Examination of the Shepway Core Strategy Development Plan Document

Response to additional evidence from
The Remembrance Line Association and
The Folkestone-Boulogne Ferry Service

May 2012
Shepway District Council

Matter 4.2 – Folkestone Seafront additional statement in response to further evidence submitted by The Remembrance Line and The Folkestone Boulogne Ferry Service

a) Are the location, boundary and proposed mix of uses in this strategic location adequately justified? What alternatives were considered, and why were they discounted? Is the extension to this site boundary that is now being proposed necessary for soundness reasons?

b) Has sufficient consideration been given to the future role of Folkestone Harbour itself and to existing and proposed linkages (notably the existing harbour rail link)

Introduction

This statement has been prepared in response to the additional evidence submitted by The Remembrance Line Association and The Folkestone-Boulogne Ferry Service following the consideration of Matter 4.2 Folkestone Seafront at the Shepway Local Plan Core Strategy examination hearing on the 9th May 2012.

The District Council’s case in relation to the matters, issues and questions (MIQs) relating to Policy SS6 Spatial Strategy Folkestone Seafront is set out in document Z54 SDC Statement on Matter 4. In addition a verbal presentation on each of the matters raised was given at the hearing, with the District Council responding to questions from the Inspector.

It is not therefore intended to repeat the Council response to the 4.2 MIQs in the statement. The statement will focus on the key question as to whether this additional evidence provides sufficient justification to include the retention of Folkestone Harbour Station and the provision for passenger ferry services as an absolute requirement within Policy SS6 thus preventing schemes with a mix of uses that does not include those two elements from being supported.

The Remembrance Line

Before commenting on the evidence as submitted it is necessary to clarify the statement made in the covering letter in relation to the meeting between Shepway District Council and the Remembrance Line Association. A meeting took place, not in October 2011, but on 9th November 2011 at which the Leader of Shepway District Council and the Council’s Planning Policy and Economic Manager, David Shore were present along with Richard Moffatt and David Harvey from the Remembrance Line Association. The RLA representatives gave a verbal presentation on the key elements of the
Business Plan. A hard copy of the business plan was not however given to the District Council at the meeting and it was agreed that a copy of the document would be forwarded at a later date. The District Council does not recall receiving such as document. Also as a point of clarification the Leader of Shepway District Council is Cllr. Robert Bliss not Alan Bliss.

The Business Plan provides a useful summary of the views of The Remembrance Line Association (RLA) in relation to the future use of the Folkestone Harbour Branch. However, in order to justify the modification to Policy SS6 that RLA proposes, the evidence contained within the document would need to demonstrate that the social, economic and environmental benefits of the retention of Folkestone Harbour Station, and the associated ferry service, are of such significance that only a scheme including such provision would be able to deliver sustainable development and that the provision of sustainable development would not be delayed. This is supported by NPPF paragraph 15 which states:

*Policies in local plans should follow the approach of the presumption in favour of sustainable development, so that it is clear that development which is sustainable can be approved without delay.*

The District Council considers that the business plan, whilst setting out some interesting proposals, does not meet the test outlined above as it is not based on a robust evidence base and does not include sufficient evidence to demonstrate the deliverability of the schemes that is proposes. In particular the Council would draw attention to the lack of the following information within the Business Plan:

- A detailed market analysis to justify the passenger numbers set out on page 24 of the plan.
- No evidence of interest from operators in running the proposed charter services.
- The phasing plan on page 27 does not include a clear timescale for delivery.
- No income or cash flow projections are included within the plan. For example the year 1 capital and revenue costs are shown as being over £2 million (p25/26) yet it is no clear how these year 1 costs will be funded. There is very little detail on the proposed share scheme or any evidence of support from the banking sector.
- No risk assessment or contingency plan in included.

Dealing with a more fundamental issue, a key component of the plan is the running of a charter service to a timetable, and examples are set out on pages 16 and 17. It is clear that these services have the potential to compete with the existing franchised services between London and Folkestone currently operated by South Eastern Trains. The *Stakeholder relations code of practice - Freight/charter track access*, prepared by Network Rail states the following in relation to charter services:

*Freight/charter track access*.
Charter trains are usually one-off or limited frequency special passenger services, like trains to sporting events or luxury dining trains. Their access rights are usually spot bid only.

The Council is not therefore not fully convinced that the running of a timetabled charter service, of the type presented in the business plan, is possible under the provisions of the Railways Act 1993.

With regard to the Shepway District Council Park and ride it is suggested that this service be provided by the District Council as part of its off street parking service. The Shepway Parking Strategy 2011 – 2015 was adopted in September 2011 and does not include provision for this scheme. No cost estimates, usage estimates or pricing structures have been included within the business plan, nor has any detailed justification been provided as to why Folkestone needs a park and ride facility in this location or why, if such a scheme was indeed justified, it could not be provided using the public highway. In addition the land suggested for the car parking associated with this scheme is not within the ownership of the District Council and is allocated employment land under saved local plan policy E1.

The Folkestone-Boulogne Ferry Service.

The total submission from The Folkestone – Boulogne Ferry Service, covering both the publication, post submission MIQ and additional evidence stages, consists of two letters constituting a total of two side of A4 and a one page e-mail, along with two diagrams showing the potential land take.

The submission makes a number of statements notably:-

- The service anticipates 250,000 passenger movements in the first year of operation, increasing to 300,000 second year and averaging over subsequent years.
- Border Control and Customs may be willing to establish their operations in the Port of Boulogne as they have for Eurotunnel and the Calais-Dover sea route, in order to ensure their impact would be minimal.
- The project represents a light investment with a turnover initially in the order of £5 million, is totally sustainable and environmentally friendly and at 2012 prices, bears no resemblance to previous schemes with heavy commitment and non-sustainable or uneconomic passenger figures.
- Our business case is backed by anticipated passenger numbers deliberately held at conservative levels and has been endorsed from a number of sources in both the public and private domain in both the UK and private domain in both the UK and France. We see our project being able to generate very significant consumer business in central Folkestone.
However on the basis of the information submitted to the examination these statements remain unsubstantiated and are not supported by clear written evidence, that would justify a modification to SS6. The issue of land take is covered in detail in the statement submitted by the Folkestone Harbour Company.

**Conclusion**

Both the Remembrance Line and Folkestone-Boulogne Ferry Services have set out proposals for the future use of the Harbour Branch and the Folkestone Harbour. However the District Council’s view remains that, given the lack of clear evidence supporting these proposals they do not justify making any modification to Policy SS6, a policy that does not prevent support being given to proposals that include the operation of a passenger ferry service and/or the Harbour Branch were a viable business case to be made.