EXAMINATION OF THE SHEPWAY CORE STRATEGY DEVELOPMENT PLAN DOCUMENT

INSPECTOR’S MATTERS, ISSUES & QUESTIONS

MATTER 2 – HOUSING, ECONOMY AND INFRASTRUCTURE
[CORE STRATEGY POLICY: SS2]

Representations on behalf of Arena Leisure plc/Aldersgate Investments Ltd

**Are the Core Strategy’s proposals for the provision of new housing and economic development deliverable, clear, sufficiently justified and consistent with the local evidence base, the South East Plan and national policy in PPS 3? Does the Core Strategy provide satisfactorily for the delivery of development, with particular reference to transportation infrastructure, and enable adequate monitoring of its effectiveness?**

**Background**

1. These representations have been prepared on behalf of Aldersgate Investments Ltd (AIL) which has just acquired Arena Leisure Plc (ALP). AIL are part of Reuben Brothers Holdings which already owned part of ALP.

2. ALP operated seven racecourses and Reuben Brothers own Northern Racing (Northern), which operates ten racecourses in the UK. Overall the owner (hereafter AIL) of the Folkestone Racecourse has considerable experience in operating and enhancing racecourses and associated facilities. This experience and expertise has been invaluable in preparing the overall Masterplan for Folkestone Racecourse which includes significant improvements for the Racecourse. Discussions have also taken place with leading house builders to ensure that the strategy approach to the proposed residential element was sound.

3. Folkestone Racecourse is the only racecourse in Kent. It is an important regional leisure amenity in the Folkestone and the East Kent area, with the nearest other racecourses located at Plumpton, Brighton and Lingfield.

4. The Kent & Medway Structure Plan (2006) recognised the potential to maintain and improve facilities at Folkestone Racecourse and Policy CA1 stated that proposals should strengthen the current uses at Folkestone Racecourse.

5. As it is a major leisure/tourist attraction, the racecourse also helps support other local business in the vicinity, such as hotels. **Appendix 1** is a statement from Shepway Channel Chamber of Commerce explaining the benefits having a racecourse in the area can provide.

6. In addition, a widespread consultation exercise was undertaken, which involved discussions with local businesses, Parish Councils, Ward Councillors and residents.

7. Over the years the Racecourse has been under threat because its facilities and infrastructure are old and inadequate and do not provide an appropriate standard of facility and accommodation. Without expanding and widening its revenue-generating activities, its operational viability is in jeopardy with
the long term risk being the decline of the Racecourse’s operations to a point where the business is no longer commercially viable and closure would need to be considered.

Over the past 4 years, Arena Leisure Plc have worked with SDC in order to devise a sustainable Masterplan (Library Reference: A52) that enhances the Racecourse, as well as providing new dwellings and added community benefits to the District. The culmination of this work is represented in Proposed Policy SS8.

Is policy SS2’s housing target, which is in excess of that needed to meet South East Plan requirements, adequately justified by the local evidence base? Specifically:

a) Is this target achievable, given recent housing completion rates?

b) Has a sufficient level of housing supply been identified to meet this target, consistent with PPS 3’s requirements of deliverability and developability?

c) What is the justification for setting a housing target to 2030/31 in addition to 2026/27?

Paragraph 14 of NPPF states that “At the heart of the NPPF is a presumption in favour of sustainable development. For plan-making this means that local planning authorities should positively seek opportunities to meet the development needs of their area”.

In addition, in the third bullet under paragraph 17, it is stated that planning should “proactively drive and support sustainable economic development to deliver the homes, business, infrastructure and thriving local places that the country needs … and to respond positively to growth”. The ninth bullet also states that planning should “promote mixed use development, and encourage multiple benefits from the use of land in urban and rural areas...”. The eleventh bullet states that planning should “actively manage patterns of growth to make the fullest possible use of public transport and focus significant development in locations which are or can be sustainable”.

On this basis, it is considered that the Core Strategy very much accords with National Policy.

On housing, paragraph 47 states that local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area. They need to identify deliverable sites to provide five years worth of housing and to identify a supply of developable sites for years 6-10 and , where possible, 11-15. The identification of land at Folkestone Racecourse assists in meeting these requirements for the reasons set out below.

Shepway District Council (SDC) consider that the overall housing target is justified and would address the long term needs of the District. The housing target identified by SDC is supported by AIL. Whilst the target does exceed the level set out in the South East Regional Spatial Strategy (RSS), it will maximise the opportunity for the District to achieve its identified housing target within the plan period and to support overall growth in the District. This approach is considered reasonable and appropriate as SDC have been informed by various evidence documents and demographic studies (e.g. Strategic Housing Land Availability Assessments).

Given that the Council has been able to identify a number of key strategic ‘suitable’ and ‘deliverable’ sites, it is considered appropriate and reasonable to identify these within the Core Strategy. With regard to Folkestone Racecourse, careful consideration has been given to the suitability of the site and why it should be considered a sustainable location for residential development. The potential strategic sites proposed by SDC have been assessed and this was vetted by SDC Cabinet on 13 April 2011 (Library Reference: A41 (Appendix 3)).
However, this Representation focuses only on the proposals for Folkestone Racecourse and why these can assist in delivering the housing target. Core Strategy Policy SS8, proposes mixed use development for up to 820 dwellings at the Racecourse. The provision of residential development at Folkestone racecourse is considered to be appropriate, as it is not constrained by the AONB and it is located next to a station and on a number of bus routes. There is capacity, within one ownership, to deliver a balanced and sustainable community.

The overall benefits of the proposed site allocation are discussed in Matter 3, and for the reasons set out in that submission is considered that the provision of residential development to support the improvements to the Racecourse is justified.

It is also considered that the Racecourse is a sustainable location for residential development and that, with the right amount of development, a sustainable community can be created. Following carefully consideration of the viability of the development proposals, together with discussions with housebuilders and a local agent, it is considered that the development of up to 820 dwellings at Folkestone is deliverable and achievable.

The infrastructure needed to bring forward the development has been considered. Key requirements such as drainage and road capacity/junction improvements have been assessed in order to ensure that the infrastructure to ensure delivery can be in place at the right time. In addition, the Masterplan accommodates a 2FE Primary School and private and public amenity areas.

Siting development at Folkestone Racecourse would ensure the accessibility of the new residential development to services and facilities, thus reducing the need to travel especially by car. The site is immediately adjacent to Westenhanger railway station that provides services to Ashford and Central London.

With regard to buses, there are five existing services located at Newingreen, to the south eastern corner of the Site. These provide a combination of regular hourly services to Folkestone and Ashford; local services to Hythe, Lympne and Sellindge as well as other services to London, Dover, Canterbury, West Hythe and Sandgate.

An allocation of up to 820 dwellings would maximise opportunities to deliver a sustainable form of development. A residential development of this size would comprise a mix of unit sizes, types and tenures, to meet a variety of housing needs and aspirations within the District. The housing delivered would be designed to be flexible and adaptable to meet changing needs of residents as much as possible, where feasible and viable. This would include designing a proportion of units to Lifetime Homes standards.

In terms of affordable housing, provision would be made within the development, albeit the level of provision will be subject to viability. The form of such provision would be discussed with the Council at the detailed planning stage, having regard to local need and demographics at the time the development comes forward. The inclusion of such provision would ensure the creation of a mixed and balanced community.

Overall, AIL support the housing strategy in Policy SS2 and consider that the Folkestone Racecourse site provides sufficient capacity to accommodate up to 820 dwellings in a location that avoids development in the AONB. The site is also a sustainable location which can offer good public transport links as well as infrastructure improvements that would support a mixed and balanced community. The site is a sustainable location for residential development that can help to deliver the
proposed housing target. Therefore, it is concluded that the delivery of the dwellings at Folkestone Racecourse is **achievable.**
APPENDICES

MATTER 2 – HOUSING, ECONOMY AND INFRASTRUCTURE [CORE STRATEGY POLICY: SS2]

APPENDIX 1 - LETTER FROM KENT CHANNEL CHAMBER OF COMMERCE
Ref: Folkestone Racecourse Developments

As the Accredited Chamber of Commerce for East Kent we are writing on behalf of our members to support the proposed mixed use development at Folkestone Racecourse. We understand the proposals are identified in Policy SS8 of the Shepway Core Strategy (July 2011).

Kent Channel Chamber of Commerce has been an active supporter of these proposals throughout the past two years and has played an active role in organising key meetings between the developers and local businesses since July 2010. This has enabled us to fully understand the reasons for the proposals and the economic benefits that will accrue locally as a result of these developments.

There is clearly a strategic need for this site to be re-developed as it has regional economic, leisure and business importance. Located adjacent to the M20 (Junction 11) and Westenhanger rail station it has excellent transport links and local employment opportunities are also most attractive.

As well as the increased employment opportunities at the Racecourse, the expanding Lympne Business Park (less than one mile away) is online to stimulate hundreds of new jobs within the next 10 years and, of course the Wildlife Park at Port Lympne is both a valuable employer and visitor attraction that future local residents can take advantage of.

All these employment opportunities are within the immediate vicinity of the proposed associated housing development to this proposal. It will also bring environmental advantages since any vehicle usage will be minimised. However, it should not be forgotten that the ‘growth point’ at nearby Ashford (just 10 miles away) represents a further employment opportunity for new residents of this housing development.

We are therefore able to confirm our strong support for the proposal as identified in Policy SS8 of the Core Strategy and we consider the re-development of the racecourse and associated development should be progressed to maintain the area's economic competitiveness and regional importance.

In conclusion, there is no doubt in our minds that there is an overwhelming argument in favour of these developments that will bring prosperity and an improved standard of living to everyone locally.

Yours sincerely

Peter Hobbs
Chief Executive