Shepway Core Strategy Examination

Matter 3: Folkestone Racecourse

Issue 3: Are the Core Strategy’s proposals for Folkestone Racecourse realistic, deliverable, adequately justified and consistent with national and regional policies?

3.1 These additional comments have been prepared by Brian Lloyd BSc (Hons) MSc MRTPI on behalf of CPRE Protect Kent (the Kent Branch of the Campaign to Protect Rural England) in conjunction with the Shepway CPRE District Committee. CPRE is a national charity that seeks to retain and promote a beautiful and thriving countryside that is valued by everyone.

3.2 These additional comments should be read alongside representation number 97 made by CPRE Protect Kent on the Proposed Submission Document, July 2011. They should also be considered alongside our concerns with the concept of the Strategic Corridor (Matter 1) and the overall housing target set in Policy SS2 (Matter 2).

3.3 It is our view that the proposal for housing development at Folkestone Racecourse is unjustified and would comprise unsustainable development in the open countryside, contrary to national and regional planning policies. The sole justification for this development is to ‘enable’ improvements to be undertaken at the racecourse, on the basis that this will support and create jobs and enhance the racecourse as a tourist/visitor attraction. It appears to us that as a consequence of this, and to justify the proposed housing development, the Council has concocted the ‘Strategic Corridor’ and has set an inflated housing target.

3.4 The third bullet point of Statement 4.1 of the proposed submission document (page 34) states that in the Strategic Corridor, outside of the Folkestone and Hythe urban areas, development will be promoted at the largest and best served communities, close to economic development opportunities and in less sensitive areas. The Folkestone Racecourse proposal is specifically highlighted as satisfying these ‘tests’. We disagree that this is the case, and that in fact the proposal fails to comply with any of them.
3.5 With regard to the first of these tests, located at the largest and best served communities, this proposal is not ‘at’ any settlement and whilst it abuts the small settlement of Westenhanger it is essentially a new freestanding development in the open countryside. It quite clearly fails this first test.

3.6 The Council may point to paragraph 52 of the recently published National Planning Policy Framework (NPPF), which states:

“The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities. Working with the support of their communities, local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development. In doing so, they should consider whether it is appropriate to establish Green Belt around or adjoining any such new development.”

3.7 We do not consider that this lends support to proposals such as at the Racecourse. This paragraph of the NPPF must be seen in the context of the statements made by the Prime Minister in a speech on 19th March to the Institution of Civil Engineers when he extolled the virtues of Garden Cities in meeting housing need and announced that there would be a consultation later this year on how to apply the principles of Garden Cities.

3.8 Whilst the consultation is still awaited, it is clear to us that the intention of this paragraph of the NPPF, in the context of the Prime Minister’s comments, is for larger scale new sustainable settlements with a full range of social and community infrastructure and services, akin perhaps to the ‘eco-towns’ proposed by the previous Government. The proposal for housing development at Folkestone Racecourse is not of this scale or character.

3.9 It is our concern that the proposed development is not of a scale to be a sustainable community with a sustainable range of services and facilities, and it is not located where services are already available in an existing settlement. Consequently it will become a dormitory settlement where the residents will rely on the private motorcar to access most of their day-to-day needs. Such reliance is contrary to the principles of sustainable transport and sustainable development generally.
3.10 The risk, though, in endorsing this allocation is that over time the development will spread and grow in an attempt to become more self-sufficient, being justified by its location in the Strategic Corridor. This could be at the cost of the very thing that the development was intended to protect and promote; the racecourse itself.

3.11 In this regard, we are concerned that the ownership of the racecourse has very recently changed. Whilst retaining the trading name ‘Arena Leisure’ the company is now entirely owned by the larger Aldersgate Investments Limited, a company incorporated in the British Virgin Islands that is controlled by David and Simon Reuben. Aldersgate already own Northern Racing Limited which operates ten horse racecourses in the UK. Folkestone Racecourse, therefore, will become a ‘smaller fish in a bigger sea’ of the racecourses operated by Aldersgate.

3.12 It is also concerning to us that Aldersgate is also a property development company and that the development opportunity at the racecourse may become the primary interest rather than the racecourse itself. We were surprised that the District Council did not advise the Inspector of this change of ownership when replying to his second note on the 2nd March, as we believe that this places some question marks against the work previously undertaken by Arena Leisure, on which the Council relies.

3.13 With regard to the second test, close to economic development opportunities, we fail to see how the economic development potential of the racecourse is of such potential importance and scale to justify a housing development of 820 dwellings and the costly infrastructure needed to facilitate it. The permanent workforce at the racecourse is currently small, and this is supplemented by casual staff at the times of race meetings. Whilst the proposals might result in more hospitality services and jobs, it is difficult to see how this could be classed as an economic development opportunity that would justify this ‘strategic’ level of housing development and infrastructure investment. They will be very expensive jobs to create. Consequently, it fails this second test.

3.14 With regard to the third test, in less sensitive areas, we are not alone in challenging development in this location. In particular we share the concerns of the Kent Downs

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1 See the racecourse web-site at: http://www.folkestone-racecourse.co.uk/working-for-folkestone-racecourse.html
AONB Unit that the development will have a damaging and detrimental impact on the setting of the AONB. Consequently, it also fails this third test.

3.15 In summary, it is our serious concern that the development proposed at the Folkestone Racecourse is ill conceived and unacceptable. Being a freestanding development in the open countryside, with only a limited range of supporting services and facilities proposed, it is unsustainable and contrary to national and regional policies that seek to ensure that development minimises the need to travel. The economic development opportunities at the racecourse are limited, and do not justify the damaging and costly development proposed. We therefore ask the Inspector to remove this proposal from the Plan.

3.1 Has it been demonstrated that the type and amount of development now proposed is necessary in order to achieve improvement of the racecourse facility? What alternative approaches were considered and why were they discounted?

3.2 Is the intended scale, type and location of development proposed at Folkestone Racecourse consistent with national policies that seek to (1) protect the countryside for its own sake and (2) reduce the need to travel and secure more sustainable patterns of transport development?

3.3 Does policy SS8 give sufficient guidance to ensure that the type and amount of development proposed, along with the racecourse’s improvement, will be secured? Specifically, has adequate clarity been provided in respect of:

a) infrastructure requirements (notably in respect of transport, drainage and green infrastructure);

b) deliverability and phasing?

3.16 We have seen, and endorse, the full response to these questions submitted by Stanford Parish Council. Consequently, we do not propose to repeat the points they make.