikely to accommodate the specific proposed development without undue negative	Overall Sensitivity: Medium-High	The site is currently in use as a temporary storage ground, with a parking area at its western end. There are large elements of commercial built form within the immediate context of the site. Further, the site is located in close proximity to a ‘gateway’ to Esher	Condition: Low , being a “Townscape area or setting of feature where the general mixture of elements result in an indistinct and ambiguous character. Where the man-made, historic and natural elements are evidently discordant and in a degraded condition. Where there are several detractors and poor scenic quality.”	Overall Sensitivity: Low	Magnitude of Change: Medium Overall Effect: Minor

Review of Landscape/Townscape Susceptibility							
Findings of DW			Findings of BC (Using EDP Methodology)				
DW Value	DW Landscape Susceptibility Definition (DW Appendix 1: Table 3)	DW Overall Sensitivity	BC Comment on Susceptibility (Referring to DW Methodology)	BC Assessment: Susceptibility (Using EDP Methodology)	BC Overall Sensitivity	BC Assessment (completion)	
	<i>consequences including such issues such as being out of scale and out of character. Effective, in character, mitigation would be difficult to achieve, would be very unlikely to enhance.</i>		which gives rise to contribute to legibility within the urban context. As such, I do not consider that the site “would be unlikely to accommodate the specific proposed development without undue negative consequences”. Using DW’s methodology, a ranking of Low would be more appropriate. With consideration of the site’s immediate and wider urban context, the site “would be likely to be able to accommodate the specific proposed development with not more than very minor negative consequences including such issues such as being in scale and character which and would therefore not be out of character.”	<u>Proposed Development:</u> development of circa 72no. new residential units (Use Class C3), associated access off Station Road, basement parking, and landscaping. Building heights will be split into 3 elements – 4 storeys, 5 storeys and 6 storeys, comprising a mix of 1, 2 and 3 beds Susceptibility: Low , being “Partially degraded and transient in nature with no features of recognised value. Tolerant of some change and capable of repair or enhancement.”			
Site 5	Medium (Good)	High. “A landscape, including topographic form, features and visual attributes, that would be unlikely to accommodate the specific proposed development without undue negative consequences including such issues such as being out of scale and out of character. Effective, in character, mitigation would be difficult to achieve, would be very unlikely to enhance.”	Overall Sensitivity: Medium-High	The site is located on Portsmouth Road, a busy vehicular route in to the centre of Esher. Along the route, there are numerous elements of large built form, including large villas set back from the road and large commercial uses to the east. With consideration of the site’s urban context, using DW’s methodology, a ranking of Low would be more appropriate. With consideration of the site’s immediate and wider urban context, the site “would be likely to be able to accommodate the specific proposed development with not more than very minor negative consequences including such issues such as being in scale and character which and would therefore not be out of character.”	Condition: Low , being a “Townscape area or setting of feature where the general mixture of elements result in an indistinct and ambiguous character. Where the man-made, historic and natural elements are evidently discordant and in a degraded condition. Where there are several detractors and poor scenic quality.” <u>Proposed Development:</u> development of circa 68 no. new residential units (Use Class C3) and re-provision of a Class D1 children’s nursery with associated access, parking and landscaping. Separate accesses are proposed to serve the residential use off Portsmouth Road. The access to the proposed nursery will continue to be accessed via the main entrance to Sandown Park Racecourse. The flatted residential development comprises 4 storeys comprising a mix of 1, 2 and 3 beds. The new nursery comprises 2 storeys Susceptibility: Medium , being a “Townscape of medium quality with some distinguishing features. Some townscape resilience and capacity due to diversity of character.”	Overall Sensitivity: Medium-Low	Magnitude of Change: Medium Overall Effect: Moderate/Minor to Minor



Appendix EDP 2
Sandown Visual Assessment

Review of Assessment of Effects					
	Findings of DW		Findings of BC		
	Magnitude of Change	Overall Effect (All are Adverse)	BC Comment (Referring to DW Methodology)	BC Magnitude of Change	BC Overall Effect (Applying but not accepting DW Methodology) (DW specifies a sensitivity for some, not all, receptors at each viewpoint). Therefore, for consistency within this review, I have retained the sensitivity values set out within the LTVA at Table EDP 5.1)
Photoviewpoint EDP 1	High Adverse	Residents - Substantial Pedestrians – Moderate Substantial Cyclists and Motorists – Moderate	DW states that “There would visibly be a deterioration in the visual amenity of this part of the Racecourse as a result of the proposed development at Site 3”. I disagree that the introduction of built form within an urban context should immediately be considered to be adverse. The highest effect on public receptors is Moderate Substantial which, according to DW’s methodology would result in a “very significant deterioration” or a “noticeable and clear deterioration” in the view.	The proposed development would be visible and identifiable within the view. However, in character, the proposed massing of development would remain consistent with existing built form on More Lane. Revised Magnitude of Change: Medium	DW does not specify a receptor sensitivity. Using EDP Methodology Receptor Sensitivity: Road Users – Slight Roadside Pedestrians – Moderate Residents – Moderate/Substantial The highest effect on public receptors is Moderate (Adverse)
Photoviewpoint EDP 2	High Adverse	Residents - Substantial Pedestrians – Moderate Substantial Cyclists and Motorists – Moderate	DW states that “There would visibly be a deterioration in the visual amenity of this part of the Racecourse as a result of the proposed development at Site 3”. I disagree that the introduction of built form within an urban context should immediately be considered to be adverse. The highest effect on public receptors is Moderate Substantial which, according to DW’s methodology would result in a “very significant deterioration” or a “noticeable and clear deterioration” in the view.	This view represents views that are predominantly limited to More Lane. The proposed development would be visible and identifiable within a minor part of the view, where existing built form can already be seen. The perceived character of the proposed development would be consistent with those visible within the immediate context. Further, DW has failed to acknowledge the benefits arising from the alteration to the racecourse fencing which would serve to open up views across the racecourse. Revised Magnitude of Change: Low	DW does not specify a receptor sensitivity. Using EDP Methodology Receptor Sensitivity: Pedestrians – Slight Road Users – Minimal/Slight The highest effect on public receptors is Slight (Adverse)
Photoviewpoint EDP 3	High Adverse	Racecourse Visitors - Moderate	There are no effects on public receptors (The racecourse is private land). For receptors within the racecourse, according to DW, the proposed development would result in a “noticeable and clear deterioration” in the view.	This is a private view taken from within the racecourse. Within this view, existing large built form can be seen extending along More Lane, with existing properties seen within Site 3. Beyond existing tree cover, residential properties on Lower Green Road are also visible. The proposed development would become an immediately obvious new feature of the urban scene, although being consistent with built form seen within the view on More Lane. At year 1, the magnitude of change would be high due to it being an immediately obvious new feature within the view (although being consistent with built form within the local context). However, proposed landscape measures within Site 3 would assimilate the proposed development into its local context, being seen as part of the built framework of the	DW receptor sensitivity: Low (giving rise to a Slight Effect) Using EDP Methodology Receptor Sensitivity: Visitors to the Racecourse (Private View) – Year 1: Moderate. Year 15: Slight (Adverse)

Review of Assessment of Effects					
	Findings of DW		Findings of BC		
	Magnitude of Change	Overall Effect (All are Adverse)	BC Comment (Referring to DW Methodology)	BC Magnitude of Change	BC Overall Effect (Applying but not accepting DW Methodology) (DW specifies a sensitivity for some, not all, receptors at each viewpoint). Therefore, for consistency within this review, I have retained the sensitivity values set out within the LTVA at Table EDP 5.1)
				Racecourse with mature tree cover providing a contribution to the wider context. The long-term magnitude of change would be medium . Revised Magnitude of Change: Medium	
Photoviewpoint EDP 4	High Adverse	Racecourse Visitors - Moderate	There are no effects on public receptors (The racecourse is private land). For receptors within the racecourse, according to DW, the proposed development would result in a “noticeable and clear deterioration” in the view.	This is a private view taken from within the racecourse. Due to the elevation of the receptor, built form can be seen extending along More Lane and then continuing along Lower Green Road, despite the northern boundary of the racecourse being perceived as being well-treed. The proposed development would be considered to form a visible and identifiable element within the view, but not changing the character of the outlook, particularly with the immediate context being identifiable as a racecourse. Revised Magnitude of Change: Medium	DW receptor sensitivity: Low (giving rise to a revised Slight Effect) Using EDP Methodology Receptor Sensitivity: Visitors to the Racecourse (Private View) – Slight (Adverse)
Photoviewpoint EDP 5	Medium Adverse	Pedestrians – Moderate Substantial	The highest effect on public receptors is Moderate Substantial which, according to DW’s methodology would result in a “very significant deterioration” or a “noticeable and clear deterioration” in the view.	In the medium to long term, the continued maturation of landscape proposals within the southern areas of the site would serve to provide some degree of screening. However, the proposed development is likely to remain visible in local views, although unlikely to be seen as a skyline feature given the wooded backdrop to the view. In the long-term, the proposed development would neither be framed nor prominent and therefore not be readily noticeable. Revised Magnitude of Change: Low	DW receptor sensitivity: high (giving rise to a revised Moderate Effect) Using EDP Methodology Receptor Sensitivity: Pedestrians – Slight Road Users – Minimal/Slight The highest effect on public receptors is Slight (Adverse)
Photoviewpoint EDP 6	Medium Adverse	Residents – Moderate Substantial Pedestrians – Moderate Cyclists and Motorists – Slight	The highest effect on public receptors is Moderate which, according to DW’s methodology would result in a “noticeable and clear deterioration” in the view.	Notably, an approved planning application for a hotel (Ref. 2008/0729) has also considered views from this context. The proposed development would provide a beneficial contribution to the immediate urban context through the replacement of the poor-quality boundary treatment aligning Portsmouth Road.	DW does not specify a receptor sensitivity. Using EDP Methodology Receptor Sensitivity: Pedestrians – Minimal/Slight Road Users – Minimal/Slight The highest effect on public receptors is Minimal/Slight (Adverse and Beneficial)

Review of Assessment of Effects					
	Findings of DW		Findings of BC		
	Magnitude of Change	Overall Effect (All are Adverse)	BC Comment (Referring to DW Methodology)	BC Magnitude of Change	BC Overall Effect (Applying but not accepting DW Methodology) (DW specifies a sensitivity for some, not all, receptors at each viewpoint). Therefore, for consistency within this review, I have retained the sensitivity values set out within the LTVA at Table EDP 5.1)
				Despite the location of the site on elevated ground above Portsmouth Road, the proposed development would only be seen as a minor addition to the townscape context due to screening afforded by mature tree cover on the road below. Revised Magnitude of Change: Low	
Photoviewpoint EDP 7	High Adverse	Residents – Substantial Pedestrians – Moderate Substantial Cyclists and Motorists – Moderate	The highest effect on public receptors is Moderate Substantial which, according to DW's methodology would result in a "very significant deterioration" or a "noticeable and clear deterioration" in the view.	The proposed development would largely be seen in the context of large built form within the Racecourse, namely the Grandstand, being set back from Portsmouth Road. Given the intervisibility with a short section of Portsmouth Road, the proposed development would be considered to form a visible and identifiable element within the view, but not changing the character of the immediate urban context. Revised Magnitude of Change: Medium	DW does not specify a receptor sensitivity. Using EDP Methodology Receptor Sensitivity: Pedestrians – Slight Road Users – Minimal/Slight The highest effect on public receptors is Slight (Adverse and Beneficial)
Photoviewpoint EDP 8	Medium High Adverse	Pedestrians – Moderate Cyclists and Motorists – Slight Moderate	The highest effect on public receptors is Moderate which, according to DW's methodology would result in a "noticeable and clear deterioration" in the view.	The proposed development would largely be seen in the context of large built form within the Racecourse and those aligning Portsmouth Road. The retention of the Tollhouse would serve to maintain the perceived pinch-point in built form for receptors travelling in and out of the centre of Esher. However, in the short-term, the removal of some poorer quality trees within the site, although being replaced, would be perceived as a loss to the existing landscape fabric within the urban scene. The proposed development would be considered to form a visible and identifiable element within the view, but not changing the character of the immediate urban context. Revised Magnitude of Change: Medium	DW does not specify a receptor sensitivity. Using EDP Methodology Receptor Sensitivity: Pedestrians – Slight Road Users – Minimal/Slight The highest effect on public receptors is Slight (Adverse and Beneficial)
Photoviewpoint EDP 9	High Adverse	Pedestrians – Moderate Substantial	The highest effect on public receptors is Moderate Substantial which, according to DW's methodology would result in a "very significant deterioration" or a "noticeable and clear deterioration" in the view.	The proposed development would be seen as a skyline feature, although seen in the context of existing commercial development aligning Portsmouth Road. The 'gateway' location of the site provides an opportunity to improve the legibility of the approach to Esher and the identity of the	DW does not specify a receptor sensitivity. Using EDP Methodology Receptor Sensitivity: PRoW users – Moderate/Substantial

Review of Assessment of Effects					
	Findings of DW		Findings of BC		
	Magnitude of Change	Overall Effect (All are Adverse)	BC Comment (Referring to DW Methodology)	BC Magnitude of Change	BC Overall Effect (Applying but not accepting DW Methodology) (DW specifies a sensitivity for some, not all, receptors at each viewpoint). Therefore, for consistency within this review, I have retained the sensitivity values set out within the LTVA at Table EDP 5.1)
				<p>racecourse within the urban context. Although likely to be visible above existing built form, the proposed development would be considered a minor element of local views which are characterised by numerous commercial elements surrounding the site.</p> <p>Revised Magnitude of Change: Medium</p>	The highest effect on public receptors is Moderate Substantial (Adverse and Beneficial)
Photoviewpoint EDP 10	Medium Adverse	Train Users – Slight Adverse	The highest effect on public receptors is Slight Adverse, being a “ <i>perceptible but small Deterioration</i> ” in visual appearance.	<p>The proposed development would be barely perceptible from this location, largely due to mature tree cover within the local context (on Station Road and on Lower Green Road). As such, the proposed development would constitute a minor feature of the view.</p> <p>Revised Magnitude of Change: Low</p>	<p>DW does not specify a receptor sensitivity.</p> <p>Using EDP Methodology Receptor Sensitivity: Pedestrians – Minimal/Slight</p> <p>The highest effect on public receptors is Minimal/Slight (Adverse)</p>
Photoviewpoint EDP 11	High Adverse	Residents - Substantial Pedestrians – Moderate Substantial Cyclists and Motorists – Slight Moderate	The highest effect on public receptors is Moderate Substantial which, according to DW’s methodology would result in a “ <i>very significant deterioration</i> ” or a “ <i>noticeable and clear deterioration</i> ” in the view.	<p>This view illustrates the character of Portsmouth Road. In this view, the proposed development would be identifiable within the view due to the proximity of the receptor. The character of the view would not change, being informed by large built form within the racecourse. However, there would be a partial reduction in views across the racecourse (which are currently obscured by the gates to the racecourse). New built from provides the opportunity for enhancing the view by screening the ‘back of house’ character afforded by some elements of the grandstand.</p> <p>Revised Magnitude of Change: Medium</p>	<p>DW does not specify a receptor sensitivity.</p> <p>Using EDP Methodology Receptor Sensitivity: Pedestrians – Slight Road Users – Minimal/Slight Residents – Moderate/Substantial</p> <p>The highest effect on public receptors is Slight (Adverse and Beneficial)</p>
Additional Viewpoint 1	Not Specified	Receptor: Residents - Substantial Receptor: Pedestrians – Moderate Substantial Receptor: Road Users – Moderate	<p>DW provides a framed view from Lower Green Road with little reference to the existing context. There are no identifiable features within the view which are either characteristic of the racecourse, or Lower Green Road.</p> <p>The highest effect on public receptors is Moderate Substantial which, according to DW’s methodology would result in a “<i>very significant deterioration</i>” or a “<i>noticeable and clear deterioration</i>” in the view.</p>	<p>Given the narrow view presented, I do not consider that this view is representative of the local context. As such, I would recommend to the Inspector that views from this context are considered further by way of a site visit.</p>	

Review of Assessment of Effects					
	Findings of DW		Findings of BC		
	Magnitude of Change	Overall Effect (All are Adverse)	BC Comment (Referring to DW Methodology)	BC Magnitude of Change	BC Overall Effect (Applying but not accepting DW Methodology) (DW specifies a sensitivity for some, not all, receptors at each viewpoint). Therefore, for consistency within this review, I have retained the sensitivity values set out within the LTVA at Table EDP 5.1)
Additional Viewpoint 2	Not Specified	Receptor: Residents – Moderate Substantial Receptor: Pedestrians – Moderate Substantial Receptor: Road Users – Slight Moderate	DW provides a framed view looking along Station Road where views are limited to the immediate context by mature tree cover and the boundary fencing to the racecourse. DW has failed to highlight the opportunity for the contribution of built form within the site contributing positively to the urban context. Instead, any built form is seen as being adverse. The highest effect on public receptors is Moderate Substantial which, according to DW's methodology would result in a "very significant deterioration" or a "noticeable and clear deterioration" in the view.	Given the narrow view presented, I do not consider that this view is representative of the local context. As such, I would recommend to the Inspector that views from this context are considered further by way of a site visit.	
Additional Viewpoint 3	Not Specified	Receptor: Residents – Moderate Substantial Receptor: Pedestrians – Moderate Substantial Receptor: Road Users – Slight Substantial	DW provides a narrow view of the boundary fencing to Site 5. There is no view across the racecourse in the view, nor are any of the key characteristics of the urban scene shown. The highest effect on public receptors is Moderate which, according to DW's methodology would result in a "noticeable and clear deterioration" in the view. <u>Note: 'Slight Substantial' is not defined within DW's methodology.</u>	Given the narrow view presented, I do not consider that this view is representative of the local context. As such, I would recommend to the Inspector that views from this context are considered further by way of a site visit.	
Additional Viewpoint 4	Not Specified	Receptor: Residents – Moderate Substantial Receptor: Pedestrians – Moderate Substantial Receptor: Road Users – Moderate	DW has failed to acknowledge the beneficial effects arising from the removal of the very tall security fencing within this 'gateway' approach to Esher. Any views of built form behind the existing would not materially impact upon open character as they lie behind existing built form with a wooded backdrop. Again, the addition of built form is simply seen as being adverse. The highest effect on public receptors is Moderate Substantial which, according to DW's methodology would result in a "very significant deterioration" or a "noticeable and clear deterioration" in the view.	Given the narrow view presented, I do not consider that this view is representative of the local context. As such, I would recommend to the Inspector that views from this context are considered further by way of a site visit.	
Additional Viewpoint 5	Not Specified	Receptor: Residents - Substantial Receptor: Pedestrians – Moderate Substantial Receptor: Road Users – Moderate	DW provides a view that looks through the access to the racecourse, which is obtained from a very short section of More Lane. In this view, existing development within Site 3 can be seen, along with	The proposed development, within Site 3, would be set on lower ground within the racecourse where existing built form can already be seen. Due to the elevation of the receptor, it is likely that the well-	DW does not specify a receptor sensitivity. Using EDP Methodology Receptor Sensitivity: Pedestrians (Medium Sensitivity) - Moderate

Review of Assessment of Effects					
	Findings of DW		Findings of BC		
	Magnitude of Change	Overall Effect (All are Adverse)	BC Comment (Referring to DW Methodology)	BC Magnitude of Change	BC Overall Effect (Applying but not accepting DW Methodology) (DW specifies a sensitivity for some, not all, receptors at each viewpoint). Therefore, for consistency within this review, I have retained the sensitivity values set out within the LTVA at Table EDP 5.1)
			<p>numerous elements of visual 'clutter' that are representative of the site's use as a racecourse.</p> <p>The highest effect on public receptors is Moderate Substantial which, according to DW's methodology would result in a "very significant deterioration" or a "noticeable and clear deterioration" in the view.</p>	<p>treed backdrop to the view would remain, with the key focal point of the view being the longer view to London. Given the presence of existing built form within the view, and with consideration of similar built form on More Lane within the local context, the proposed development would not be considered to be a 'new' feature within the view, but would be visible and identifiable within the view; readily detected by the majority of viewers.</p> <p>Magnitude of Change: Medium</p>	<p>Road Users (Low Sensitivity) – Slight</p> <p>The highest effect on public receptors is Moderate (Adverse)</p>

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