Shepway District Council Matter 3
Opening statement and issues

Opening Statement

The Council’s Matter 3 statement of the Inspectors MIQ’s provides a detailed response regarding the scale, type and amount of development proposed, the consideration of alternatives, compliance with national policy and the effectiveness of policy SS8, taking in to account the changes to the policy set out in the January 2012 document.

Folkestone Racecourse has long been recognised in successive local plans as a location for additional leisure, recreational, tourism and exhibition development, subject to environmental and heritage criteria. The importance of the racecourse as a key leisure and tourism facility has therefore long been supported by planning policy.

The Districts Spatial Strategy, as set out in Policy SS1 has evolved through the Plan and is a culmination of the consideration and testing of numerous options and forms a 6 stage process, as set out within the Final July 2011 Sustainability Appraisal and the numerous SAs and commentaries have sat alongside and informed the evolution of the Plan.

Sustainability Appraisal of the Plan has been ongoing since the later part of 2007. In particular

Issues and Options January 2008. At this stage The Council considered the “big decisions” to be made regarding Shepway’s development path, including the pattern of development, the type of development, and the driving focus for development in the district. These “broad strategies” were subject to appraisal, identifying opportunities and challenges brought about by each option.

The spatial strategy, set out in policy SS1 of the Core Strategy provides an amalgamation between two of the options tested, seeking to capitalise on the potential benefits identified for both Option 1a (concentrating development around large towns) and 1b (an identified broad area). It is this approach that led to the formation of the “Strategic corridor” concept.

In April 2009 The preferred Options SA Commentary was developed in order to assist the Council with the development of spatial options, whilst finalising the preferred options document. The document provides a description of the need for growth and Shepway’s growth strategy options, summarises the key evidence that has informed this commentary and provides comments and testing of how the growth options perform in terms of social, economic and environmental objectives, the 3 strands to sustainable development set out in the NPPF.
Following on from the SA commentary (April 2009) a Sustainability Appraisal Report (May 2009) was completed for the Preferred Options document. In assessing the proposed racecourse policy ND2 the Sustainability Appraisal identified no concerns with the proposed allocation.

In July 2010 SDC Cabinet agreed the spatial strategy relating to the quantum of growth set out as the Preferred Option. This cabinet report also included a process for selecting Strategic Sites to be included within the Core Strategy Document.

This strategic site evaluation process is set out in documents A39 and A40. These documents include a full analysis of each of the 8 sites put forward at Preferred Options, providing a ranking so as to allow consideration of sites against each other. The analysis was carried out against PPS12 criteria and emerging district wide objectives, summarised in Appendix 3 of document CR1.

Sustainability Appraisal of these options is set out in Appendix 2 of document CR1, The Shepway Strategic Sites Evaluation Process Sustainability Appraisal Commentary (completed in March 2011). The report considers whether there is a need to alter the findings of the Preferred Options SA, in light of any changes made to the Sites.

With regards to the Racecourse the document provides a SA of the changes to the preferred approach, which include an amendment to the residential component of the scheme increasing to 800 dwellings from at least 400 previously set out. The commentary provides a summary of potential effects, both positive and negative. These include

- Significant heritage benefits
- Uncertain negative impacts on landscape character and a need to undertake further analysis of the impact of the development on the locality and AONB.
- Significant benefits for economic growth and competitiveness
- Ability to help meet housing needs.
- Uncertain negative impacts with regard to the local community. Opportunity to mitigate these impacts through design solutions, infrastructure upgrades and phasing.
- Concerns whether the location might present limitations to the development of a vibrant, integrated community without on site community facilities and excellent transport links attracting commuters. Inclusion of community facilities is recommended to counteract any such risk
- Fewer houses would be less likely to deliver community facilities, such as a school.
- The greater quantum of housing at this location may reduce pressure on other areas within the wider AONB.
The SA then suggested a number of policy options that should be included to mitigate against negative impacts and secure positives. As such it is considered the Sustainability Appraisal tested both the development of the racecourse for 400 and 800 houses, providing a commentary regarding the positive and negative impacts and making suggestions that could be carried forward into policy.

Picking up on the points raised in the Sustainability Appraisal a Landscape and Visual Issues Assessment (A58) was completed in May 2011, including an identification and evaluation of key landscape and visual effects, landscape mitigation strategies and conclusions. This report identified that whilst the proposal would have local landscape impacts it was considered to have severely limited inter-visibility with areas within the North Downs AONB, these being largely confined to those more distant parts of the AONB between Postling and the B2068. The findings of this report helped inform policy SS8.

Prior to the publication of the of the Core Strategy A stage 5 Appraisal was carried out in June 2011, including representations of amendments for Strategic sites including the Racecourse. Following amendments to the Plan The Final Sustainability Appraisal Report July 2011, sits alongside the core Strategy July Submission Document

The Council therefore considers the testing of various development options and alternatives has formed a comprehensive component of the evolution of the plan, as documented above.

**Compliance with National Policy & Countryside protection**

NPPF includes a presumption in favour of sustainable development. The Council considers the Plan and policy SS8 fully complies with this requirement.

Land allocated under policy SS8 is currently occupied by the racecourse, which includes permanent buildings and structures, and their curtilages as well as the open land of the course itself. The racecourse is located outside of the AONB and therefore the provisions of the NPPF, as set out in paragraphs 115 and 116 do not apply to the site. That said, the Council recognises the importance of the setting of the AONB via policy CSD4 and the site specific requirements of policy SS8 (f).

Whilst adjacent to, but outside of an existing settlement Folkestone Racecourse is within close proximity to the rural communities of Newingreen, Westenhanger, Stanford and Sellindge. Paragraph 55 seeks to ensure rural development enhances or maintains the vitality of rural communities. The proposed development complies with this component of the NPPF, supporting and enhancing existing transport facilities and providing facilities which benefit the wider community.
The Council considers the quantum of development sought aims to build a balanced, sustainable community, minimising the need to travel by car by providing on site community infrastructure and services that meet with section 4 of the NPPF, in particular paragraphs 29 and 30, which seeks to ensure new developments are balanced in favour of sustainable transport modes and give people a choice; and paragraph 38 which seeks to ensure large scale developments provide a mix of uses and include key facilities such as primary schools and local shops within walking distance of most properties.

Infrastructure Requirements

The Council has worked with the Racecourse and numerous stakeholders and consultees to identify infrastructure requirements and ensure the proposed development is deliverable, both with regards to viability and phasing.

Changes made to the policy, set out in document A117 clarify that the amount of residential development, not that just some residential development should be justified as part of the comprehensive redevelopment of the racecourse.

Infrastructure requirements are set out in both Policy SS8 and Appendix 2 of the CS submission document. Key infrastructure requirements include

Transport Infrastructure – the upgrading of Newingreen Junction, improvements to bus services, walking and cycling opportunities and upgrades to the station car park.

Drainage Infrastructure – including the upgrading of foul water drainage and culverting works.

Green Infrastructure & Heritage, including surface water management and improvements to GI assets in accordance with CSD4 and improvements to the setting of Westenhanger Castle and Barns

Community Infrastructure – including substantial on site provisions including a primary school, shops, business premises and open space.

Leisure and Tourism Infrastructure – via the delivery of a new racecourse and the associated benefits to the District.

Viability

All of the above viability requirements, including the detailed costing of providing the racecourse form part of the final December 2011 viability statement, which also includes a development and infrastructure phasing plan. Earlier viability statements have been subject to considerable scrutiny by the Council, whilst policy SS8 requires further viability work to support any detailed proposals for the site.
Conclusion

The Folkestone racecourse proposals put forward a positive approach to securing the delivery of a significant mixed use development in a sustainable location which accords with national policy. It provides a realistic way forward and is well justified by specific evidence that shows it to be the best option given the site’s unique characteristics.
Chronology and processes undertaken by the Council in formulating policy SS8, including the consideration of alternatives.

These have been set out in detail in the Sustainability Appraisal. Sustainability Appraisal of the strategy has been ongoing since January 2008 and forms a 6 stage process, summarised in the Final July 2011 document.

Looking to each stage of the Sustainability Appraisal it is clear that throughout the testing of options and policies has been at the heart of Core Strategy formulation.

In particular

Issues and Options January 2008. At this stage The Council considered the “big decisions” to be made regarding Shepway’s development path, including the pattern of development, the type of development, and the driving focus for development in the district. These “broad strategies” were subject to appraisal, identifying opportunities and challenges brought about by each option.

Chapter 9 of the final Sustainability Appraisal sets out how the plans development has been influenced by the appraisal of the alternative broad spatial approaches considered at Issues and Options. The spatial strategy, set out in policy SS1 of the Core Strategy provides an amalgamation between two of the options tested, seeking to capitalise on the potential benefits identified for both Option 1a (concentrating development around large towns) and 1b (an identified broad area). It is this approach that led to the formation of the “Strategic corridor” concept.

In April 2009 The preferred Options SA Commentary was developed in order to assist SDC with their development of spatial options, whilst finalising their preferred options document. The document provides a description of the need for growth and Shepway’s growth strategy options, summarises the key evidence that has informed this commentary and provides comments and testing of how the growth options perform in terms of social, economic and environmental objectives, the 3 strands to sustainable development set out in the NPPF.

Prior to the Preferred Options consultation during the summer of 2009 the Council set out 4 growth options for the District, with the Document setting out the Councils preferred option and an explanation of the considerations which led to the Preferred Option being put forward, informed by the substantial evidence base (p4 of April 2009 document).

The SA commentary identifies that the preferred option represents an amendment away from the current situation, which has been heavily focussed on Folkestone, Hythe and Hawkinge, by recognising a need for development
in the central belt that has traditionally been the focus of infrastructure investment. The Preferred Option promoted

4800 new homes in the Folkestone and Hythe Area
700 new homes in the Romney Marsh Area, with the majority in and around New Romney Town.
1600 new homes in the North Downs Area, with the bulk of the provision in the south west area, outside of the AONB.

The SA commentary provides an appraisal of the Preferred Option in terms of how it meets Sustainable Development objectives. A key aim is to demonstrate the relative merits of the preferred option in comparison to the other 3 rejected options. The findings identify that the Preferred Option seeks to target development in order to stimulate growth in Folkestone, Hythe and New Romney whilst by focussing development within the central transport corridor (strategic corridor) and in the Romney Marsh there is potential to capitalise on Shepway’s key areas of competitive advantage. The SA commentary concludes that the Preferred Option compares favourably to other options tested, as set out in section 9 of the final SA.

Following on from the SA commentary (April 2009) a **Sustainability Appraisal Report (May 2009)** was completed for the Preferred Options document. The redevelopment of the racecourse site was put forward as the preferred option under policy ND2 – A high quality mixed use development that secures the long term future of the racecourse, alongside two other options ND2a (to not allocate the site) and ND2b (to allocate an alternative, larger site to the southwest of the junction). Alongside the racecourse proposal other options were set out for the North Downs Area within policies ND3, 3a and 3b, ND4, and ND4a and ND5 and ND5a.

In assessing the proposed racecourse policy ND2 the Sustainability Appraisal identified no concerns with the proposed allocation.

In July 2010 SDC Cabinet agreed the spatial strategy relating to the quantum of growth set out as the Preferred Option. This cabinet report also included a process for selecting Strategic Sites to be included within the Core Strategy Document, to be submitted to the Council by October 2010.

This strategic site evaluation process is set out in documents A39 and A40. These documents include a full analysis of each of the 8 sites put forward at Preferred Options, including the Racecourse against PPS12 criteria and emerging district wide objectives, summarised in Appendix 3 of document CR1. Sustainability Appraisal of these options is set out in Appendix 2 of document CR1, **The Shepway Strategic Sites Evaluation Process Sustainability Appraisal Commentary (completed in March 2011)**. The report considers whether there is a need to alter the findings of the Preferred Options SA, in light of any changes made to the Sites.

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