

Examination of the Folkestone and Hythe District Core Strategy Review

Inspectors' note

Outline of main modifications required

- 1) Starting point is the submitted Core Strategy Review document dated February 2020 (EB 01.00). Main modifications are to this starting point.
- 2) Reference to the schedule of modifications suggested by the Council is the composite version dated 25 June 2021 (EX124). There are some typographical errors in this and some case where the retained text of the submitted Core Strategy Review has not been transferred correctly and some cases where the suggested modifications do not match exactly those set out in the earlier EX documents. The Council should check the detail of EX124 thoroughly and amend accordingly.
- 3) Unless specifically referred to below, no modifications are required for soundness. No other modifications should be added. Additional minor modifications prior to adoption are entirely a matter for the Council and should be kept completely separate from this process.
- 4) Single modification with single ref i.e. MM1 for all bullet points under each policy which may incorporate a number of specific amendments to a policy and/or associated reasoned justification.
- 5) Main modifications should be shown clearly using the conventions of **bold and underlined** for new text and ~~strikethrough~~ for deleted text, using the text from the submitted plan as the basis. Where large sections of text are to be deleted this can be referred to as "delete para XX" or "delete para XX and replace with..". It must be absolutely clear which text is to be deleted.
- 6) The schedule of proposed main modifications should contain three columns
 - Main modification ref. e.g. MM1, MM2 etc.
 - Policy/para ref.
 - Proposed main modification
- 7) Reasons for the proposed main modifications should not be included. Reasons will be set out fully in the Inspectors' report.

Policy SS1 – District Spatial Strategy

- Amend Policy SS1 as in EX124.
- Insert new paras to follow after 4.36 as in EX124 in respect of Dungeness Power Station
- Amend para 4.37 as in EX124.

Policy SS2 – Housing and the Economy Growth Strategy

- Amend first para of Policy SS2 to refer to a total requirement of 13,284 to be consistent with other references.
- Insert additional text after first sentence of Policy SS2 to explain that the housing requirement will be phased as in EX053 as follows:
2019/20-2023/24 – 590 dwellings a year
2024/25-2028/29 – 920 dwellings a year
2029/30-2033/34 – 730 dwellings a year
2034/35-2036/37 – 695 dwellings a year
- Amend Table 4.2 within Policy SS2 as in EX124 subject to categories referring to:
“Employment (offices, research and development, light industry, Class B2 and Class B8)”
“Goods retailing (retail and food/beverage uses excluding financial and professional services)”
- Amend reasoned justification in section 4.2 including update to Table 4.1 as in EX124 subject to additional para after para 4.42 to explain phased approach to housing requirement
- Amend Table 4.3 and para 4.64 to reflect the latest housing trajectory produced by the Council (Appendix 1 to EX097) subject to delivery on the New Garden Settlement starting in 2024/25 i.e. pushing annual delivery figures back one year and therefore also reducing total for plan period
- Amend diagram in Appendix 3 of CSR to reflect the latest housing trajectory subject to the above point and add table with actual figures along lines of Appendix 1 to EX097 subject to the above point

Policy SS3 - Place-Shaping and Sustainable Settlements Strategy

- Amend paragraph 4.78 to refer to sequential approach to take into account all forms of flooding as per EX124.
- Amend Policy SS3 to reflect that employment should reflect size and scale which accords with settlement’s position in the settlement hierarchy as set out in EX124.
- Amend SS3(b) to reflect site specific FRA within areas identified by Environment Agency surface water flooding.

- Amend SS3d) to reflect the NPPFs language in respect of preserving and where possible enhancing statutory and non-statutory heritage assets as per EX124.
- Amend to include measures to optimise energy from renewable or low carbon sources as per EX124.
- Re-number criterion as per EX124.

Policy SS4 – Priority Centres of Activity Strategy

- Amend Policy SS4 as in EX124 subject to also amending second sentence to read “Major commercial and employment should be located.....”
- Amend Table 4.5 under category of Major Employment Sites to read “To protect and provide premises for light industrial, Class B2 and Class B8 type uses suitable to.....”

Policy SS5 – District Infrastructure Planning

- Amend part c of Policy SS5 as in EX124 (N.B. do not add part d or new para after 4.127 as suggested. These issues to be dealt with under Policy SS9)
- Review Policy SS5 in light of modifications to Policy SS9 etc. covered below to ensure consistency

Policy SS6 - New Garden Settlement - Development Requirements

- Amend Policy SS6 as in EX124 subject to:
 - Part 1 a – amend to make reference to a minimum of approximately 5,600 new homes (N.B. as a consequence of completions expected to start a year later – see above)
 - Part 1 d - clarification of reference to “an existing centre” in suggested additional text
 - Part 3 a – amend suggested additional text to refer to “...light industrial uses within Class E”. Clarification as to whether B8 uses would also be appropriate. Ensure figures for employment floorspace in SS6 are consistent with SS2 etc. (N.B. also see submitted CSR different figure)

Policy SS7 - New Garden Settlement - Place Shaping Principles

- Amend Policy SS7 as in EX124 subject to not including suggested additional text at part 6 i (N.B. to be dealt with comprehensively under SS9)
- Amend para 4.179 as in EX124 subject to removing reference to class A1 and A2
- Add new paras to follow after 4.178 and 4.180 as in EX124

Policy SS8 - New Garden Settlement - Sustainability and Healthy New Town Principles

- Amend Policy SS8 as in EX124

Policy SS9 - New Garden Settlement - Infrastructure, Delivery and Management

- Amend Policy SS9, reasoned justification and add further information in CSR to set out clearer approach to the provision of infrastructure and phasing related to the NGS e.g.
 - Amend part b of Policy SS9 along the lines of the suggestion in EX124 but refer to critical **and necessary** infrastructure including education, wastewater and **highways mitigation**. Consider detailed wording e.g. is reference to phased period appropriate given that suggested APP5 does not have time periods set out?
 - Add to policy to set out clear approach on highway mitigation and reference to monitor and manage approach.
 - Consider how to refer to use of S278 agreements for improvements to SRN
 - Add an Appendix along the lines of suggested APP5 but have cross reference in it to the monitor and manage frameworks for SRN and LHN
 - Include the monitor and manage frameworks for the SRN and LHN in the CSR
 - Ensure that the reasoned justification explains the situation clearly and specifically how the Council will ensure that necessary and critical infrastructure will be provided at the right time (acknowledging that the specific needs for infrastructure may evolve over the plan period and APP5 and the monitor and manage frameworks provide the best assessment at this time).
- Review Policy SS5 in light of above to ensure consistency

Policy SS10 – Spatial Strategy for Folkestone Seafront

- Amend first para of Policy SS10 to read
“....comprising small shops and retail services, offices (within Class E) and other community and leisure uses; together with beach sports and sea sports facilities and with associated and improved on-site and off-site community and physical infrastructure.....”
- Amend part h. to read
“Development delivers 22% affordable housing dwellings for central Folkestone, subject to viability.”
- Amend part i. to refer to 110 litres/person/day as in EX124.

Policy SS11 – Spatial Strategy for Shorncliffe Garrison, Folkestone

- Amend first para and part j. of Policy SS11 as in EX124.
- Amend part i. to read
“Development delivers 22% affordable housing dwellings for the urban area, subject to viability.”
- Add text to green box before para 4.207 to explain that 233 dwellings were completed before the start of the plan period and an additional 967 dwellings are expected to be completed in the plan period, bringing the total to 1,200.

Policy CSD1 – Balanced Neighbourhoods

- Amend Policy CSD1 and supporting text to be consistent with the Framework regarding the full range of ‘affordable housing’ as defined in the NPPF glossary as per EX124
- Remove references to a ‘minimum of’ 22 per cent affordable housing provision as per EX124
- Amend wording to reflect 70% of the affordable housing shall be for rent as per EX124
- Amendment to policy wording to provide flexibility for development that would not be viably able to provide the full affordable housing requirement and remove paragraph 5.8 of reasoned justification as per EX124
- Amendment to policy wording to allow for affordable housing exceptions schemes to come forward where a local need is identified and where there is a suitable site for this purpose as per EX124
- Amend policy wording to reflect affordable housing should be designed to integrate in function and appearance with market housing as per EX124.
- Delete paragraph 5.8 from supporting text as per EX124.

Policy CSD2 – District Residential Needs

- Update table in CSD2 to reflect Framework definition of affordable tenures as per EX124.
- Update policy text to reflect supervision of elderly or others in need of supervised care and facilitate provision of high quality of care as per EX124.

Policy CSD3 – Rural and Tourism Development

- Amend policy to text to remove ‘closed list’ and to reflect the approach to rural workers as per the Framework in accordance with EX124.

- Add new policy criterion to reflect development making optimal viable use of a heritage asset as per EX124.
- Amend policy to ensure the community facilities that support the designation of settlements are maintained and to set out what such community facilities might include as per EX124.
- Amend policy text to cross refer to Policies CSD4 and CSD5 as per EX124.
- Remove reference to 'centre of' village as per EX124.
- Modify and amend paragraphs 5.32-5.33 as per EX124.

Policy CSD4- Green Infrastructure of Natural Networks, Open Spaces and Recreation

- Modify text box to reflect Dungeness Complex Sustainable Access and Recreation Management Strategy as per EX124.
- Modify paragraph 5.42 as per EX124
- Amend Policy CSD4 to reflect biodiversity net gains having regards to statutory and national policy requirements, and to seek improvements to GI as identified in the GI report (2011).

Policy CSD5 - Water and Coastal Environmental Management

- Include supporting text following paragraph 5.48, update green text box and modify paragraphs 5.65 and 5.66 as per EX124.
- Amend Policy to delete BREEAM outstanding and replace with 'excellent'. Amend CSD5 to reflect not increasing surface water runoff to above existing greenfield rate as per EX124.
- Amend criterion c) to reflect requirement for SuDS where feasible as per EX124.
- Add new criterion d) to require demonstration that development will need to provide evidence of likely nutrient impacts, and that permission will only be granted where development can demonstrate, subject to meeting the tests in the Habitats Regulations, that it would not have a significant effect on designated sites as per EX124.
- Add new criterion or amend d) to reflect effects of 'development within the Stour Operational Catchments as defined on the Policies Map'. (see covering letter regarding Policies Map change)
- Add further criterion to CSD5 to set out how development proposals outside the Stour operational catchments will be identified in order to determine whether they will need to provide evidence to ensure no significant effect on the Stodmarsh European sites. Further text to be added in reasoned justification to supplement the additional policy wording as to how the Council will assess schemes outside the Stour Operational Catchment.
- Amend para 5.72 as per EX124
- Add new paragraphs on nutrient neutrality and operational implementation of the policy having regard to Natural England's advice as

paragraphs 5.74-5.77 along with map showing Stour Operational Catchments as per EX075. Note - the map of the 'Stour operational catchments' needs to be included in the Main Modifications schedule and show as a new figure as per EX075.

- Include new sub-hearing before para 5.74 as per EX124.

Policy CSD6 – Central Folkestone Strategy

- No main modifications necessary

Policy CSD7 – Hythe Strategy

- Amend second sentence of first para of Policy CSD7 to read "All new development, including that on the former Nickolls Quarry site (identified in Figure 5.5) should respect...."
- Amend para 5.107 to explain more about the status of the former Nickolls Quarry site in terms of planning permissions and completions.

Policy CSD8– New Romney Strategy

- Amend Policy CSD8 as in EX124

Policy CSD9 – Sellindge Strategy

- Amend Policy CSD9 as in EX077*
- Amend Fig 5.7 as in EX077 subject to reference to Site A and Site B for consistency with policy
- Amend paras 5.156, 5.157, 5.159 and add new para 5.163 as in EX077*

*N.B. some typos in EX124