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**By Email Only**

Dear Inspector,

## Epsom and Ewell Local Plan 2022 - 2040 Matter 10 – Employment and Horse Racing

CBRE Ltd is instructed on behalf of The Jockey Club Racecourse in respect of Epsom Downs Racecourse and Epsom Training Grounds. The Emerging Local Plan (SD02) currently has a Draft Policy (Policy DM8) which specifically relates to the Racehorse Training Industry, with the draft policy relating to Epsom Downs Racecourse and the Racehorse Training Zone. The wording of this policy has significant implications on the operation of the training grounds and the racecourse. We have provided a response to the relevant matters and questions set by the Inspector below.

### **Q12.9**

Should the policy make explicit reference to both existing and new facilities in line with the representations received? If not why not?

**Yes.** The Jockey Club strongly advocate the explicit reference to be made to new and existing facilities within the Racehorse Training Zone.

The protection of training facilities and thus the training zone is paramount to the Jockey Club and the future of the horse racing industry in Epsom. The recognition within policy to both existing and new facilities will future proof the industry in and allow development to attract new trainers which will support the viability of the training grounds.

The need for the support of the existing facilities is essential as the racecourse training industry at the Epsom Training Grounds and the surrounding area have undergone a prolonged period of decline. This is reflected in the number of operational training yards and the number of horses being trained, which has reduced by 16% in the last 16 years. This trend has continued since the 1970's when there were 520 horses in training compared to 143 horses currently in training. This current trend presents a significant challenge to the viability of the long-term sustainability of the Training Grounds. It is therefore key there is a robust policy in place that protects the existing facilities, including staff accommodation associated with training yards. The need for protection of existing facilities is recognised and supported within Section 9.0 of the Scoping Report on the Racecourse & Equestrian Sector in Epsom & Ewell Borough (EV09), which forms part of the evidence base for the Emerging Local Plan.

In terms of supporting the enhancement of existing facilities as well as new facilities, this is seen as key to the viability of the industry. It is vital that trainers are able to upgrade and extend their current facilities to allow them to adopt new technologies and / or training methods. This will allow trainers to provide a best in class programme which will attract new horses to the area. Trainers require policy support to upgrade their facilities in line with modern day standards. In the absence of policy support, this could lead to a gradual decline in the quality and attractiveness of facilities.

One of the key facilities that needs to be supported is ancillary staff accommodation, which is identified as an 'intervention to consider' within the Racecourse & Equestrian Sector in Epsom & Ewell Borough (EV09). This is due to the unaffordable nature of housing within the surrounding area and the need for trainers and yard staff to be accommodated onsite or nearby the operation. The policy as drafted is unclear if proposals for staff accommodation would be supported. However, The Jockey Club emphasise that staff accommodation should be **ancillary** to the training zone, and planning and legal mechanisms should be utilised to ensure the accommodation cannot be changed to market dwellings. Trainers also require policy support to upgrade their facilities in line with modern day welfare standards. In the absence of policy support, this could lead to a gradual decline in the quality and attractiveness of facilities

As set out, policy support should be provided for both new and existing facilities to ensure the viability of facilities though retaining and enhancing training facilities. To enable horse racing and training to continue to at the centre of the Borough's identity, as set out in Chapter 2 of the Emerging Local Plan (SD02), explicit support for the expansion of existing training facilities and supporting new facilities.

#### **Q12.10**

The Plan specifies that the objective of the Racehorse Training Zone is necessary given the nationally important racehorse training grounds which make a positive contribution to the economy and sporting heritage of the area ( paragraph 6.31) . In light of this, should the policy reference the need to support the delivery of key infrastructure to support the industry? If not why not?

**Yes, subject to conditions.** The Jockey Club support the identification and delivery of key infrastructure as part of the policy. However, this is subject to no stables being lost as part of the delivery of the infrastructure. The policy should not provide any flexibility to allow even one stable to be lost to deliver this. Specific wording to ensure this should be a condition of any development seeking to deliver key infrastructure related to racehorse training or the racecourse.

The Jockey Club significantly subsidises the delivery of large scale infrastructure improvements at the training centre to keep the facility viable. Without this investment the standard of the facilities would decline which would reduce the attractiveness of the training grounds to trainers. The Jockey Club are therefore keen for the policy context to support these works. However, as noted above this should not come at the loss of any stables.

#### **Q12.12**

In what way does policy DM8 reflect the conclusions of the evidence base, in particular Section 8 of EV09? Is it clear how the Council have utilised this evidence base to formulate the policy as currently drafted?

The Jockey Club are supportive of the recognition of the role Epsom Downs Racecourse and the horse racing training industry has in the Borough. They support the introduction of a Racehorse Training Zone which covers land to the north, south east and the west of their land ownership. They also support the addition of the Racecourse area which covers a significant portion of land within the Jockey Club's ownership.

The Jockey Club are broadly supportive of the interventions proposed within Section 8 of EV09 as well as Policy DM8 being informed by the conclusions of the report.

In reviewing the proposed interventions it is unclear how and if capital and inward investment have informed the policy. The Jockey Club support both initiatives to inform long-term viability of the Epsom Racecourse and the wider Training Zone. In relation to the racecourse area, as set out in our Regulation 19 representations, this could be supported through the proposed inclusion of non-racing development which could provide additional external income and investment for the racecourse. However, in respect to the training zone and the national significance of the training area, only in the event of satisfying the marketing evidence should non-training facilities be considered.

Overall, the Jockey Club are broadly supportive of Policy DM8; however, as set out in our Regulation 19 representations, we consider there are several modifications required to the policy to ensure it fully accords with Paragraph 38 of the National Planning Policy Framework, namely in respect to being positively prepared, justified and effective.. This includes adding support for suitable non-racing development solely in respect to the racecourse,

and the development of new training facilities such as staff accommodation. These suggested modifications are supported by document EV09 which forms part of the evidence base.

We would be grateful if you could confirm receipt of this submission.

**Kelly Lippett**

Associate Director – Planning

CBRE Limited for and on behalf of The Jockey Club Racecourse