

**From:** Peter Whicheloe <pwhicheloe@gmail.com>  
**Sent:** 01 December 2020 13:16  
**To:** Dyson, Alison  
**Subject:** Fwd: SPAG closing Submission

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From: **Peter Whicheloe** <[pwhicheloe@gmail.com](mailto:pwhicheloe@gmail.com)>  
Date: Tue, Dec 1, 2020 at 8:37 AM  
Subject: SPAG closing Submission  
To: Huw Thomas <[HThomas@treharne-bcl.co.uk](mailto:HThomas@treharne-bcl.co.uk)>

The Sandown Park Appeal Group have battled consistently during the Inquiry to bring a degree of reality to planning considerations that the Appellant would rather remain conceptual.

Indeed, as the Appellant's case has unfolded, it became clear that they may ultimately rely upon making a case for 'very special circumstances' as the final conceptual gambit in an argument that has looked unconvincing in reality. The reliance upon a 'modal shift' in the proposal's transport patterns was a conceptual aspiration challenged by the Group.

It assumed that new residents would walk or take public transport rather than the car, theoretically 'mitigating' any impact on local traffic.

The Group's scheduled assessment of the local road network indicated that existing patterns did not reflect this concept, nor support its credibility. The reality of significant additional traffic generated by the development was judged not only to compound local congestion and physical constrictions, but cause demonstrable harm to the highway network.

The Appellant sought to further test the bounds of credibility with the proposition of six and seven storey monumental built form in the Green Belt, and, as if to deny their inevitable prominence, make no attempt to address their visual impact, nor confront their reality in the local context.

One assumes the purpose of this approach was designed to provide a 'conceptual aura' to these landscape-changing constructions: indeed the most outrageous of the offerings were so conceptual that they were interchangeably described as either 'landmark' or 'gateway' contributions, or capable of completely disappearing within the landscape- it just depended upon who and where that person was standing.

The Group sought to depict the reality of these architectural ghosts, and to present the only rendered images of the proposals to the Inquiry. It is perhaps ironic that wireframe outlines, constructed only a week before the beginning of the Inquiry, seem only to validate the accuracy of the Group's images, whilst bemoaning the fact that they resemble real buildings.

Finally, it would seem essential that any factors that feed into the concept of a 'very special circumstances' case should rightly be material planning considerations.

The Group questioned the Appellant's application of this concept in that it appears to be advancing their personal financial circumstances as material to the planning application and its consideration. It is suggested that not only are the Appellant's financial circumstances not a relevant planning consideration and not an obligation of the planning system, but that the development proposed as a mechanism to generate a revenue stream to support investment at Sandown Park, should fairly and reasonably relate to the character and use of the land.

The proposed built development clearly has no connection with the racecourse, and beyond the sport of horseracing and the opportunity to bet on it's outcomes, offers no 'very special circumstances beyond the benefits to the racing community.

In conclusion, it is suggested that the proposal is inappropriate development in the Green Belt, harmful to its purposes of openness and permanency, and falls short in the demonstration of any exceptional consideration. The concept by the Appellant that the proposed development would at least go unnoticed by race-goers to Sandown Park as they would, by nature, demonstrate a 'low sensitivity to such changes, may well need to be extended to an expensive fit-out of the grandstand.

Sandown Park, despite its use as a Racecourse, delivers a significant contribution as Green Belt, beyond any landscape designation and beyond its boundaries.

Peter Whicheloe  
for Sandown Park Appeal Group