

Main Statement of Case Appendix 2

JCR STATEMENT OF CASE BY JOCKEY CLUB RACECOURSES

Planning Appeal by Jockey Club Racecourses (JCR) Ltd

JCR STATEMENT OF CASE

SANDOWN PARK RACECOURSE
PORTSMOUTH ROAD
ESHER

(LPA REF: 2019/0551)

25 March 2020

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1 INTRODUCTION

1.1 This Jockey Club Racecourses' ("JCR") Statement of Case has been submitted in support of an appeal (the "Appeal") against the refusal of planning permission for improvement works to, and facilitating development at, Sandown Park Racecourse (local authority reference: 2019/0551).

1.2 Contents:

- Background to The Jockey Club Group and JCR;
- JCR's Financial Position/Business Case;
- Sandown Park's need for improvement; and
- Conclusion.

2 THE JOCKEY CLUB GROUP AND JOCKEY CLUB RACECOURSES

THE JOCKEY CLUB GROUP AND THE CONTRIBUTION OF HORSERACING TO THE UK ECONOMY

2.1 The Jockey Club Group was founded in 1750 and is the largest commercial group in Britain's second-largest spectator sport, operating 15 racecourses nationwide, The National Stud, Jockey Club Estates, Jockey Club Catering, Jockey Club Live, Jockey Club Services and its charity, Racing Welfare.

2.2 The Jockey Club is governed by Royal Charter, and all of its profits are reinvested into British Racing to help the sport to thrive. Its mission is to act for the long-term good of British racing in everything it does. As confirmed in Appendix 4 (factual response) of the Post-Consultation Supplemental Statement (Core Document Ref CD6.47), no financial returns are made to private individuals, owners or shareholders.

2.3 The Jockey Club has been arguably the most influential body in racing over time including devising the rules of racing, laying down the handicap system for horseracing and until recently was the body responsible for the governance of the sport. Governance is now carried out by the British Horseracing Authority (BHA).

2.4 The BHA commissioned studies published in 2009 and 2013 entitled 'Economic Impact of British Horseracing' in conjunction with Deloitte¹ (Core Document CD3.43). The 2013 study found that horseracing generates over £3.45 billion for the UK economy, employs 17,400 full time equivalent (FTE) persons and over 22,000 individuals in full-time and part-time roles. These employees were a significant contributory factor in the £275+ million in tax generated by the sport.

2.5 The horseracing industry in the UK comprises many facets including thoroughbred breeding, training, jockeys and stable staff, owners, veterinary and farrier services, feed, fodder and equipment suppliers, transport services, hospitality and tourism, betting and gaming, television, radio, journalism and other forms of media, racecourse management and organisation, building and construction, insurance, legal and other professional services, as well as the 5.6m spectators who visit racecourses annually in the UK. In total more than 85,000 full-time jobs are helped by horseracing to be sustained in the British economy. It is also a significant contributor to the UK balance of payments with income generated abroad spent in the UK. British Racing is a major sport watched by millions of viewers on television every week as well as millions more abroad. It has more hours of free-to-air coverage than any other sport in the UK.

¹Economic Impact of British Racing 2013, Deloitte and British Horseracing Authority

- 2.6 Horses in training require racing to take place at a variety of courses so that the quality of the turf is of a continually high standard, and not overused or poached. They also require a substantial fixture list for competition for horses of different ages, abilities and qualities. Racing takes place in different parts of the country including in many rural areas. It is often the mainstay of the economy of such areas.
- 2.7 For courses such as Sandown which are in the south-east of England with easy access to a large catchment population including much of London, it is important to ensure a high quality of racing is provided so that the sport as a whole benefits with spin-off to the more minor racecourses which rely upon the bigger names such as Sandown to generate owner, trainer, sponsor, media and spectator attraction to the sport. For this to be achieved, continued investment is required in these racecourses and for their quality and attractiveness to be high.
- 2.8 Between 2008/09 and 2012/13 there was a 30% fall in terms of income from betting on British Racing, a major generator of its financial support. The gross win from betting fell from £1+ billion recorded in the six years up to 2008/09 to £710 million in 2012/13, reflecting competition with other sports, lower margins and the now offshore location of virtually all major online betting operations.
- 2.9 Top level sport now transcends national borders. The heritage and reputation of British Racing means it continues to attract many of the world's top horses together with investment from an increasingly diverse set of major international partners. International owners have a choice where to invest in racing and this depends to a significant extent on the quality of racing fixtures, the quality of racecourses as well as the experience given on any race day. Their choice is whether to invest in British Racing or alternatively abroad in France, the Middle East, USA, Hong Kong or in Australia. Once international owners decide to go elsewhere, it is difficult to persuade them to return. For owners to be retained, there is a need for high quality racecourses as these attract high quality racing – they go hand in hand. Returns on expenditure through prize money to owners in the UK is low compared with other racing countries, so the quality of racing, the atmosphere and facilities at racecourses are all especially important factors to maximise where possible.
- 2.10 In order that British Racing in general and that at Sandown in particular is adequately funded, there is a necessity for increased revenue and profit to be generated by the racecourses themselves as they cannot rely on betting or other revenue to the same extent as they have done in past years. This necessity has at least in the short term and potentially over a longer period become even more acute in light of the consequences of coronavirus, with the requirement to close racecourses and cancel major events (including the Grand National) as a result.

JOCKEY CLUB RACECOURSES ('JCR')

- 2.11 JCR is part of The Jockey Club Group and, as stated in Paragraphs 3.1-3.2 of the Planning Statement (Core Document Ref: CD6.50), is the largest racecourse group in the UK by turnover and attendances, with a focus on hosting the highest quality Flat, Jump and All-Weather Track racing. It currently operates 15 racecourses in the UK, including internationally renowned courses at Cheltenham (home of the Cheltenham Gold Cup), Aintree (home of the Grand National), Epsom (home of the Derby) and Newmarket.
- 2.12 JCR is governed by Royal Charter and re-invests all of its profits into British Racing as a sport, which includes investment in the long-term development and enhancement of its racecourse facilities and venues. JCR recognises the need to operate an efficient and diverse business to secure its long-term future by delivering an offer of non-racing activities, to secure reinvestment in the enhancement and regeneration of its racing venues.

SANDOWN PARK RACECOURSE

- 2.13 As stated in Paragraphs 3.3-3.5 of the Planning Statement (Core Document CD6.50), Sandown Park Racecourse is a Dual Code Jump and Flat racing venue, owned and operated by JCR, and hosts 24 racing fixtures annually. The primary function of Sandown Park as a sporting venue and visitor attraction brings a range of economic and benefits – notably job creation - to the local economy:

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- The Racecourse attracts approximately 120,000 visitors to the 24 racing fixtures per annum (including Music Nights).
 - As one of JCR's regional hubs, Sandown Park employs 110 permanent staff through the year-round employment of administrative staff and other staff for the operation of race meetings.
 - In addition to the permanent staff, the Racecourse employs around 4,000 stewards, car park attendants, cleaners for race meeting operations, as well as 280 catering staff per meeting.
 - A wide range of training opportunities are offered by the Racecourse to its staff.
 - The Racecourse uses a variety of contractors and service providers for the operation of race meetings, events and maintenance.
- 2.14 The Racecourse generates a significant number of indirect jobs, for example in the racehorse training industry as well as many suppliers to the Racecourse based in the local area. A significant number of visitors are also attracted to Sandown Park each year through the hosting of non-racing events. It hosts approximately 300 complementary non-racing events such as concerts and music events, conferences, weddings, banqueting and public exhibitions, attracting between 118,000 to 128,000 visitors per annum.
- 2.15 Sandown plays an important part in the British horseracing calendar with racing taking place throughout the year. It hosts five Grade 1 jump races annually and one Grade 1 flat race, the internationally known Eclipse Stakes which is held in July. Sandown sits on relatively heavy soils and maintaining the quality of ground when operating both flat and jump racing is a challenge. Hence improvements are required to the course to ensure that the track in particular on the insides of bends next to the rails can be moved between fixtures so that it does not become overused or poached. This issue has been particularly prevalent over the 2019/2020 jump season with 3 out of the 8 days racing being abandoned due to unsuitable ground. A part of the planning application is for improvement to the racetrack itself.
- 2.16 The location of Sandown is of advantage to both racegoers as well as trainers, with good road communications for vehicles including horse boxes and with the adjacent Esher Station being directly accessed by rail from Waterloo in Central London. The course enjoys a large local catchment population within London and Surrey in particular. This is in contrast to a number of UK racecourses which are at the extremes of the country and difficult to reach by many trainers and spectators. They therefore do not have the opportunity to generate the income, provide the quality of competitive racing sought by owners and trainers or expect the numbers of spectators available to Sandown by reason of its location.
- 2.17 Nevertheless, not only has there been a significant fall in income generated by British Racing as a whole, Sandown has also found itself in competition with other sports, leisure activities and higher quality venues. The number of runners per race in flat racing has declined at Sandown over the past 10 years and it finds itself over a runner per race behind the industry average, indicating that owners and trainers are preferring to run horses at different meetings at other racecourses. There is a pressing need to reverse this trend.
- 2.18 Even though Sandown has current problems associated in particular with the quality of its buildings and offer for both the race-going public as well as owners and trainers involved in the horseracing industry who seek high quality facilities, it has a number of positive aspects upon which its future can build once the proposed development is completed. It is considered by racegoers to be a "good viewing track" with the ability to create a good atmosphere. These include, in addition, its size, location and proximity to Central London, with good transport links in particular by train. It also has the proud reputation of being a racecourse enjoyed by a total cross-section of society, young and old as well as family groups.
- 2.19 The planning proposals seek to build on these qualities so that Sandown will be able to function in the future as a fully inclusive, high quality open-air sport and leisure venue, with facilities and attractions specifically designed for all age groups. An example is the family zone included as part of the proposals. It will build on its reputation as a diversified leisure destination including open-air concerts held in the summer months by internationally well-known artists and bands. The proposals will also bring about

improvement of accessibility throughout the course for all visitors, in particular for elderly, disabled and mobility impaired persons.

- 2.20 In addition to all these benefits, a significant benefit will be that to racegoers and the horseracing industry as a whole by carrying out significant improvements and enhancements to the grandstand, forecourt, stables, associated stable staff accommodation as well as to the spectator areas, so that it will once again be a racecourse with high quality facilities.

SANDOWN PARK HISTORY

- 2.21 Sandown Park opened in 1875 and was one of the first courses to charge all for attending and the first with a permanent grandstand. Since its opening, the Site has evolved and grown. Major milestones are identified below:

- 2.22 Chronology:

- 1875 – Sandown Park opening as a racecourse which was developed as an entirely enclosed purpose built track. The boundary fence was erected to ensure an admission charge for spectators for the first time.
- 1973 – A new Grandstand was built to replace the buildings which existed since 1875. It was designed in such a way that it would be used for exhibitions, conferences and banqueting on non-race days.
- 2001 – A new building (Eclipse Building) was developed to replace the former Lawn Suite, which enhanced the Grandstand entrance, re-landscaping of the Portsmouth Road Car Park.

- 2.23 The relevant planning history is set out in detail in the SoCG. It is clear that the Racecourse site, and Appeal Sites, have been subject to a number of planning permission over the years. However, the context of the third party comments arising from the planning application relative to previous proposals for a hotel at the Racecourse site, the following commentary is offered.

- 2.24 Planning permission was originally granted in 2009 for a hotel on what is now the boundary between Site A and Site 2 (local authority reference: 2008/0729). The purpose of the hotel was two-fold:

- i) To meet the immediate and pressing need to provide additional overnight accommodation to serve demand from visitors to Esher and the surrounding area in Elmbridge and more widely in Surrey (a need that exists to this date), and
- ii) Sandown Park Racecourse's need to increase its income to off-set the high costs associated with running and maintaining a substantial sporting venue all year round, year on year.

- 2.25 This planning permission was renewed in 2011 (local authority reference: 2011/0811), and implemented in 2013 (as confirmed by lawful development certificate ref: 2014/2030), albeit the hotel building has not been completed.

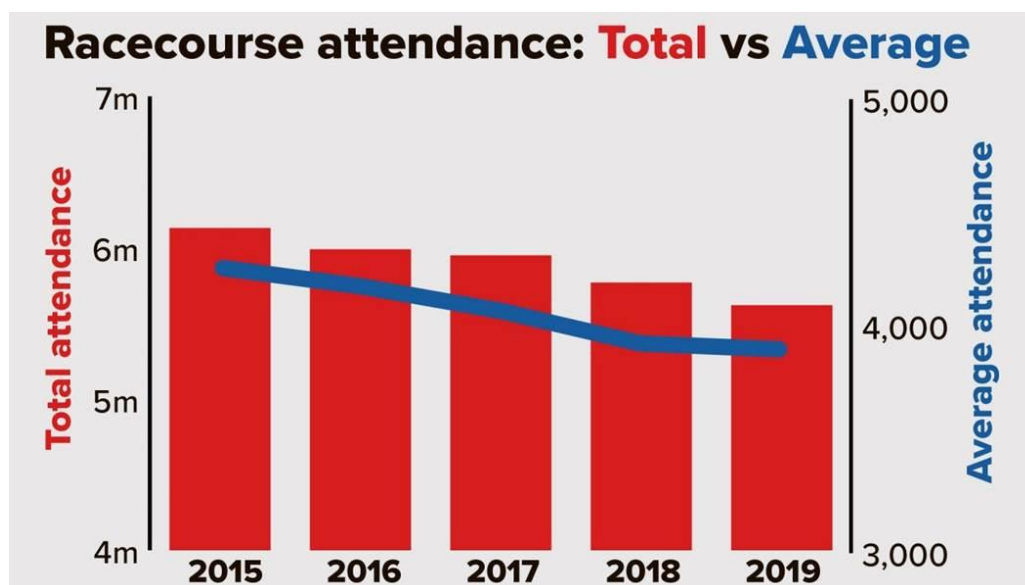
3 JCR FINANCIAL CONTEXT

- 3.1 As confirmed in Appendix 4 (Factual Response Summary) of the Post-Consultation Supplemental Statement (Core Document CD6.47) the net profit of the Jockey Club Group in financial year ending 2018 was merely £4.5m. This £4.5m has had to be invested nationwide across all of its 15 racecourses, training grounds, the National Stud and other facilities.

- 3.2 While day to day maintenance has taken place at Sandown Park in order to ensure its ongoing operation, it has not been possible to make a significant capital investment in the upgrade of Sandown Park since the last major upgrades involving the construction of Eclipse building and the main car park, completed in 2001. The major upgrades completed in 2001 were in response to the tired and dilapidated facilities as they were when JCR acquired Sandown Park in 1994. The significant capital investment at the time was expected to generate an annual return, although the actual annual return was less than 2%, which made it unsustainable and difficult to justify further capital expenditure.

- 3.3 Further, the British Horseracing industry was subject to the effect of two detrimental underlying trends: a collapse in horseracing's media rights values and an industry-wide decline in racecourse attendance. In 2003, the value of Sandown Park's media rights was approaching £1m but in 2007 it was virtually £nil. Over the same period, there was a 10% decline in public attendance at UK racecourses including Sandown Park. The declining trend in attendance has continued across the racing industry. Research by Racing Post (see graph 1 below) shows that a total of 5.62 million people went to racing in 2019, which is down from 5.77 million in 2018, which itself was a decrease from the 5.95 million in 2017, 5.99 million in 2016 and 6.13million in 2015.

Graph 1: Racecourse attendance (Source: Racing Post)



- 3.4 Planning permission was granted in 2008 for a hotel, the purpose of which was to meet the immediate and pressing need to serve demand from visitors to Esher and for Sandown Park's need to increase its income to off-set the high costs associated with running and maintaining a substantial sporting venue. However, and not least due to economic conditions as a result of the 2008 economic downturn in the UK, it was not possible to progress with the hotel proposal. The time limit for implementation of the 2008 consent was extended, and work commenced (and as such the planning permissions were formally implemented), the hotel was not built out for a wide ranging reasons as stated in JCR Vision Paper (Appendix 5 of the Post-Submission Supplemental Statement – Core Document CD6.47). This includes:
- Only one party was interested in occupying the consented hotel and the offer made would not have been sufficient to provide the required funding envisaged at the time of the planning applications and the level of offer reflected poor economic conditions at the time;
 - In retrospect, the location of the hotel was sub-optimal as it turned its back on the racecourse;
 - Revenues from the Horseracing Betting Levy Board (HBLB) were falling sharply, largely due to the increase in online betting with bookmakers based off-shore which was not captured by the HBLB. This has resulted in JCR increasing its own contribution to prize money which is a key contributor to the health and viability of the racing industry.
- 3.5 In light of the above factors, JCR has found it increasingly challenging to secure the funds to make capital investment in the necessary upgrades that Sandown Park requires. The Jockey Club-wide net profit of £4.5m is not enough to fund improvements to Sandown Park which would allow the comprehensive and substantial improvements it needs, thereby delivering the vision of the Masterplan. The ongoing maintenance is not enough to deliver the vision of the Masterplan. While maintenance and measures have been introduced relative to changing regulation, these have immediate and short term in nature

and the facilities have continued to deteriorate. A significant capital investment is needed to secure long term, sustainable solutions.

4 NEED FOR IMPROVEMENTS – CONDITIONS OF THE BUILDINGS AND FACILITIES

- 4.1 As stated in the Planning Statement and the Post-Consultation Supplemental Statement (Core Document CD6.50 and CD6.47 respectively), Sandown Park's need for improvements stems from the current condition of the buildings and facilities which are in a poor state and do not meet the quality and standards to which JCR aspires in order to hold high quality race meetings and to improve its visitor offer in order for Sandown to remain attractive and provide long term sustainable solutions.
- 4.2 The condition of facilities at Sandown Park has been deteriorating without capital investment in the necessary upgrades which need to go beyond day to day maintenance to secure the long term sustainable future for Sandown Park. Such an improvement is needed with British Horseracing (BHR) operating in an increasingly competitive international environment with owners and trainers operating globally. Improvements are imperative to capture the most appealing race-card, and thereby industry following to sustain the course. BHR is currently arguably pre-eminent in the world in terms of the quality of horseracing overall. Put simply, if the facilities are not of high or excellent quality, the key figures in the global horseracing industry, in particular owners and trainers, will direct their investments in BHR elsewhere. If the key figures, and the capital that they represent, chose to do this, BHR will diminish.
- 4.3 It should be noted that Sandown Park requires more investment than it did 10 years ago to be restored to meet changes in regulations and best practice pertaining to matters such as animal welfare, equality law requirements (including the needs of female jockeys), safeguarding and health and safety. These factors are confirmed the following surveys and guidance:
- Annual Structural Survey 2018, prepared by Capita (Appendix 7 of the Post-Consultation Supplemental Statement) (Core Document CD6.47);
 - Annual Structural Survey 2019, prepared by Capita (**Appendix 1**); and
 - Building Condition Report 2020, including M&E Condition Survey, prepared by Rapleys and D.Stanley Consulting (**Appendix 2**).
- 4.4 Additionally, some parts of the facilities at Sandown Park do not currently meet an advisory document/recommendations of the safety management and operation of sports ground set out in Guide to Sports Safety Sixth Edition (2018) by Sports Grounds Safety Authority (Core Document CD3.44) (Extracts at **Appendix 3**).
- 4.5 In particular, and as underlined by the annual structural survey reports and the building condition, the existing infrastructure at the racecourse is ageing and need substantial investment. Examples of this include:

THE STABLES AND ASSOCIATED FACILITIES

- 4.6 JCR's annual structural surveys from October 2018 and October 2019 highlighted a number of issues and defects in the existing stables. This repeated findings from previous surveys going back a number of years.
- 4.7 The stables consist of a number of single storey buildings including a veterinary first aid unit, a sampling unit, 110 stable units, toilet block, along with tack boxes, security office and storage units. The stable block was built over a number of years dating back to the 1930's and some parts even earlier.
- 4.8 The stables are nearing the end of their economic life, run down and in need of work in a number of areas. The timber is rotting in many places and generally in need of repainting to prevent further deterioration. Electrical installation, drainage and water supply are all areas needing upgrades.

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- 4.9 A number of other works are required to ensure ongoing welfare standards, including the need for replacement stable staff accommodation (as the existing lodge requires significant investment over the forthcoming years to maintain operational delivery, and its facilities/infrastructure are at the end of their lives) and newly re-aligned pre-parade ring, as well as horsebox drop off and saddling boxes.
- 4.10 The Building Condition Report also identifies that the stables and stable yard are in a consistently dilapidated condition and in need of substantial refurbishment of the roofs, rain gutters, walls, external joinery and yard surfaces. It recommends that a redevelopment providing modern facilities to meet customer expectations and horse welfare guidelines is desired.
- 4.11 The Building Condition Report identifies that Sandown Lodge (including stable staff canteen) is dated, and requires a full replacement of ceiling tiles to ensure consistent appearance, as the original specification of ceiling tiles are no longer available. Finishes are suffering from general wear and tear and the major plant and equipment installations were installed in 1994. Now 25 years old, breakdowns are very likely. The hostel requires a substantial refurbishment and modernisation.
- 4.12 At present, Sandown Park's medical and first aid room does not meet the size and provision as recommended in the Guide to Sports Safety document. This needs to be addressed in order to bring the standard up to the guidance.

THE RACETRACK

- 4.13 The provision of the best possible track conditions is key for Sandown Park's future and for maintaining a competitive and high quality race programme. As mentioned above, the scheme provides for widening of the racing surface at two important areas of the track, which facilitates an improved and safer racing product.
- 4.14 Another key part of these works are improvements to the course crossing, currently a tarmac surface, covered for racing using coconut matting. This is a crude and unsustainable solution, and in the long term must be updated to meet modern standards and expectations in particular for horse welfare.

THE GRANDSTAND

- 4.15 The current Grandstand was opened in 1973 and, at that time, was a first class example of multi-use venue. Now 46 years old, grandstand infrastructure does not meet current needs of JCR's race day or event customers. Further, the Grandstand incurs increasingly significant maintenance costs each year in order to continue to operate and deliver at its current level. This ongoing cost does not contribute to enhancements to our customer proposition.
- 4.16 The Building Condition Report identifies that many of the facilities are outdated and do not meet the expectation of the customers. In particular, the main M&E installations were replaced in 2002 and are therefore approaching or beyond the end of their expected design life and breakdowns are likely to occur. It concludes that a substantial refurbishment of these facilities is now required.
- 4.17 The fire rating of walls, floors and doors and structures would need to be upgraded to ensure that they meet the current regulations as recommended in the Guide to Sports Safety document.
- 4.18 In summary, the facilities at Sandown Park require a substantial refurbishment and modernisation to address the poor and dilapidated state of the buildings. These works are essential in order to meet the quality and standards of "excellence" that JCR aspires in order to capture the most appealing race-card and to secure long term, sustainable solutions for the racecourse.

5 RETENTION OF CUSTOMERS AND DISCRETIONARY SPEND

- 5.1 As stated in the Planning Statement and paragraph 3.8 Post-Consultation Supplemental Statement (Core Document CD6.47), Sandown Park needs to improve its visitor offer to attract to racegoers and conference and events customers, particularly in terms of the retention of the existing customer base.

This, in turn, will assist in securing investment in prize money thereby further improving the race card and guest experience.

- 5.2 Research has shown how racing needs to compete with all other leisure activities. Sandown Park needs to compete with sporting venues and hospitality facilities outside Elmbridge, which have recently been subject to considerable investment, such as Twickenham (a refurbishment value at £34million – Twickenham West Stand Refurbishment Images at **Appendix 4**), White Hart Lane and Ascot. Pictorial examples of the quality sought for Sandown Park are attached at **Appendix 5**. Sandown Park must be able to offer the right customer experience relative to other competing venues and facilities, not least as the public can exercise choice in expending their disposable income.
- 5.3 Feedback to the Racecourse made it clear that the facilities and offer at Sandown Park need significant upgrade in order to meet customer needs and expectation. Customers identified that improvements to the facilities and access are the one of the key and primary areas where Sandown Park would need to invest in.
- The course needs to be upgraded;
 - The Grandstand is very outdated and needs upgrading;
 - Hospitality and event venues need to be improved from “poor” and “shabby” conditions to “premium” standard; and
 - Access to and within Sandown Park needs to be improved for easier and better access, including better arrangements for existing car park, easy movement within the racecourse from paddock to a view of the racecourse.
- 5.4 To meet the objective of retaining the customer base and address the needs of customers, JCR is seeking to provide:
1. The highest quality fixture list throughout the year by maintaining a high number of runners per race, which is both competitive and attractive to racegoers.
 2. An enhanced guest experience of racecourse facilities and new on-site hotel on surplus land to contribute to the offer at Sandown Park and address the current deficient of visitor accommodation within Esher and wider locality.
- 5.5 Evidence from JCR owned Cheltenham Racecourse which underwent a significant redevelopment and upgrade, completed in 2015, confirms that there is a clear linkage in the retention of customers and increase in the spend per head. JCR’s record of race meetings confirm that the spend per head has increased from £53.67-£55.69 in 2014/2015 to £74.77 in 2019. Sandown Park aspires to raise the standard to “excellence” following the example of Cheltenham Racecourse and other high quality racecourses and sporting and hospitality venues.
- 5.6 In summary, as a result of overseas competition, it is key that the quality of UK facilities achieves excellence as its standard. Other sporting arenas, stadiums and leisure attractions nationwide are seeing significant levels of investment to sustain their future and offer the highest level of customer experience to attract new and retain existing customers, meaning a challenging marketplace is becoming increasingly competitive. It is therefore fundamental to Sandown Park that the quality and standards of the facilities are substantially improved to allow a step change in order to retain customers and to increase their spending, who would otherwise be more attracted to other sporting venues and leisure facilities outside the Borough.

6 CONCLUSION

- 6.1 To conclude, this statement demonstrates that:
- JCR’s financial position, which has been affected by a number of factors, including the financial impacts from the reduction in horseracing’s media rights and an industry-wide decline in racecourse attendance, is such that JCR would need to look for funds outside The Jockey Club-

wide profit in order to provide capital investment in significant improvements and modernisation of Sandown Park.

- Sandown Park requires substantial improvement works to secure the site's long term future in order to address the poor, dilapidated and deteriorating state of the facilities which do not meet the quality and standard required to attract a high quality race-card or to meet customer needs.
- Sandown Park requires substantial improvement works so that it is able to compete with high quality sporting venues and leisure facilities which have undergone substantial upgrades in recent years in order to retain customers and visitors and to increase their spending per head, in turn underpinning the economic viability of Sandown as a racecourse.

6.2 The consequence of not carrying out the works would ultimately result in further decline and deterioration of the racecourse and its associated facilities, which would threaten the venue's future viability. JCR's remit, as it pertains to Sandown Park, is to operate the racecourse successfully; JCR, not least through the Jockey Club's Royal Charter, is committed to this. However, as with all businesses it is not immune to market forces and competition, and requires its operations to be commercially sustainable.