1. **Introduction**

1.1 This position statement sets out the agreed positions of the Folkestone Harbour Company (FHC) and the Trustees of Viscount Folkestone (1963) Settlement (Trustees) regarding the soundness of the Submission Core Strategy and in particular the position of both parties in relation to the Folkestone Seafront Strategic Allocation (Policy SS6) and related explanatory text. It is intended to assist the Inspector in the consideration of the proposed Core Strategy and the representations made by both parties in this respect.

1.2 The Folkestone Harbour Company has promoted the proposed Seafront allocation, as a strategic mixed use site, as part of the Core Strategy Process. Shepway District Council, responsible for the preparation of the District’s Local Plan, has included the site as part of the Submission Core Strategy; a position that the FHC has, in turn, supported as making the Plan ‘sound’.

1.3 The Trustees, whilst supporting the principle of the strategic allocation, objected to:

   (i) the proposed deletion of policies FTC7 & 8 as a result of the intended strategic allocation,
   (ii) the wording of Policy SS6 and the omission of any requirement for the Seafront allocation to consider a means of vertical public transportation up the Leas Cliff, and
   (iii) the lack of inclusion of the two sites known as the ‘Undercliff’ and ‘Overcliff’ (Currently the subject of Local Plan policies FTC7 & 8) as part of the strategic allocation.

1.4 Accordingly, discussions have taken place between the FHC and The Trustees and their representatives, with common ground having been reached following the submission of the objection by The Trustees.

2. **Relevant Documentation**

2.1 In having regard to areas of common ground reached, all parties have had full regard to:

- Representations made on behalf of the FHC supporting the soundness of the Core Strategy;
- Representations made on behalf of The Trustees objecting to the soundness of the Core Strategy;
- The Inspector’s Matters, Issues and Questions relating to Session 4b ‘Spatial Strategy for Folkestone Seafront’;
- The Council’s response to the Inspector’s Matters, Issues and Questions (Matter 4).
3. Matters of Common Ground

3.1 As a result of discussions between the Land Owners (and representatives) of both the proposed Folkestone Seafront Strategic Allocation and those sites known as 'The Overcliff' and 'The Undercliff', it is recognised by both Parties that these sites are deliverable brownfield sites under the proposed core strategy however greater clarity is required in this respect.

3.2 In discussing the deliverability of the proposed strategic allocation, the Trustees recognise that the inclusion of their sites ('The Overcliff' and 'The Undercliff') as part of the strategic allocation may affect or impact upon the deliverability of the site and, therefore, wish to withdraw their objection to its inclusion as part of Policy SS6. As a consequence, and having an understanding of the transportation strategy as a background document to the Core Strategy, the Trustees wish to withdraw their objection to Policy SS6 as provided in the representation dated 30th April 2012.

4. The position of the Parties

4.1 Both parties, therefore, support the proposed strategic allocation of the Folkestone Seafront and Policy SS6 but consider more clarity could be provided in relation to the potential offered by the sites formally known as the undercliff and overcliff sites.

4.2 As a consequence, both Parties suggest that the following revisions would render the Plan sound in this context:

Paragraph 4.139 – The addition of the following:

"To the north of the site allocation are two Brownfield sites currently the subject of saved policies FTC7 and FTC8. This land is not part of the strategic site allocation but would be considered one of the 'sites of development opportunities' suitable for development in Figure 5.5".

At Paragraph 5.94 and after (3rd line) "...contribute to overcoming the severance in movement..." ADD:

"This Arc includes the two sites to the north of Marine Parade and either side of Marine Crescent, formally known as the 'Undercliff' and the 'Overcliff'.

4.3 It should be noted that the parties have not reached common ground in respect of the deletion of policies FTC7 and FTC8 as noted under 1.3(i) above. Both parties maintain their stances as set out in their original representations on this matter.
Agreed

Savills on behalf of The Folkestone Harbour Company:

Ms S Round – Associate

Date: 08/05/2012

Lee Evans Planning on behalf of The Trustees of Viscount Folkestone (1963) Settlement:

Miss K Banks, Associate

Date: 08/06/2012