

1. This is an unfair process: after unexplained delay, during which The Lodge's hotel's operation continued without consent, this application is on short and unadvertised notice, notwithstanding strong opposition. This procedure has prevented any review by the affected town and parish councils.
2. It's a major departure from the stated intention of NRC not to build the 123-room hotel on its clearly established and confirmed site: Unless that hotel is to be built as approved between the Grandstand and the Central Area, the existing consents don't apply. It is misconceived for officers to say the limit of 123 bedrooms 'is imposed across the entire planning site', (i.e., the entire racecourse) when the hotel is only permitted on one identified place.
3. There cannot be two hotels without a case to justify that development: With one at The Lodge, the case for retaining permission for a 123-room hotel is lost. Approval would be an unfair green light to extending The Lodge to 123 rooms.
4. NRC's evidence was to avoid high costs of a new hotel, when it could use The Lodge. This proposal is inviting WBC, based on later private representations, to ignore that evidence.
5. It is not for officers, tasked with carrying out instructions as to the terms of a s.106 agreement, to abandon that task and instead spend months in private negotiations about major changes to the conditional approval.
6. It is questionable whether s.106 provides authority to permit such arrangements, there being no legal report to justify them. Alternatively, reliance on it must be after a detailed reopening of the planning history and public engagement.
7. If NRC won't sign a s.106 agreement in the terms presently required, then this application should be refused. If the 123-room hotel is to be retained, then there should not be a hotel at The Lodge. Instead, NRC should seek an extended temporary permission. Alternatively, the consent must require NRC to revert the use of The Lodge to a racing-related hostel upon it building and opening its permitted 123-bed hotel.
8. It is pure fiction for officers to state that The Lodge is a 'valuable amenity', when there has been minimal community support for it. Community members have actively opposed it being used other than a hostel. Planning condition 4 would only serve NRC's purposes, by avoiding having to meet its planning obligations to provide community facilities close to residential Eastern and Central Areas and not just adjacent to the residential Western Area. Further, this proposed condition is akin to a licensing matter, and is not for planning. The Racecourse site, including The Lodge, is already subject to the terms of a full entertainment licence.
9. To permit The Lodge's closure for 'private functions' implies an operation inconsistent with a full-time hotel or community facility. NRC's 'Heart Space' already fully services private and other functions; there is no need for The Lodge to be another such venue.