



Adrian Tofts Strategy, Policy and Performance Lead Specialist Folkestone & Hythe District Council	Our Ref: Date:	PINS/L2250/429/7 21 May 2020
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Dear Mr Tofts,

Examination of the Folkestone and Hythe District Core Strategy Review

1. Thank you for your response to our initial letter and for providing the information and clarification on a number of matters. There are two issues which we need to pursue further however.

Viability

2. In terms of your response to our request for confirmation of the evidence available on viability, we note the references to specific evidence on the viability of the New Garden Settlement. We also note the references to the work undertaken by BPS in respect of amendments to the Community Infrastructure Levy Draft Charging Schedule and evidence it provides in respect of the proposals at Sellindge, along with the New Garden Settlement. We would be grateful if you could provide a copy of the relevant report, in order for us to understand more fully the nature of this evidence.
3. Whilst we appreciate that proposals benefit from planning permission and/or are contained within the existing Core Strategy, we still consider it important for us to have a clear understanding of evidence which supports their inclusion, through the plan making process, as strategic site allocations or broad locations in the Core Strategy Review, including in terms of viability. Can you confirm what specific evidence there is in relation to viability for each of the other strategic site allocations or broad locations (i.e. other than the New Garden Settlement) as a whole, which has informed their inclusion in the Core Strategy Review.
4. There are a number of specific policy requirements that would be applied to development proposals as a result of the Core Strategy Review. These relate to the individual strategic site allocations and broad locations, but also generally across the District (particularly Policies CSD1, CSD2 and CSD5). We will of course need to consider whether such policy requirements are justified and as part of that consideration take account of evidence on the effect they would have on the viability of development. On the basis of the submitted documents and your response to our initial letter, it is not clear to us what evidence there is, or indeed if there is evidence, which demonstrates that development would be viable with the range of policy requirements applied.

5. Our concerns relate firstly to requirements for affordable housing provision and the mix, type and size of housing as set out in Policies CSD1 and CSD2 and also as applied specifically to the New Garden Settlement and Policies SS10, SS11, CSD8 and CSD9.
6. We also have concerns in respect of the requirements for water efficiency. As recognised in Paragraph 5.65 of the Core Strategy Review, the optional higher standard for water efficiency is 110 litres per person per day (compared with the mandatory standard set out in Building Regulations of 125 litres per person per day). In line with the Planning Practice Guidance, this higher standard should only be set where there is a clear local need and the assessment of this includes consideration of the impact on viability and housing supply. We would be grateful therefore if you could confirm whether there is specific evidence in relation to the effect of these requirements on the viability of development generally across the District but also where appropriate, as they are applied to individual proposals within the Core Strategy Review. If there is not such evidence, we would be grateful for your views as to how the situation can be addressed, including potentially through further work being undertaken during the examination and the timescale for such work.
7. In relation to the issue of water efficiency, there is no basis in national policy or the Planning Practice Guidance to go beyond the optional standard of 110 litres per person per day. With this in mind we note that Policies SS8, SS10, SS11 and CSD9 all require a standard of 90 litres per person per day. On this specific issue we would be grateful for your views as to the justification for this approach and the consistency with national policy.

Sustainability Appraisal

8. We note at paragraphs 5.1-5.6 of your response that the Sustainability Appraisal (SA) of Policies SS5, SS10, SS11, CSD3, CSD4, CSD6, CSD7 and CSD8 is contained within the SA report of the 2013 Core Strategy as you consider these policies have not significantly changed since 2013. Nonetheless, the submitted Core Strategy Review is being examined afresh and for the purposes of this examination, is a new plan. As such, 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.
9. Therefore, we would be grateful if the SA of these policies and their reasonable alternatives could be carried out and reported on at the earliest opportunity and provided to the examination as an addendum to the SA report.
10. If you have any specific queries relating to our requests above, please raise these with us via the Programme Officer. We would hope that neither of the issues discussed above and any additional work that may be required will unduly delay the examination process and it is our intention to progress to issuing Matters, Issues and Questions shortly.

Yours sincerely,

Kevin Ward and Philip Mileham

INSPECTORS