Shepway Core Strategy
Examination in Public

Matter 3: Folkestone Racecourse [Core Strategy policy: SS8]

Issue 3.3

Additional information by
Kent Wildlife Trust

Respondent ref: 25
Matter 3 – Folkestone Racecourse [Core Strategy policy: SS8]

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

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?

1. Kent Wildlife Trust has substantiated many of our concerns regarding this site within our submissions to Matter 1 Issue 1.4 and Matter 2 Issue 2.6 namely that:-
   • There is currently inadequate baseline information or mitigation to ensure the protection of the Natura 2000 network within the area
   • There is no requirement within the policy to provide contributions for any recreational or other impacts on the wider BOA network or the designated sites it contains. Within Policy SS8 there is a requirement to provide an on-site Green Infrastructure.

2. In relation to Folkestone Racecourse we are particularly concerned regarding the proposed culverting of the Stour River. This is an important wildlife corridor that runs throughout many districts within Kent. Culverting of the river will lead to a reduction in the biodiversity value of this important corridor as bank side habitat will be removed and connectivity severed. This will not only lead to biodiversity impacts within the site, but could have far reaching impacts throughout the river system. For this reason it is our view that culverting should not be undertaken as part of the development, but rather that the Green Infrastructure and SUDS should be designed to focus on the River, providing wide buffer strips to act as soakaways for any excess water and aid the drainage of the site.