

Sandown Park Racecourse, Esher – APP/K3605/W/20/3249790

Rebuttal of Evidence: Peter Whicheloe

JCR3/5: edp5237_r015a

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 Peter Whicheloe (PW) of the Sandown Park Appeal Group.
- 1.3 This document is not intended to address every point raised by PW, nor circumvent the requirement to consider these further during the Inquiry; it has been produced to provide my own interpretation of the proposed development as seen in local views.

2. General Points

- 2.1 Without carrying out extensive work to verify the sketches in terms of their heights, orientation and built form, it is only possible at best to conclude whether the maximum heights of the buildings and the locations shown in the sketches appear to be reasonably accurate or are clearly inaccurate.
- 2.2 In order to assist, I have used freely available software (Google Earth Pro) (GE) in order to analyse the views presented by PW. Further, I have produced annotated photos already submitted (refer to **Appendix EDP 1**) with lines showing my interpretation of the locations, extent and maximum height of the proposed buildings where able to be verified, with the use of GE, together with a series of Google Street View screenshots (refer to **Appendix EDP 2**) showing the extent of foreground and middle distance landscaping which has not been included in the sketches in order to provide context.
- 2.3 The descriptions of the locations, form and maximum heights of the buildings are to be taken from the Indicative Layout plans (PL20x series) (CDs 5.30-36), recognising these to be illustrative, and Parameter Plans (CDs 5.22-24 and 26) submitted with the planning application which give max heights of buildings above Ordnance Datum (aOD), storeys and ground levels. It is also to be noted that the appellant has proposed a condition that the development should be generally in accordance with these.
- 2.4 I became aware that GE could be used as a tool in this manner in recent weeks and, as such, had not been able to consider the inclusion of such views previously. The use of GE in this

manner is not intended to replace the accuracy provided by more detailed methods accepted as industry standards. However, as above, and given the time available, my intention is to provide my own, transparent, interpretation of the scale of the proposed development within this urban context. I have cross checked against other information I and the architects have including verified views, heights and ground levels and consider the use of GE a reasonably accurate tool to determine the visual impact of the proposed development in its context.

2.5 By way of transparency, I set out below some general commentary on the use of freely available software such as GE:

- With regard to vertical levels, GE rounds to the nearest metre. With this in mind, as shown at **Appendix EDP 1** and **2**, I have stated the differences in ground floor heights and built form heights where different to those referenced within the DAS. For ease, these are:
 - Site 1 – Modelled ground floor level: 40m aOD (39.8m stated within the DAS);
 - Site 2 – Modelled ground floor level: 31m aOD (31.0m stated within the DAS);
 - Site 3 – Modelled ground floor level: 14m aOD (13.7m stated within the DAS);
 - Site 4 – Modelled ground floor level: 13m aOD (13.3m stated within the DAS);
 - Site 5 – Modelled ground floor level: 18m aOD (18m stated within the DAS); and
 - Site B – Modelled ground floor level: 26m aOD (26m stated within the DAS).
- Similarly, GE also rounds the proposed development heights to the nearest metre. With consideration of a single storey being 3.15m, then allowing for a 300mm parapet at roof level, the proposed development heights modelled are as follows:
 - 1 storey = Actual: 3.45m. Modelled: 3m;
 - 2 storey = Actual: 6.6m. Modelled: 7m;
 - 3 storey = Actual: 9.75m. Modelled: 10m;
 - 4 storey = Actual: 12.9m. Modelled: 13m;
 - 5 storey = Actual: 16.05mm. Modelled: 16m; and
 - 6 storey = Actual: 19.2m. Modelled: 19m.



3. Summary of PW Visualisations

3.1 Despite PW stating at page 2 (paragraph not numbered) that “*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*”, there is little or no transparency in the level of accuracy presented. As such, I can give very little weight to the images provided.

3.2 My summary of each of PW’s sketches are set out below.

Site 3

3.3 When viewed from within the racecourse (which is private land) from the access road from More Lane to Sites C and D as well as from the grandstand and Eclipse building, all of the Site 3 buildings would be viewed as being below the horizon and below the tree tops, against other buildings behind on Lower Green Road and of a similar height to and scale of the More Lane villas to their left (west); as stated in my evidence, this would not be harmful to the character of the Racecourse and would be in keeping with the character of existing More Lane buildings, in particular in the longer term (15 years plus) when landscaping matures. When viewed from More Lane, only the upper part of some of the buildings would be able to be viewed, with a close boarded fence and, as one travels along More Lane, gate pillars, signage, trees and bushes appear in the foreground depending on where the viewer is standing.

3.4 I do not accept PW’s ‘Detailed Visualisation’ of Site 3. This provides a narrow view of the proposed development that is neither representative of the focal length of the human eye, nor considers the character of the site and its context.

3.5 The illustrations provided by PW emphasis the vertical and horizontal scale of the proposed development. This is not helped by the proposals being depicted as white buildings on a rather dark background and, in my opinion, are not representative of the form or scale of built form proposed within the illustrative material that accompanied the planning application.

Site 4

3.6 The proposed building is only visible on the approach to the Portsmouth Road/Station Road junction over a relatively short distance. The building would be at a recognised Gateway site to Esher and appropriately is seen above the Café Rouge building and adjacent industrial buildings. Currently the Gateway does not function as such to any great extent and requires a landmark building to perform this function in the landscape. Its size, height and massing is wholly appropriate for this location and would enhance legibility within the local context.

3.7 Mr Whicheloe’s sketch incorrectly shows a taller projecting gable with a ridge which would be above the maximum height of the building. It is also considered that the other ridges of the sketch building are too high as shown.

- 3.8 Again, the depiction of a white building in an otherwise dark and murky scene is unrepresentative of the proposed development.

Site 5

- 3.9 PW's sketch fails to include the context especially the existence of the adjacent villas including Wren House, Two Furlongs and Cheltonian Place. Only part of the end villa is shown. It also fails to include existing trees within Site 5 along the Portsmouth Road frontage and has a solid white wall along the frontage, which is not proposed. The proposed buildings have in the planning application and DAS been deliberately been set back behind these mature trees, unlike they appear in Mr Whicheloe's representation and views through perimeter fencing could be possible, opening up the views from Portsmouth Road.

Site B

- 3.10 This view presented by PW is also unrepresentative as it is taken from a gap between trees without regard to context. The proposed hotel would appear behind trees on Portsmouth Road for the most part and adjacent to or against the grandstand and Eclipse building within a landscaped setting. In order to give the site and view of the building context, screenshots of views when travelling along Portsmouth Road are in **Appendix EDP 2**. A modern high-quality hotel building in this location would be a landmark building complementing the existing grandstand and Eclipse buildings and an enhancement to this part of Esher and the townscape.

4. Conclusions

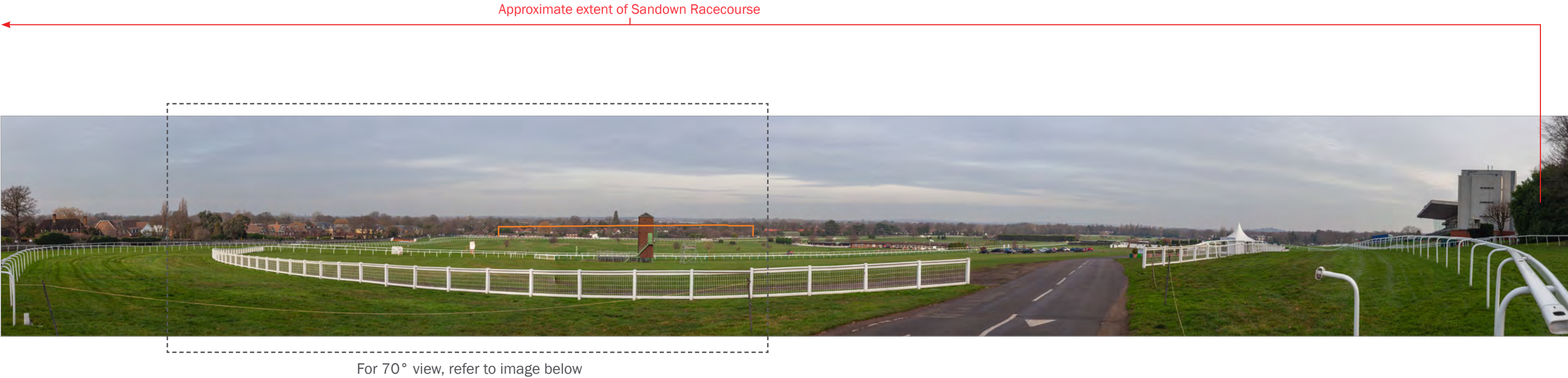
- 4.1 I have reviewed my evidence in the light of PW's evidence and have reached the same conclusions as those contained in the Landscape/Townscape and Visual Appraisal (LTVA) and my proof of evidence.
- 4.2 Following my review of PW's visualisations, I do not accept that the representations are accurate in terms of the representation of the form of the buildings as they would appear in reality. They would not be viewed as depicted in the sketches as white masses and it is noted that both retained and proposed landscaping, as well as a consideration of the character of the local context, is absent.
- 4.3 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

Photoviewpoint EDP 3 – Development Proposals Illustratively Modelled Using Google Earth
(edp5237_d026a 11 November 2020 VP/BC)

Photoviewpoint EDP 3: View taken from Racecourse access road on higher ground within the south-western areas of the Racecourse, looking north



BC Interpretation of proposed built form height. The proposed development shown has been interpreted from model imagery obtained from Google Earth Pro (a freely available source). Google Earth rounds to the nearest metre and, as such, the development parameters shown are (based on the illustrative masterplan):

Site 3 – Ground Floor Level: 14m aOD (13.7m stated within the DAS). Proposed heights are 1 storey: 3m. 3 storey: 10m.





BC Interpretation of proposed built form height. The proposed development shown has been interpreted from model imagery obtained from Google Earth Pro (a freely available source). Google Earth rounds to the nearest metre and, as such, the development parameters shown are (based on the illustrative masterplan):

Site 1 – Ground Floor Level: 40m aOD (39.8m stated within the DAS). Proposed heights are 1 storey: 3m. 2 storey: 7m. 3 storey: 10m.



Photoviewpoint EDP 6: View taken from central Esher (Portsmouth Road), looking north



BC Interpretation of proposed built form height. The proposed development shown has been interpreted from model imagery obtained from Google Earth Pro (a freely available source). Google Earth rounds to the nearest metre and, as such, the development parameters shown are (based on the illustrative masterplan):

Site 2 – Ground Floor Level: 31m aOD (31.0m stated within the DAS). Proposed heights are 1 storey: 3m. 3 storey: 10m. 4 storey: 13m.



Approximate extent of Sandown Racecourse



For 70° view, refer to image below

BC Interpretation of proposed built form height. The proposed development shown has been interpreted from model imagery obtained from Google Earth Pro (a freely available source). Google Earth rounds to the nearest metre and, as such, the development parameters shown are (based on the illustrative masterplan):

Site 5 – Ground Floor Level: 18m aOD (18m stated within the DAS). Proposed heights are 2 storey: 7m. 3 storey: 10m. 4 storey: 13m.





BC Interpretation of proposed built form height. The proposed development shown has been interpreted from model imagery obtained from Google Earth Pro (a freely available source). Google Earth rounds to the nearest metre and, as such, the development parameters shown are (based on the illustrative masterplan):

Site 4 – Ground Floor Level: 13m aOD (13.3m stated within the DAS). Proposed heights are 4 storey: 13m. 5 storey: 16m. 6 storey: 19m.



Approximate extent of Sandown Racecourse



For 70° view, refer to image below

BC Interpretation of proposed built form height. The proposed development shown has been interpreted from model imagery obtained from Google Earth Pro (a freely available source). Google Earth rounds to the nearest metre and, as such, the development parameters shown are (based on the illustrative masterplan):

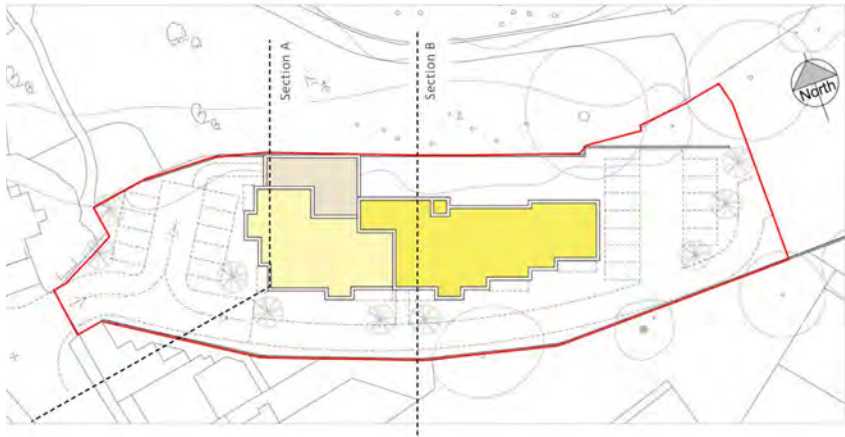
Site B – Ground Floor Level: 26m aOD (26m stated within the DAS). Proposed heights are 2 storey: 7m. 6 storey: 19m.





Appendix EDP 2
Google Street View Viewpoints
(edp5237_d025a 11 November 2020 VP/BC)

Site 1 (Photoviewpoint 5): View taken from Esher Green, looking north-east



KEY

- APPLICATION SITE BOUNDARY
- 1 STOREY
- 2 STOREYS
- 3 STOREYS

Google Views:

Views have been recorded as close as possible to the locations presented by Mr Whicheloe of the Sandown Park Appeal Group. Views are shown as 2m above ground level (as above, Google Earth Pro rounds to the nearest metre). The proposed development shown has been interpreted from model imagery obtained from Google Earth Pro (a freely available source). Google Earth rounds to the nearest metre and, as such, the development parameters shown are (based on the illustrative masterplan):

Site 1 – Ground Floor Level: 40m aOD (39.8m stated within the DAS). Proposed heights are 1 storey: 3m. 2 storey: 7m. 3 storey: 10m.

Google Street View images as captured by Google Earth - 10m built form modelled relative to existing ground levels.



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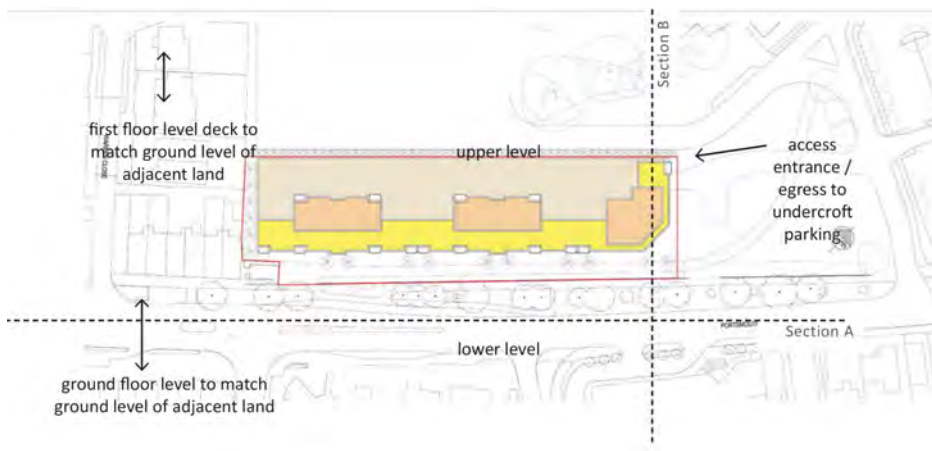
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11 NOVEMBER 2020
edp5237_d025a
VP
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client
project title
drawing title

The Jockey Club Racecourses Ltd
Sandown Park Racecourse, Esher
Google Street View Viewpoints

Site 2 (Photoviewpoint 6): View taken from central Esher (Portsmouth Road), looking north



KEY	
	APPLICATION SITE BOUNDARY
	1 STOREY
	3 STOREYS
	4 STOREYS

Google Views:

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Site 2 – Ground Floor Level: 31m aOD (31.0m stated within the DAS). Proposed heights are 1 storey: 3m. 3 storey: 10m. 4 storey: 13m.

Google Street View images as captured by Google Earth - 10m built form modelled relative to existing ground levels.



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Site 3 (Photoviewpoint 3): View taken from Racecourse access road on higher ground within the south-western areas of the Racecourse, looking north



KEY

- APPLICATION SITE BOUNDARY
- 1 STOREY
- 3 STOREYS

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Site 3 – Ground Floor Level: 14m aOD (13.7m stated within the DAS). Proposed heights are 1 storey: 3m. 3 storey: 10m.

Google Street View images as captured by Google Earth - 10m built form modelled relative to existing ground levels.

Site 4 (Photoviewpoint 9): View taken from Littleworth Common, looking north-west



KEY	
	APPLICATION SITE BOUNDARY
	4 STOREYS
	5 STOREYS
	6 STOREYS

Google Views:

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Site 4 – Ground Floor Level: 13m aOD (13.3m stated within the DAS). Proposed heights are 4 storey: 13m. 5 storey: 16m. 6 storey: 19m.

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Sandown Park Racecourse, Esher
Google Street View Viewpoints

Site 5 (Photoviewpoint 8): View taken from Portsmouth Road, on approach to Esher, looking north-west



KEY	
	APPLICATION SITE BOUNDARY
	1 STOREY
	2 STOREYS
	3 STOREYS
	4 STOREYS

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Site 5 – Ground Floor Level: 18m aOD (18m stated within the DAS). Proposed heights are 2 storey: 7m. 3 storey: 10m. 4 storey: 13m.

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Site B (Photoviewpoint 6): View taken from central Esher (Portsmouth Road), looking north



Google Views:

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Site B – Ground Floor Level: 26m aOD (26m stated within the DAS). Proposed heights are 2 storey: 7m. 6 storey: 19m.

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