



Adrian Tofts Strategy, Policy and Performance Lead Specialist Folkestone & Hythe District Council	Our Ref: Date:	PINS/L2250/429/7 16 July 2021
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Dear Mr Tofts,

Examination of the Folkestone and Hythe District Core Strategy Review

Further to our letter of 1 July 2021, we are now able to identify the main modifications which we consider are necessary to make the submitted Core Strategy Review sound. An outline of these main modifications is set out in the attached document. As you will see, most of these are based on the suggested modifications put forward by the Council during the course of the examination (now contained in Document EX124). The attached document also provides some guidance on the nature and format of the main modifications.

Our conclusions on the issues and the reasons for main modifications will be set out fully in our report and we will take account of consultation responses, updated sustainability appraisal and other relevant information before reaching our final conclusions. We must also stress that we are not inviting or expecting comments on the document we have produced. There will be a full consultation exercise on the actual schedule of main modifications in due course.

Subject to main modifications concerning detailed policy wording, we consider that the District Spatial Strategy, the overall approach to the three character areas and settlements within them is sound. The housing requirement of an average of 738 dwellings per year over the plan period is justified. However, it is necessary to introduce a phased approach to the requirement to reflect the reality of the timescale for delivery of the New Garden Settlement at Otterpool. The phasing proposed by the Council during the examination is appropriate. We are satisfied that the Core Strategy Review will provide for an adequate supply of housing over the plan period and at least a five year supply of housing land at the point of adoption. This assessment takes into account our conclusion that realistically, the New Garden Settlement may not start delivering housing completions until 2024/25. The implications of this are that there is a small reduction in the estimated overall supply of housing compared with the Council's latest version of the housing trajectory (EX097) and there are fewer dwellings envisaged to be delivered at the New Garden Settlement in the plan period.

Turning to the proposed New Garden Settlement specifically, we consider that in principle it is justified given the scale of housing need identified, the significant physical and environmental constraints that exist across much of the rest of the District and the

limited scope for development within or adjacent to existing settlements, beyond that already identified through the recently adopted Places and Policies Local Plan.

Main modifications are required however to address a number of concerns, including the potential impact on the setting of the Kent Downs AONB, nutrient enrichment and the effect on the Stodmarsh designated sites and the overall approach to infrastructure and phasing. The potential impacts on the Strategic Road Network and the need for mitigation were the subject of considerable discussion and additional work during the examination and you will see that main modifications are required to ensure that the Core Strategy Review is effective in setting out adequate clarity regarding the approach to highway infrastructure and mitigation. In the case of Policy SS9 and the overall approach to infrastructure, the attached document sets out the principles of main modifications needed, rather than identifying specific amendments, as we have for other policy areas. We would like the Council to consider these points and provide us with suggested main modifications, building on those previously put forward and the additional information submitted in connection with the resumed hearing session on the New Garden Settlement.

There are a number of other modifications required to ensure that the Core Strategy Review is positively prepared, justified, effective and consistent with national policy. In the case of Policy CSD5 and the issue of nutrient enrichment, you will note that we consider that the extent of affected surface water catchments should be shown on the Policies Map. This is because the operation of the policy will rely to some extent at least on the definition of a particular geographical area. The change to the Policies Map to show this area should be published separately but alongside the schedule of main modifications, to aid people's understanding of the implications of the main modification.

In order to progress, we would be grateful if you could prepare a schedule of proposed main modifications, along the lines set out in the attached document for our consideration.

Once we have agreed the detailed schedule of main modifications, it will need to be published for full consultation for at least six weeks. Sustainability appraisal of the main modifications will be needed and a report on this should be published alongside the main modifications schedule. You may also consider that a Habitats Regulations Assessment is appropriate. We are happy to discuss the detailed mechanisms and timescales for progressing the main modifications process via the Programme Officer.

Yours sincerely,

Kevin Ward and Philip Mileham

INSPECTORS