

SPAG/PoE/OCT'2020

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

**SANDOWN PARK APPEAL GROUP**  
**Proofs of Evidence**

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

**SCOPE OF EVIDENCE:**

Graphic exploration of the visual impact of the proposals.

1:1 PW will reference his evidence to support REASON:2 of the 2019/0551 Refusal Notice which asserts it has not been demonstrated that 'the level of residential development and hotel proposed could be designed without resulting in an adverse impact on the character of the area'.

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

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

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

1:3 Four out of the six main sites will be portrayed:

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

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

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

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

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

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

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

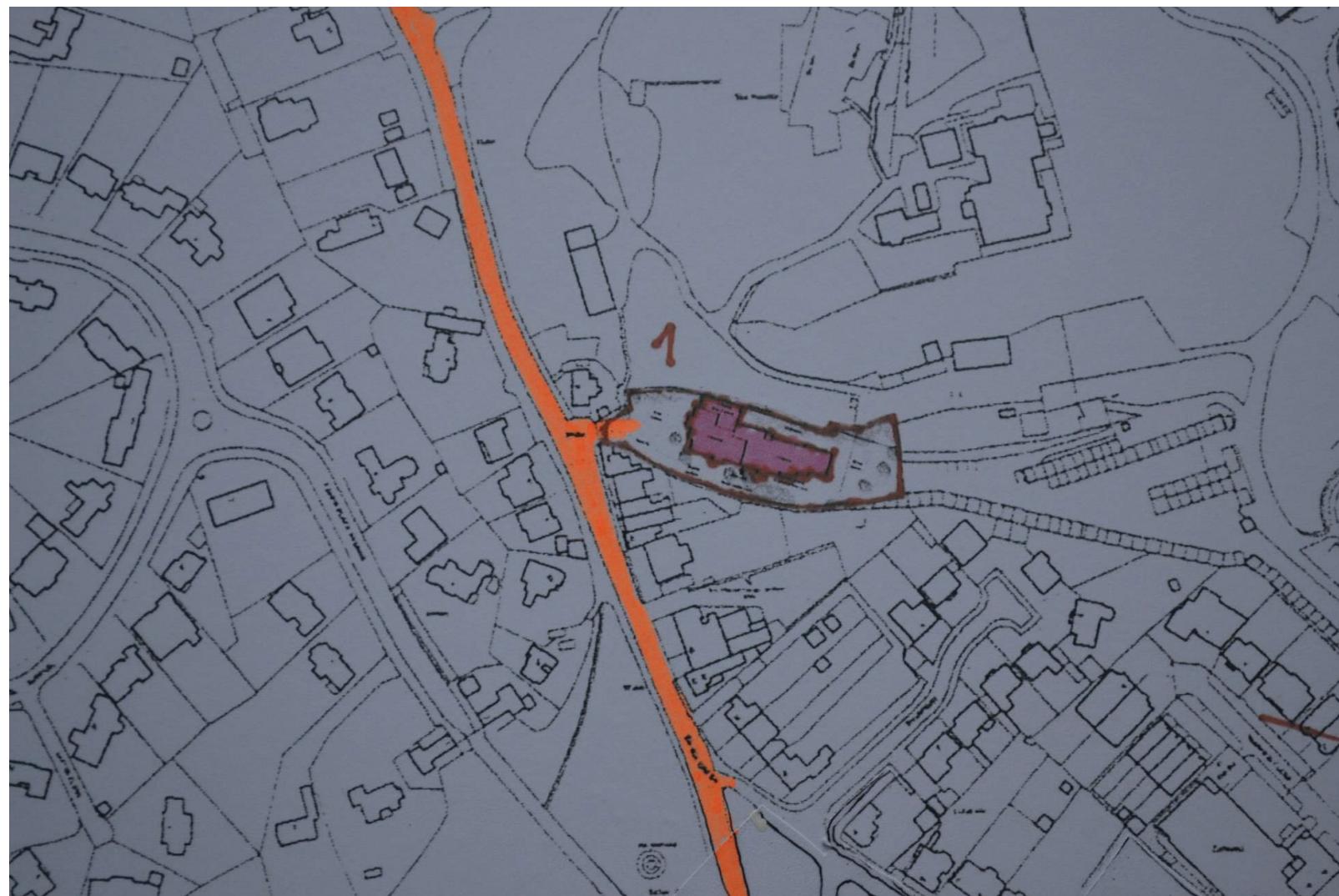
The assembled series of prints forms the backdrop- often creating A0 size boards- and the montage can be commenced.

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

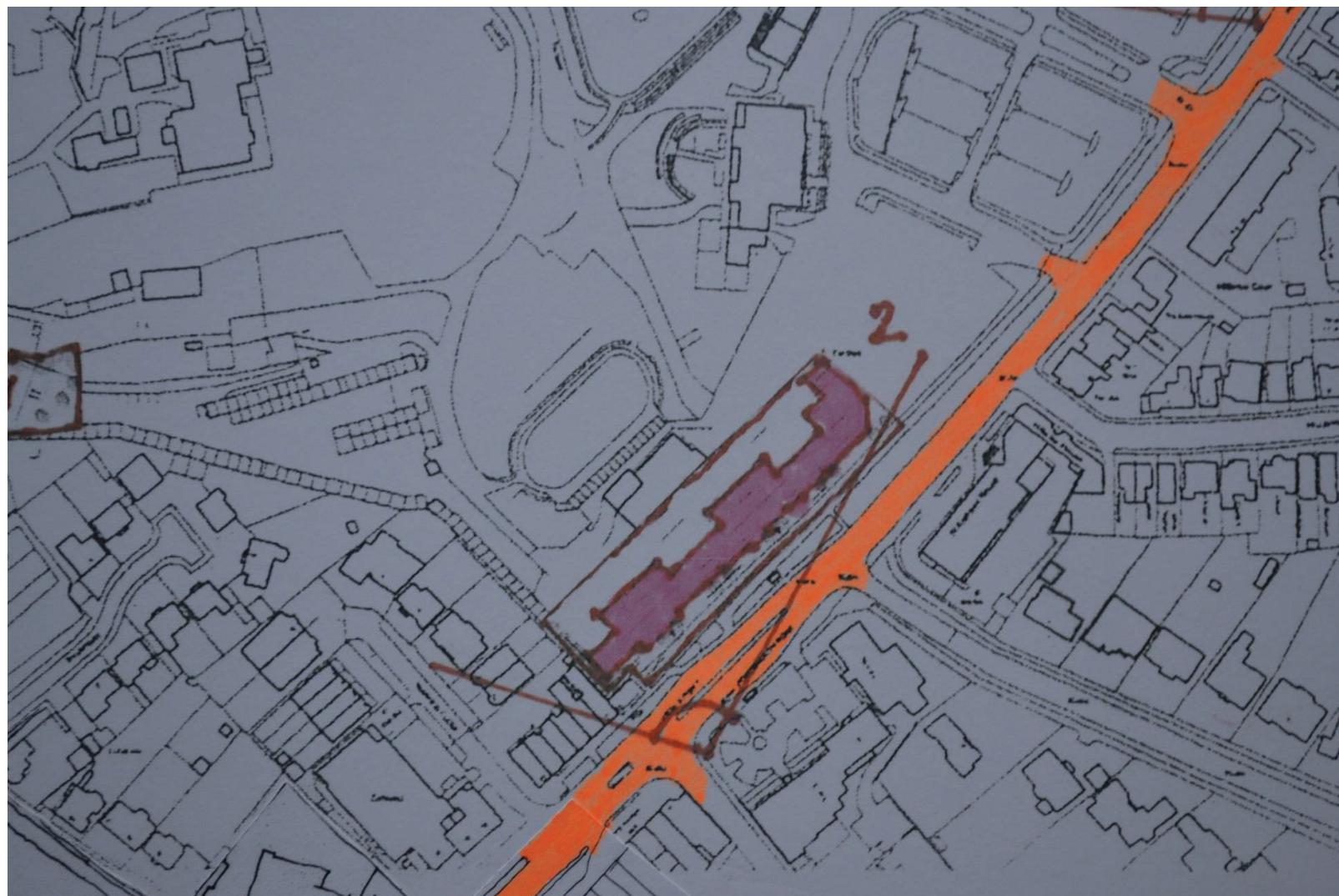
With a viewpoint accurately confirmed on the plan the proposal can be plotted with careful reference to heights taken in the field to complete the three-dimensional grid in perspective into which the proposal can be drawn.



OVERALL LOCATION PLAN, DEVELOPMENT SITES AND IMMEDIATE ROAD NETWORK



SITE 1 CONTEXT



SITE 2 CONTEXT



SITE 3 CONTEXT



SITE 3 DISTANT VISUALISATION



SITE 3 DETAILED VISUALISATION



SITE 4 CONTEXT



SITE 4 VISUALISATION



SITE 5 CONTEXT



SITE 5 VISUALISATION



SITE B CONTEXT



SITE B VISUALISATION

## **2:0 Witness HUW THOMAS MRICS Local Chartered Building Surveyor**

### **SCOPE OF EVIDENCE**

Photographic exploration of the existing immediate Highway Network.

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

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

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

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

2:5 As stated in the SPAG statement of case, it is anticipated that the net impact of journeys to and from the proposed development at the Appeal site, will realistically be by car.

2:6 The principal adopted for the sequential depiction of the road network surrounding the Appeal site is simply that the photographic sequences are generated from the options available to the residents of the proposed apartments or hotel as they DEPART each site and assumes that return journeys, which could be from anywhere, will ultimately encounter previously identified configuration and conditions.

SITE 1:

A : option southbound towards Esher town centre.

- i) Left turn onto Esher Green at the top of More Lane – narrow carriageway with parked cars and often restricted to single file.
- ii) Immediately approach accident black spot junction with A244 and hybrid one-way system: no right turn onto Lammas Lane A244 westbound. no entry to Church Street (one way) ahead.
- iii) Left turn onto short extension of Esher Green (one way) offering lane choice for traffic -light controlled junction with Portsmouth Road (A307) north or southbound. Lanes often grid-locked at morning and evening rush hours.
- iv) Right turn choice (2 lanes at junction) onto Portsmouth Road (A307) southbound with various options available.
- v) Remain on inside lane and filter left on slip-road to turn left onto Claremont Lane (A244) southbound for access to A3 (Esher Bypass), M25 junction 9, and A24.
- vi) Remain on Portsmouth Road (A307) to 3 phase traffic light junction with A244 and proceed south on A307 to Esher Waitrose, Cobham, the A3 and M25 junction 10.
- vii) Remain on inside lane and filter left on slip-road going to middle lane as traffic allows and 3phase traffic light junction with A244 to turn right onto Church Street (A244 north bound) one way with pedestrian traffic light before turning left onto Lammas Lane (A244) to proceed west to Walton upon Thames, Weybridge and the M3. As the A244 cuts back across the Portsmouth Road (A307) there are further traffic lights at this junction which during morning and evening rush hours and race days can create a central grid lock when north bound traffic on the Portsmouth Road is at a standstill and it is joined by incoming traffic from the A244.
- viii) Take outside lane onto Portsmouth Road (A307) as if travelling south, then cross lanes to the outer lane of the slip road, traffic permitting, to turn right and right again to travel north back along the Portsmouth

Road in the opposite direction in order to reach the slip road to retail units on the central 'island' of north side of Esher High Street (Portsmouth Road).

- ix) Left turn choice after 1:A: (iii) northbound on Portsmouth Road (A307)
- x) Portsmouth Road 2 lanes past cinema immediately reduced to one lane with right turn to Civic Centre, then continuing north as one lane to Scilly Isles, Kingston and London-follow SITE:2 B option.

B : option northbound towards Lower Green.

- i) Right turn down More Lane with poor sight line against on-coming traffic.
- ii) Emerging traffic from right of racecourse activities including golf driving range and course, go-kart track, ski slope and gym.
- iii) Lanes narrowed with pedestrian islands as part of traffic management for Esher Green Surgery access on left after School.
- iv) Morning and afternoon school-run traffic to Esher High School-large comprehensive – involving multiple coach movements and parking on highway by parents.
- v) Considerable existing residential traffic from backland development in small close form between the lane and Esher High School grounds.
- vi) Blind sweeping bend on to Lower Green Road with two junctions on the bend from Lower Green Industrial Estate, Water Works and an extensive residential estate.
- vii) Continue east along Lower Green Road which effectively becomes single lane with parked cars on north side Adjacent to residential ribbon prior to railway bridge. This route popular alternative to central Esher, with additional traffic from Cranmere Primary School.
- viii) Single file traffic only under railway bridge taking main line London-Portsmouth.-Traffic often subject to long queues.

- ix) Lower Green Road continues through to junction with Station Road (B3379) remaining effectively single lane with parked cars and houses on both sides of the road.
- x) Left turn option at junction along Ember Lane used as back way to Hampton Court.
- xi) Right turn along Station Road southbound to Esher Rail station, where exit from station carpark towards towards Portsmouth Road narrowed with island to single lane priority traffic.
- xii) Continue to junction with Portsmouth Road- 3-phase traffic lights and pedestrian crossing traffic lights with options north and southbound, both often grid-locked at morning and evening rush-hours.
- xiii) Left turn choice on to A307, offering options at Scilly Isles roundabout, often grid-locked itself, for Hampton Court, Kingston, the A3 via A309 to London. No option to Guildford via Kingston/Esher by-pass.
- xiv) Right turn choice on to Portsmouth Road through to traffic lights at Civic Centre. Due to congestion in central Esher with multiple traffic light controls this entire section is mostly nose-to-tail from the Scilly Isles to the High Street, fed by traffic from the Kingston by-pass (A309) Then see Site:1 A (iv)

#### SITE: 2

A : option south bound along Esher High Street (A307)

- i) Unclear whether this right turn from either of the main exits from the racecourse will be acceptable in highway terms for the added development as there is an existing right turn lane for northbound traffic entering the racecourse and no site line from the preceding exit. If this is viable follow SITE :1 A (iv) after traffic lights at junction with Civic Centre access road and adjoining pedestrian lights.

SITE: 2

B : option northbound towards Scilly Isles

- i) Join single lane traffic along Portsmouth Road down to traffic lights at Station Road junction; traffic queuing entire length at most times of day.
- ii) Then follow SITE :1 B (xiii)

SITE: 3

A option west then southbound towards Esher town centre

- i) Turn left following More Lane from Lower Green Road rising to Esher Green with noted congestion from Esher High School and with access to racecourse leisure activities before continuing to follow SITE :1 A (i)

B : option eastbound towards Station Road.

- i) Turn right and follow SITE :1 B (vii)

SITE : 4

A: option northbound towards Esher Station.

- i) Turn left along Station Road to single lane restriction at junction with station carpark then access set-down and parking for trains to London and Portsmouth.
- ii) Continue under railway bridge to junction with Lower Green Road then follow SITE :1 B (x)

B option southbound on to Portsmouth Road

- i) Turn right then follow SITE 1 B (xii)

SITE: 5

A : option northbound towards Scilly Isles

- i) Turn left onto Portsmouth Road then follow SITE:2 B (i) then SITE : 1 B (xiii)

SITE: 5

B : option southbound towards Esher town centre

- i) Turn right onto Portsmouth Road then follow SITE:1 B (xiv)

SITE: B

A : option northbound towards Scilly Isles

- i) Turn left from main Racecourse access on to Portsmouth Road then follow SITE : 2 B (i)

B : option southbound towards Esher town centre

- i) Turn right on to Portsmouth Road then follow SITE : 2 A (i).

Photographic example of road layout encountered in exiting SITE 1 A : option southbound towards Esher town centre.



- i) Left turn onto Esher Green from Site 1 at the top of More Lane – narrow carriageway with parked cars and often restricted to single file.



- ii) Immediately approach accident black spot junction with A244 and hybrid one-way system: no right turn onto Lammas Lane A244 westbound. No entry to Church Street (one way) ahead.



View from Church Street



iii) Left turn onto short extension of Esher Green (one way) offering lane choice for traffic-light controlled junction with Portsmouth Road (A307) north or southbound. Lanes often gridlocked at morning and evening rush hours.



Exit from Esher Green (one way)



iv) Right turn choice (2 lanes at junction) onto Portsmouth Road (A307) southbound with various options available.





- v) Remain on inside lane and filter left on slip-road to turn left onto Claremont Lane (A244) southbound for access to A3 (Esher Bypass), M25 junction 9, and A24





vi) Remain on Portsmouth Road (A307) to 3 phase traffic light junction with A244 and proceed south on A307 to Esher Waitrose, Cobham, the A3 and M25 junction 10.





vii) Remain on inside lane and filter left on slip-road going to middle lane as traffic allows and 3 phase traffic light junction with A244 to turn right onto Church Street (A244 north bound) one way with pedestrian traffic light before turning left onto Lammas Lane (A244) to proceed west to Walton upon Thames, Weybridge and the M3. As the A244 cuts back across the Portsmouth Road (A307) there are further traffic lights at this junction which during morning and evening rush hours and race days can create a central grid lock when north bound traffic on the Portsmouth Road is at a standstill and it is joined by incoming traffic from the A244.



Church Street looking back to Portsmouth Road (A307)





Church Street exit onto Lammas Lane



viii) Take outside lane onto Portsmouth Road (A307) as if travelling south, then cross lanes to the outer lane of the slip road, traffic permitting, to turn right and right again to travel north back along the Portsmouth Road in the opposite direction in order to reach the slip road to retail units on the central 'island' of north side of Esher High Street (Portsmouth Road).





First slip entry travelling north



Second slip entry travelling north



ix) Left turn choice after 1:A: (iii)  
northbound on Portsmouth Road  
(A307)



Southbound view back to junction  
at 1:A: (iii)



Northbound view towards  
Sandown Park main entrance

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

#### **SCOPE OF EVIDENCE**

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

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

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