



Adrian Tofts

Strategy, Policy & Performance

Lead Specialist

Folkestone & Hythe District Council

Our Ref:

PINS/L2250/429/7

Date:

6 April 2020

Dear Mr Tofts,

Examination of the Folkestone and Hythe District Core Strategy Review

1. Further to the submission of the Core Strategy Review, we are continuing with our preparation in relation to the examination and set out below a number of initial queries and requests.
2. The examination document list refers to a Local Development Scheme 2020. Can you confirm the status of this document and provide a copy.
3. Can you confirm what evidence is available regarding viability (including but not limited to the overall plan, the New Garden Settlement allocation and the broad locations along with policy requirements including affordable housing provision, the mix of housing types and water efficiency standards).
4. We note that a housing trajectory is set out in Appendix 1 of the Core Strategy Review: Revised Housing Need and Supply Evidence Paper. Can you confirm that this represents the Council's most up to date position. It would be helpful if you could add to this information by setting out in a table form, the anticipated delivery of housing from each of the different sources identified on a year by year basis for the whole of the plan period.
5. The Statements of Common Ground include some suggested modifications to the submitted Core Strategy Review. Can you confirm the Council's position in respect of these suggested modifications. It would be useful if a schedule of potential modifications could be created which can be added to over the course of the examination.
6. Policies SS5, SS10, SS11, CSD3, CSD4, CSD6, CSD7 and CSD8 of the Core Strategy Review are replacing policies from the 2013 Core Strategy. However, these do not appear to have been subject to Sustainability Appraisal (SA) as part of the submitted SA report. Whilst these policies are to be rolled forward from the adopted Core Strategy with only minor amendments and were previously subject to SA, they nonetheless form part of the submitted Core Strategy Review.

7. Section 19(5) of the Planning and Compulsory Purchase Act 2004 requires that the Local Planning Authority carry out an appraisal of the sustainability of the proposals in each Development Plan Document. The submitted plan covers a longer time period than the document it is proposed to replace (i.e. to 2037), and there may have been other changes to baseline data and reference sources since the previous appraisal was carried out that now require consideration. Furthermore, without a complete SA of all policies it would not be possible to consider the 'in-combination' effects of the policies with the proposed New Garden Settlement. As such, the abovementioned policies will need to be subject to SA and the results of that appraisal included in an addendum to the report.
8. The proposed New Garden Settlement is intended to be a strategic allocation and as such will be shown on the Policies Map as stated in the first sentence of Policy SS6. The adoption of the Core Strategy Review would result in a change to the adopted Policies Map and therefore a proposed submission Policies Map should have been published in line with Regulation 19 and then submitted in line with Regulation 22. Whilst Figure 4.5 shows the site boundary, it does not fulfil the criteria for the Policies Map set out in Regulation 9, notably being reproduced from or based on an Ordnance Survey map.
9. We are satisfied that the proposal for the New Garden Settlement is clear from the Core Strategy Review document and that interested parties will have been aware of it and were able to make informed representations at the appropriate stage. However, it is necessary to produce a submission Policies Map showing how the adopted Policies Map would be changed and for this to be added to the examination documents. There is no need to consult or seek comments on the submission Policies Map as it is not a Development Plan Document.
10. Whilst Policies SS10 and SS11 also relate to strategic allocations, these are carried forward from the 2013 Core Strategy and it is our understanding that they are already shown on the adopted Policies Map. We would be grateful if you can confirm that this is the case.
11. We would also be grateful if you could confirm the approach in relation to Policies CSD6-CSD9 and the areas for development shown on Figures 5.4-5.7. It is our understanding that these are intended as broad locations rather than site allocations and as such would not need to be shown on the Policies Map. However, we note that the strategy diagrams appear to show sites and specific areas for development and the policies contain relatively detailed criteria. It also seems that in some cases the Places and Policies Local Plan will result in amendments to the settlement boundaries concerned.
12. Can you also confirm, noting the second sentence of Policy SS4, whether the Priority Centres of Activity are all already shown on the adopted Policies Map.
13. As a broader point, it would be useful for us to be provided with paper copies of the adopted Policies Map or at least a fixed electronic version which comprehensively shows all of the adopted policies and proposals.
14. We will continue with our initial preparation with a view to producing Matters, Issues and Questions and Guidance Notes in due course. You will understand that under current circumstances we are unable to give a clear timetable for examination

hearings. We will of course aim to move forward with the examination as much as possible and will keep you informed of any changes in the approach that the Planning Inspectorate is taking.

15. We would be grateful if you could respond to the above queries and undertake the necessary work as soon as possible. We appreciate however that Council resources and staffing levels may be affected by the current situation and that you and your colleagues may have other priorities. We are happy to discuss timescales for your response and address any queries you have via the Programme Officer. We look forward to your reply.

Yours sincerely,

Kevin Ward and Philip Mileham

INSPECTORS