16 November 2018

By email and post: localplanconsultation@southnorthants.gov.uk

Dear Sir/Madam

Local Plan Part 2 Draft Submission Regulation 19 Consultation
Towcester Racecourse

South Northamptonshire Council (SNC) is undertaking consultation on the Local Plan Part 2 Draft Submission Regulation 19 Consultation until 16 November 2018. These representations are prepared in response to the current consultation exercise and relate to land in our client’s ownership at Towcester Racecourse.

Background

The West Northamptonshire Joint Core Strategy (WNJCS) ‘Local Plan Part 1’ was adopted by SNC in December 2014. The WNJCS identified Towcester Racecourse as a significant regional sporting facility, an important feature of the town but is a much underused facility.

It was accepted that there is considerable potential for intensification of the site for leisure and tourism related development that will benefit the increasing population of town and as a major tourism attraction for the wider area.

As such, in discussions with the landowner a specific Policy was drafted and subsequently adopted in the WNJCS with the specific objectives of the racecourse to:

- Give long term protection to existing leisure and recreational facilities at Towcester Racecourse in the interest of amenity for residents and visitors to the area;
- To improve the range, quality and standard of provision of the leisure and tourism offer at the Racecourse to meet peoples needs; and
- To encourage greater participation by local residents in sport and recreation.

It was acknowledged that in addition to being a leisure and tourism facility, there were significant benefits from an employment perspective and to the local economy that could be further maximised.

It was also acknowledged that become more profitable and to secure the long term future the racecourse needed to generate additional sources of revenue. From this Policy T5 – Towcester Racecourse, on the following page, was prepared and subsequently adopted.
POLICY T5 - TOWCESTER RACECOURSE

PROPOSALS FOR THE INTENSIFICATION OF USES AT TOWCESTER RACECOURSE INVOLVING THE DEVELOPMENT OF ADDITIONAL LEISURE, RECREATIONAL, TOURISM AND EXHIBITION FACILITIES WILL BE SUPPORTED, SUBJECT TO PROPOSALS MEETING ALL OF THE FOLLOWING CRITERIA:

a) VEHICULAR ACCESS TO THE SITE SHALL BE FROM THE A5 USING EITHER OF THE TWO EXISTING ACCESS POINTS. A TRANSPORT ASSESSMENT WILL BE REQUIRED TO ENSURE THAT ANY INCREASE IN TRAFFIC GENERATION CAN BE SATISFACTORILY ACCOMMODATED;

b) ANY NEW BUILDINGS SHOULD BE BUILT IN CLOSE PROXIMITY TO EXISTING BUILDINGS AND IN A MANNER SYMPATHETIC TO THEIR EDGE OF TOWN LOCATION;

c) EXISTING FOOTPATHS SHOULD BE RETAINED;

d) APPROPRIATE LANDSCAPING SCHEMES WILL BE REQUIRED TO BE SUBMITTED AND APPROVED BY THE LOCAL PLANNING AUTHORITY AS PART OF ANY DEVELOPMENT PROPOSAL;

e) THE RACECOURSE LIES WITHIN THE REGISTERED PARK AND GARDEN OF EASTON NESTON AND ANY DEVELOPMENT PROPOSALS MUST NOT ADVERSELY AFFECT THE SIGNIFICANCE OF HERITAGE ASSETS, INCLUDING ARCHAEOLOGY, OR THEIR SETTINGS;

f) AN ARCHAEOLOGICAL ASSESSMENT OF THE SITE WILL BE UNDERTAKEN AND MITIGATION MEASURES IDENTIFIED;

g) THE PROVISION OF AN INTEGRATED TRANSPORT NETWORK WITH SUSTAINABLE TRANSPORT MODES INCLUDING ACCESS TO TOWCESTER TOWN CENTRE;

h) THE PROVISION OF SURFACE WATER MANAGEMENT AND FLOOD ATTENUATION SCHEMES; AND

i) SAFEGUARDING AND ENHANCEMENT OF TOWCESTER'S GREEN INFRASTRUCTURE NETWORK.

This was a useful starting point for the future plans of the racecourse and the joint working with SNC saw the development of a greyhound track at the racecourse. It was agreed that a site specific policy in the Part 2 of the Local Plan would help to develop the future direction of development at the racecourse and assist with the aims of Policy T5, providing further clarity and comfort to the landowner, market and investors.

In the Part 2A: Preferred options consultation drafts in January 2017 and September 2017 documents, provided a specific policy which allowed further expansion at the Racecourse. Draft proposals were being discussed with SNC that would further intensify the use of the racecourse, in line with these policies.

It was acknowledged that in addition to being a national centre for horse racing, the racecourse had also grown as a centre for greyhound racing and was now being widely used as a conference centre.

This proposed leisure and sports development accompanies the growth of the town and aims to strengthen the tourism offer of the District and its ability to draw increased visitor numbers to major sporting events at
the existing Towcester Racecourse (and Silverstone) and so generate additional employment in the entertainment and hospitality sector.

The site is well located on the A5 between Towcester and Milton Keynes, with public transport links and is within walking distance of the town centre. Development in this area provides an opportunity for high visibility economic investment, taking advantage of the improved access which the planned Towcester relief road will bring.

The Proposals discussed and the draft policy included the following key elements:

- Further enhancement of the existing horse/greyhound racing facilities including Animal Care/Events/Leisure (veterinary surgery, kennelling for the greyhound racing);
- New high-quality retail aimed at country sport, food and leisure uses to complement but not compete with historic Towcester and the town centre’s existing retailers;
- Sports/Leisure provision including new facilities for sports including for example dedicated gymnastics and squash facilities and a golf driving range;
- Hotel Development and
- Greenspace (landscaping and footpaths).

The draft policy is set out below;

**POLICY TOWCESTER EMPLOYMENT 2: Leisure and Sports Village at Towcester Racecourse**

Development Area: 38 hectares gross (including existing development)

Development Description: Located at the southern edge of Towcester in an important position adjoining the A5, this development site provides for mixed employment generating, multiuse leisure and sports facility extending the allocation made in the adopted Joint Core Strategy. A variety of employment types will be sought to reflect the need for diversity and resilience in the local economy as expressed in the Council’s Economic Growth Strategy. An integrated, coordinated and comprehensive planning approach will be taken for the employment site and a masterplan must be prepared, in consultation with the District Council, Northamptonshire County Council and other statutory undertakers prior to the submission of a planning application covering the development of the whole site.

Key land uses

- Further enhancement of the existing horse/greyhound racing facilities including an extended furlong to the east of the current horserace track and animal care including a veterinary surgery and kennelling for the greyhound racing);
- New small scale high quality retail associated with the Racecourse and aimed at country sport, food and leisure uses to complement historic Towcester and the town centre’s existing retailers. Any retail will be related to the sale of sports/country and leisure goods and not open A1 retail. This will be secured via a legal agreement;
- Sports/Leisure provision including new facilities for sports including for example dedicated gymnastics and squash facilities and a golf driving range
- Hotel Development
- A cinema
- Greenspace (landscaping and footpaths)
- Provision of a waste to energy plant
Access

- Access will be from existing access points to the Racecourse
- The existing listed boundary wall along the western boundary of the Racecourse with the A5 to remain intact

Key site specific design and place shaping principles:

- Provision of new footpaths and cycleways that link to existing networks including to the Watermeadows land;
- Good accessibility to public transport services should be provided for including contributions to the cost of establishing bus services including stops to the site, to help reduce over-dependence on the car and consequent congestion on the road network;
- A transport assessment and travel plan will be required to assess the transportation implications of the proposed development and to identify appropriate mitigation measures;
- A high quality design and finish, with careful consideration given to layout, heights of buildings, architecture, materials and colourings to reduce overall visual impact, particularly with landscape planting to reduce the impact of the development on the Historic Park and Garden;
- The height of buildings to reflect the existing buildings on the racecourse site.
- A comprehensive landscaping scheme including on-site provision to enhance the setting of the new buildings and to limit visual intrusion into the wider landscape together with appropriate planting of vegetation along strategic route ways to screen the noise. The layout will, where possible, be expected to retain and enhance any significant landscape features which are or may be of ecological value; and where possible introduces new features;
- Detailed consideration of ecological impacts, wildlife mitigation and the creation, restoration and enhancement of wildlife corridors to preserve and enhance biodiversity. Ecological Surveys to accompany any development proposal;
- Detailed consideration of any archaeological impacts including the need to record and preserve findings ahead of any development, together with a programme of archaeological mitigation;
- Detailed consideration of any impacts on designated and non designated heritage assets including a programme of mitigation;
- Provision of appropriate lighting and the minimisation of light pollution based on appropriate technical assessment
- Demonstration of climate change mitigation and adaptation measures including a Strategic Flood Risk Assessment for the site and use of Sustainable urban drainage techniques in accordance with Policies BN7 and BN7A of the WNJCS
- A detailed survey of the agricultural land quality identifying the best and most versatile agricultural land and a soil management plan;
- Appropriate financial contributions to mitigate the impact of the development on services and facilities as required by the Council’s policies
Draft Submission – Regulation 19 Consultation

Despite the extensive dialogue and progression with plans in line with the draft policy, this current Regulation 19 consultation document has been removed without any dialogue with the landowner. It would appear that the approach taken has been to rely on Policy T5 of the WNJCS. This is contrary to the agreed position with SNC and the work that has been undertaken over the last 4 years since the adoption of the Core Strategy.

Given the recent position that the racecourse has found itself in, with administration, the need for such a supportive policy is more justified than it was previously.

It is understood from subsequent discussions with Officers at SNC that there was concern expressed from Historic England that the proposal would have a harmful impact on the Grade II* Listed Historic Park and Garden at Easton Neston.

The plan was continuing to be developed and heritage was a priority issue that was clearly a key part of any future plans. This would not prevent development on all or parts of the draft allocation, and as with any such proposals would be considered as part of the pre-application process, particularly as most of the site was to the east of the existing Racecourse infrastructure, sited primarily beyond the boundaries of the historic park and gardens designation.

At the very least it would have been expected that a meaningful dialogue between all stakeholders would have sought to address these concerns.

The current approach of dropping the policy from the Local Plan is not as set out in Paragraph 16 of the NPPF which states that Plans should,

**b. “be prepared positively, in a way that is aspirational but deliverable.”**

It also appears that at this stage of the process the Council have ignored the advocated approach also set out in Para 16 of the NPPF which states that Plans should.

**c. “be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and statutory consultees.”**

These points seem to have been ongoing during the plan drafting but have now been overtaken by a need to rush an early submission of the Plan in January.

Further dialogue in the manner advocated in the NPPF would have enabled a positive approach to address any concerns and aim to meet the original aspirations of the T2 policy. Such an approach would have provided clarity on land uses at the site and provide sufficient comfort to SNC and the local community, that the full sports, tourism and leisure needs of Towcester and the surrounding District could be accommodated and delivered at the Racecourse.

This is also contrary to the advice in Paragraph 28 of the NPPF which states that;

“Non strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies.”
The removal of the site specific policy for the Racecourse is contrary to this advice.

The lack of a more detailed policy with greater clarity is essential to ensure the future of the Racecourse as a leisure venue of benefit to the town, District and wider area.

**Current position and Conclusions**

The Council have for a number of years supported the further expansion and intensification of leisure and tourism uses at Towcester Racecourse. Policy T5 of the WNJCS was the starting point for more detailed policies and plans that would provide a vision and framework of how the Racecourse site could be delivered.

This was considered helpful in discussions with operators and the ability to secure investment as it provides greater clarity around land use and ability to complement the racecourse.

Given that the racecourse has recently been in administration the need for this certainty and clarity is more acute and compelling than ever. The policy basis has evolved but it provided comfort that the expansion of the facilities would be supported. The nature of some of the proposed uses has also changed but the primary focus remains on tourism and leisure operations that complement the core business of the racecourse.

This is fundamental to the future of the racecourse and any areas of concern, around retail, highways or heritage should be reconsidered at this stage. A positive approach as advocated by NPPF would result in dialogue and potentially revised wording or land uses which all parties felt were appropriate.

We would suggest that this is the approach that is undertaken and upon resolution of matters on this important site, further consultation is undertaken prior to submission of the Local Plan for Examination.

The approach being taken to this site prior to the publication of the Reg 19 Consultation document was proactive, positive and with engagement, all of which is advocated by the NPPF. The approach being taken to remove this policy flies in the face of the 4 years of positive engagement at a time when the racecourse needs the support and positive engagement more than ever.

Yours faithfully

Richard Walters
Director