Dear Ms Sansom

SHEPWAY DISTRICT CORE STRATEGY, EXAMINATION IN PUBLIC
REPRESENTATION IN RELATION TO POLICY SS6 AND EXPLANATORY TEXT

This representation, made on behalf of The Trustees of the Viscount Folkestone (1963) Settlement ('The Trustees') (013), accompanies the previously made representations (November 2011 & NPPF statement, April 2012) in relation to Policy SS6 and its explanatory text.

The Trustees:

1. Object to the deletion of saved Shepway District Local Plan, First Review Policies FTC7 & FTC8 as a result of the allocation of Folkestone Seafront as a strategic site allocation, and

2. Seek revisions to the wording of SS6 in which to ensure compliance with National Planning Policy Guidance (under the previously submitted representation).

The Trustees submit to the Examination:

1. There is no justification for the deletion of policies FTC7 & FTC8 from the current Local Plan as a result of the proposed allocation of the seafront as a strategic site.

2. The allocation of the strategic site is supported by the Trustees. The Council’s (and Folkestone Harbour Company’s) submission that a single ownership may enable the seafront site to be deliverable within the plan period (or at least most of it) is accepted and recognised.

This does not, however, preclude the future re-development of land to the north of Marine Parade and/or the ability for the FTC7 & 8 sites to enable the connectivity of the proposed strategic site to the town centre. Indeed, it is submitted that with joint working and an integrated approach to the provision of necessary infrastructure, there is significant potential to re-introduce connectivity between the site and the town centre.
3. The Inspector is advised that The Trustees have already invested significant funds in exploring opportunities for the connection of the Seafront area with the town centre. Whilst the Inspector will not wish to consider the details of any such scheme or proposal, we attach at Appendix 1, extracts from a scheme commissioned in 2008. This information is provided to the Examination to demonstrate that improved and inclusive access, up and down the Leas Cliff, has been considered and is deliverable in the event of a joint-working approach to infrastructure provision.

4. The retention of Local Plan policies FTC7 & 8 will complement the allocation of the seafront as a strategic site and the wider regeneration proposals. The retention of these policies will provide the opportunity for a Master Plan (as required by proposed policy SS6) to realistically consider the improved connectivity between the seafront and the town centre as required by the policy’s explanatory text at paragraphs 4.142 and 4.144 and Figure 4.7. No conflict will arise as a result of the retention of policies FTC7 & 8 and the allocation of the seafront as a strategic mixed use allocation.

5. We attach, at Appendix 2, relevant extracts of the previous Inspector’s consideration of the Seafront regeneration proposals, considered as part of the Local Plan review. The Trustees support these previous comments, in particular:

Paragraph 13.1.42
“Some form of vertical pedestrian transport up and down the Leas Cliff would be an essential feature of the Seafront redevelopment concept as a whole, in my view. It would encourage pedestrian movement between the Seafront area and the town centre, especially for those of limited mobility, and would reinforce the perception of the Seafront as an integral part of the attractions of central Folkestone. It is not right for policy to explicitly require financial contributions…”

Paragraph 13.1.52
“Policy area FTC8 is at a key location between the town centre, including the Bouverie Place development, and the seafront sites. Criterion (c) of the policy would provide for a new vertical link up the cliff, which could indeed involve a novel form of public transportation such as a cable car. This would be the only place along the cliff top, apart from at the Leas Cliff Hall, where there would be building between The Leas and the cliff edge.”

It is, therefore, submitted that the retention of Local Plan policies FTC7 & 8 is essential in bringing forward the infrastructure required to meet a key aim of the wider regeneration proposals of Folkestone and in realising the full potential of connectivity between the town centre and the proposed seafront allocation.

6. In having regard to the Matters, Issues and Questions as raised by the Inspector, The Trustees submit the following:

The Core Strategy’s proposals for Folkestone Seafront are realistic and deliverable but are not entirely justified or consistent with national and regional policies. The Trustees submit that the proposals would become so with:

- The retention of Local Plan policies FTC7 & 8 and the deletion of the reference to their deletion, from paragraph 4.151 from the Submission Document, and
- The suggested re-wording/revisions to policy SS6, as set out below, to enable connectivity of the seafront to the town centre in line with the wider regeneration proposals as required by the emerging Core Strategy and relevant National, Regional and Local Planning Policy

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Policy SS6: Spatial Strategy for Folkestone Seafront
Folkestone Seafront area is allocated for mixed use development, providing a variety of dwellings (up to 1,000 homes), small shops and retail services (A use classes) and offices (class B1) totalling at least 10,000sqm; together with enhanced sports and cultural facilities and associated on- and off-site community and physical infrastructure.

Planning permission will only be granted where:

- Proposals clearly support the delivery of planned incremental redevelopment for a distinctive, unique and high quality seafront environment; with a mix of uses providing vitality for the whole site and Folkestone.

- The proposals directly contribute to the regeneration of Folkestone by reconnecting the town centre to the Seafront, and enhancing the attractiveness of the central Folkestone and its appeal as a cultural and visitor destination through the provision of an offer that is complementary to the Creative Quarter.

- Development is appropriately phased to ensure benefits can be fully realised, with infrastructure improvements delivered at a suitably early stage to ensure on-site facilities are available to foster a new sense of place and community, and to manage environmental impacts in relation to infrastructure capacity.

- An access and transport strategy is developed that maximises the potential for walking and cycling through the provision of a new lift or similar means of vertical public transportation up the Leas Cliff reconnecting the Seafront with the town centre and the public transportation network. The strategy shall include highway improvements, parking arrangements and improved bus links to improve the connectivity of the seafront to the town centre and central and eastern Folkestone.

- Sufficient contributions, highway improvements and parking arrangements are made to improve the connectivity of the Seafront to the town centre and central and eastern Folkestone, opening up new direct pedestrian, cycle and bus links and according with SS5.

- The design is of very high quality and preserves the setting of the key archaeological and heritage features of the site and is sympathetic to the landscape and coastal character of the area including the retention of the Inner Harbour Bridge.

- The layout is planned to achieve sufficient ground floor active/commercial uses in and around the Harbour and at the Pier Head Quarter to ensure a sense of vitality can be maintained fully utilising the setting, and also featuring a restored Marine Parade promenade and a range of open and enjoyable coastal environments.

- Development delivers 300 affordable housing dwellings for central Folkestone, subject to viability (or if the total residential quantum is less than 1,000 units, a 30% contribution).

- Residential buildings achieve a level of water efficiency of 90litres/person/day or better, plus Code for Sustainable Homes level 3 or higher, and all buildings designed to allow convenient waste recycling.

- All development is located within the site in accordance with national policy on the degree of flood risk and compatibility of specific use and, where necessary, include design measures to mitigate flood risk.

- Any detailed planning application submitted in relation to any of the site will only be granted if it is supported by and consistent with:
Either a masterplan for the whole site produced in line with this policy and the key concepts identified within Figure 4.7 of this Plan, or

An outline/detailed planning application for the whole site that provides satisfactory masterplanning in line with this policy and the key concepts identified within Figure 4.7 of this Plan including phasing proposals.