

**Dover Local Plan Regulation 19 Consultation.**  
**Kent County Council Response (November 2022)**

Policy/Paragraph	Commentary
	<p>Kent County Council (KCC) is committed to working with the District Council and other key stakeholders to ensure that sustainable growth is supported by necessary infrastructure – that is planned for, funded and delivered in a timely manner, ahead of housing / commercial growth where required – ensuring an ‘Infrastructure First’ approach to development. An “Infrastructure First” approach is embedded in the Kent and Medway Infrastructure Proposition, a proposal that seeks to enable accelerated housing delivery, which is focussed on building the right homes in the right places and providing the public services, transport infrastructure, jobs and homes that residents will need now and in the future. To deliver sustainable development, close working and a collaborative approach with all key stakeholders will be crucial – taking in to account all necessary infrastructure and services required to deliver robust and resilient communities during the plan period and beyond within the District – whilst also considering any cross boundary, strategic implications of growth. The County Council would therefore welcome continued engagement.</p> <p>As the Local Plan progresses, the County Council would value timely engagement in the shaping and inputting, as appropriate, into the draft Statement of Common Ground to ensure that all cross-boundary and strategic matters are properly and clearly addressed.</p> <p>Please see a summary of the strategic issues raised:</p> <ul style="list-style-type: none"> <li>• KCC is encouraged by the fact that Heritage features so prominently in the Vision.</li> <li>• It welcomes the amendments to reflect the Rights of Way Network.</li> <li>• It supports the vision that necessary infrastructure is required to support the housing growth.</li> <li>• KCC have recommended amendments to wording and have also suggested additions to some of the policies put forward. We hope these changes either help to make policies clear and in some cases provide more flexibility.</li> <li>• They have suggested that reference to a number of the following Council’s documents should be included: <ul style="list-style-type: none"> <li>○ the County Council’s Right of Way Improvement Plan</li> <li>○ Kent and Medway Low Emissions Strategy</li> <li>○ County Council’s Environment Strategy</li> <li>○ Kent’s Plan Bee</li> </ul> </li> <li>• KCC would also encourage further car free development.</li> <li>• They would hope that the Dover Fastrack project is reflected in policy.</li> <li>• They also raise some concerns in regard to safeguarding and waste linked to Policy SA3 and Policy DM8.</li> <li>• They would like further dialogue in regard to how further highway related evidence is produced.</li> <li>• They consider that an historic landscape characterisation assessment is carried out in order to fully appreciate the landscape character and incorporate it into green Infrastructure effectively.</li> <li>• KCC would suggest a Transport Strategy for the District.</li> <li>• They would also ask that further discussions took place with Kent Highways before the IDP is published.</li> </ul>
<b>Introduction</b>	
	<p><u>Public Rights of Way (PRoW):</u> As a general statement, the County Council is keen to ensure that their interests are represented within the local policy frameworks of the Districts and Boroughs in Kent. KCC is committed to working in partnership with Local District Councils to achieve the aims contained within the ‘Rights of Way Improvement Plan 2018 – 2028 (ROWIP)’. As the Local Highway Authority, KCC promotes the protection and enhancement of the PRoW network and, experience shows that local planning policy support for the work it does is mutually beneficial in both protecting the network and negotiating enhancements to it, through new development.</p> <p>In respect of PRoW, the County Council supports the draft Regulation 19 Local Plan and it welcomes the amendments made to reflect the PRoW network following the County Council’s response to the Regulation 18 Consultation on 17 March 2021. However, there is still no reference to the County Council’s Rights of Way Improvement Plan (ROWIP) and KCC would emphasise again that reference to the ROWIP is included to enable the successful partnership working to continue to deliver improvements to the District’s PRoW network.</p>
<b>2.1 Overarching Vision</b>	<p><u>Heritage Conservation:</u> The County Council welcomes Dover’s heritage feature so prominently in the Vision. Dover does indeed have a wealth of historic sites that can be used to drive regeneration, tourism and wellbeing in the District in the various ways highlighted in the Dover Heritage Strategy</p>
<b>2.2 Strategic Objectives</b>	<p><u>Heritage Conservation:</u> The County Council welcomes the commitment of the District Council to conserving the heritage of Dover, recognising that heritage assets are a finite resource and the contribution that they make to life and well-being in the district.</p>

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<b>Strategic Policies</b>	
<b>SP1 - Planning for Climate Change</b>	<p><a href="#">Kent and Medway Energy and Low Emissions Strategy</a> seeks to ensure that the decisions and plans embrace clean growth and allow the development of a clean, affordable and secure energy future – the County Council would recommend consideration of this strategy and the <a href="#">County Council's Environment Strategy</a> during the development of the Local Plan for the Borough,</p> <p><u>Development Investment:</u> The County Council supports the objective of promoting quality design in the built environment. The County Council supports the objective of promoting quality design in the built environment and actively encourages well designed places that consider and prioritise local context; distinctive identity; coherent built form; high-quality placemaking; intelligent movement and connectivity; sustainable homes and buildings; lifetime use; and preserves natural resources.</p> <p>The County Council requests that allocations which include education provision, designs in sustainable transport routes to and from the school site planned in order that sustainable travel can be supported, including walking and cycling routes for residents of the new development</p>
<b>SP2 - Planning for Healthy and Inclusive Communities</b>	<p><u>Development Investment:</u> The County Council welcomes paragraph 1 of this policy, and the County Council commits to providing assessment of County infrastructure contributions in order to mitigate the impact of new development on existing services.</p> <p>The County Council requests that the wording paragraph 1 of the policy is broadened to encompass social care – a service which is requiring ever greater investment as a result of our ageing population and one which is not necessarily covered by the reference to health care and community. The inclusion is demonstrated below.</p> <p><i>1. Ensuring that new development is well served by services and facilities (for example, education, health <b>and social care</b>, community, cultural facilities, play youth, recreation, sports, faith and emergency facilities) and that a mix of uses are provided in new development that support daily lift.</i></p> <p>The County Council emphasises the importance of ensuring that all new and existing community facilities are made as accessible as possible – for example through the provision or retro-fit of Changing Places.</p> <p>With reference to paragraph 3 of the policy, the County Council will consider the use of county developer contributions to increase the capacity of existing community facilities if they are considered appropriate to deliver services which meet the needs of local residents at the time of needs.</p> <p>The County Council also supports the policy that seeks to ensure that new developments are designed to be safe and accessible, to minimise the threat of crime and improve public safety.</p> <p>The County Council supports the objective of promoting quality design in the built environment and would recommend reference is made to the emerging County Council Design Guide which promotes the principles of quality design in new development.</p>
<b>SP3 - Housing Growth</b>	<p><u>Development Investment:</u> The County Council welcomes the commitment to resist development that cannot be supported by the necessary infrastructure and services or that would result in a loss of services facilities.</p> <p>The County Council would wish to emphasise the necessity to provide the appropriate infrastructure mitigation in timely manner to support housing growth provision in the district over the plan period. The County Council has provided detailed comments on the Infrastructure Delivery Plan within this response.</p>
<b>SP4 - Residential Windfall Development</b>	<p><u>Development Investment:</u> Any impact of windfall development on County Council infrastructure and services would need to be mitigated and KCC will request contributions as applications for windfall development are prepared and submitted.</p>
<b>3.82 Strategic Policy 5 - Affordable Housing</b>	<p><u>Highways and Transportation:</u> The aspiration for delivery of 30% affordable housing outside the Dover Urban Area is noted, however, it is essential that the viability of individual sites identified as being liable for significant highway infrastructure provision is clarified to sufficient detail to manage stakeholder expectations at the earliest possible juncture, which will potentially speed up future development planning decisions. Such an approach will also assist KCC in making informed infrastructure planning/funding decisions at the earliest possible juncture.</p>

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<b>SP7 - Retail and Town Centres</b>	<u>Development Investment:</u> With reference to paragraph 4 referring residential provision in and on the edge of town centres across the main towns of Dover, Deal and Sandwich – additional households in these locations will require a proportionate increase in infrastructure provision, commensurate with the profile of occupants/residents.
<b>SP8 - Dover Town Centre</b>	<p><u>Highways and Transportation:</u> The County Council recommends that this policy could further encourage car-free development within the Town Centre where existing and future controlled parking zones are present, to reduce unnecessary car-based journeys, especially from Whitfield.</p> <p><u>Heritage Conservation:</u> The County Council welcomes see General Principle 5 which highlights the role that dover’s heritage can play in successful development, and which links the policy to the forthcoming Supplementary Planning Document (SPD) for the archaeology of Dover town.</p> <p><u>Development Investment:</u> The County Council recommends reference to the fact that any increase in households in Dover town centre will require a proportionate increase in infrastructure provision, commensurate with the profile of occupants/residents.</p>
<b>SP9 - Deal Town Centre</b>	<p><u>Heritage Conservation:</u> The County Council welcomes consideration of the role of the historic environment recognised as recognised in paragraph 4.</p> <p><u>Development Investment:</u> With reference to paragraph 1, any increase in households in Deal town centre will require a proportionate increase in infrastructure provision, commensurate with the profile of occupants/residents.</p>
<b>SP10 - Sandwich Town Centre</b>	<p><u>Heritage Conservation:</u> The County Council welcomes consideration of the role of the historic environment recognised as recognised in paragraph 4.</p> <p><u>Development Investment:</u> The County Council recommends reference to the fact that any increase in households in Sandwich town centre will require a proportionate increase in infrastructure provision, commensurate with the profile of occupants/residents.</p>
<b>SP11 - Infrastructure and Developer Contributions</b>	<p><u>Highways and Transportation:</u> The Local Plan could be more succinct in its approach to transport infrastructure, by providing a level of traffic/trip impact assessment and a subsequent mitigation strategy to inform site by site policy and specifically commit linked development sites to related infrastructure.</p> <p>Whilst an element of overarching policy is required to encompass any windfall or opportunity sites that might be identified throughout the lifetime of the Local Plan, the wording of the policy does not provide sufficient indication of when infrastructure will be sought. Reference to site-by-site viability is noted, however it is essential that sufficient detail is included within the whole plan viability assessment, to ensure that the final site selection provides a realistic picture of the prospects of the county council receiving infrastructure contributions in the future. This also includes a realistic indication as to the level of affordable housing likely to be secured to assist in speeding up the development planning process at planning application stage.</p> <p>KCC would welcome further constructive dialogue with Dover District Council in identifying these requirements as the process moves forward and as further highway related evidence is produced.</p> <p><u>Development Investment:</u> The County Council welcomes the inclusion of County Council infrastructure and services as <i>Types of Infrastructure</i> within the explanatory paragraphs for this policy.</p> <p>Where viability evidence is presented by the applicant which may have a subsequent impact on mitigation for necessary county infrastructure, KCC requests that it is consulted by the District Council at the earliest opportunity.</p> <p>The County Council operates a network of 19 Household Waste and Recycling Centres, this should be corrected within paragraph 3.215.</p>
<b>SP12 - Strategic Transport Infrastructure</b>	<u>Highways and Transportation:</u> The A2 corridor is a key consideration within the proposed growth aspirations, it is important that this is reflected in policy, however this could equally form part of a future Transport Strategy for the district, which is absent from this round of consultation. Given the wide-ranging traffic challenges within the district, there would be merit in encompassing highway and transportation matters into a single supporting document. As the Dover Access Project is potentially several years away from being completed/clarified in

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	<p>full, it is accepted that mitigation proposals in relation to the A2 corridor will need to be suitably fluid in nature.</p> <p>Modelling forecasts indicate that infrastructure improvements are required on the A256 corridor. Given that this road corridor forms part of the Major Road Network, it would be prudent to consider policy to safeguard future upgrading opportunities on this road corridor.</p> <p>The policy should also specifically allow for the provision and maintenance of bus shelters under the heading of Bus Infrastructure.</p> <p><u>PRoW</u>: The County Council requests that this policy includes consideration for how walking and cycling opportunities, including the PRoW network, can be improved and how this investment in Active Travel will complement the road, rail and bus networks. The County Council is in discussion with National Highways for designated funding and funding through section 106 agreements should also be explored.</p>
<p><b>SP13 - Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets</b></p>	<p><u>Biodiversity</u>: Section D of this policy states: <i>Wintering bird surveys will be required for all sites with high or moderate suitability (as identified in the HRA or subsequent habitat assessment) for qualifying bird species of Thanet Coast and Sandwich Bay SPA and Ramsar Site, Stodmarsh SPA and Ramsar Site and Dungeness, Romney Marsh and Rye Bay SPA, in order to determine their individual and cumulative importance for these species and whether the thresholds of significance are exceeded (greater than 1% of the associated European or international site). In such circumstances, when impacts cannot be avoided, appropriate mitigation in the form of habitat creation and management in perpetuity on-site in the first instance, or through provision of strategic sites for these species elsewhere within Dover District, will be required. Permission will only be granted when proposals for appropriate, adequate and achievable mitigation measures have been agreed. All such necessary mitigation will need to be fully functional prior to any development which would affect significant numbers of SPA or Ramsar Site birds.</i></p> <p>Some of the allocated sites are close to the border of other districts (such as PRE017 Site north-west of Appletree Farm, Stourmouth Road) therefore it might not be appropriate for the habitat creation and management to be carried in the Dover district. For example for site PRE017 Site north-west of Appletree Farm, Stourmouth Road it may be more appropriate for habitat creation/management works to be carried out in Canterbury. It is therefore recommended that the policy allows for flexibility for works to be carried out outside there district where it may be appropriate.</p> <p>The County Council recommends that Section H requires details of compensation for loss or damage to locally identified biodiversity assets to be submitted as part of planning applications.</p> <p>The County Council recommends reference to <a href="#">Kent's Plan Bee</a>, a pollinator action plan developed by the County Council that seeks to improve the food sources and general habitat for pollinators.</p>
<p><b>SP14 - Enhancing Green Infrastructure and Biodiversity</b></p>	<p><u>PRoW</u>: The PRoW network should be included as part of the aim to protect the landscape, and against significant visual impact, and loss of air quality which is a significant part of user enjoyment and the wider natural environment. Historical routes are part of the rural heritage and the "landscape character and distinctiveness of the coastline" – reference should be made to the National Trails North Downs Way and the England Coast Path and other historic routes across the District.</p> <p><u>Heritage Conservation</u>: If properly designed, green infrastructure has the potential to help new development be better integrated into the existing rural and urban landscape by ensuring that it fits into the grain of what is already there. The pattern of roads, tracks and lanes in Dover has been used for centuries to link Dover's towns, villages, hamlets and countryside. By taking advantage of these existing and historic routeways people will be able to move through the District while retaining the historic geography of the region, but also following routes more likely to be accompanied by historic hedgerows and planting. This has the potential to unite heritage and ecology to help people access and enjoy green infrastructure features more easily and naturally.</p> <p>Using historic routeways also allows Green Infrastructure (GI) designers to incorporate heritage assets to provide features of interest. In turn this will help people accessing the GI to become more aware of and value Dover's heritage which will in turn assist their conservation and re-use. For example, along the cliffs east of Dover town there is an internationally significant group of fortifications. If the GI were to feature these it would help raise their profile to assist with conservation whilst supporting tourism.</p> <p>To fully appreciate Dover's landscape character and incorporate it into green infrastructure effectively, it is first important to understand it. The main method for investigation historic landscape character is by historic landscape characterisation. This is a method of assessing the pattern of tracks, lanes, field boundaries and other features that comprise the historic</p>



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	<p>character of the modern landscape.</p> <p>The <a href="#">Kent Historic Landscape Characterisation (2001)</a> has identified the broad historic character of the landscape of Kent but more detailed refinement is needed to bring the baseline data for Dover up to the standard of areas such as the High Weald and the Hoo Peninsula which have more detailed and relevant data. The County Council would welcome further discussion with the District Council on this.</p> <p>The text rightly highlights the contribution of green infrastructure to health. Historic England has released research that demonstrates how heritage actively supports health and well-being through contributing to a generally more attractive environment, allowing activities that encourage participation and inclusion and by encouraging outdoors activities which could be referred to within the Local Plan.</p>
<p><b>3.295 to 3.297</b>  <b>Strategic Policy 15 - Protecting the Districts Historic Environment</b></p>	<p><u>Heritage Conservation:</u> The County Council welcomes the clear explanation of why the historic environment policies in the Local Plan have been selected and broadly support these decisions. There is a case to be made for a specific policy on the Archaeology of Dover Town, but the County Council notes the commitment to develop an SPD for this.</p>
<p><b>3.296 Strategic Policy 15 - Protecting the Districts Historic Environment</b></p>	<p><u>Heritage Conservation:</u> It should be noted that there are currently 7 Registered Parks and Gardens (note the corrected term - not Historic Parks and Gardens) on the National Heritage List for England. The Kent Historic Environment Record now lists more than 14,000 non-designated entries for Dover (however – not all appear online).</p>
<p><b>3.302 Strategic Policy 15 - Protecting the Districts Historic Environment</b></p>	<p><u>Heritage Conservation:</u> The County Council welcomes the commitment to developing a Local List which is also one of the recommendations of the Heritage Strategy. KCC would encourage the District Council to ensure that the list is eligible to the full range of heritage assets including buildings, archaeological sites and monuments, green spaces and landscapes so that all aspects of Dover's past can be recognised. This was also a recommendation of the Dover Heritage Strategy (R14). In addition to the Local List, however, the Heritage Strategy recommended that the District Council develops a Register of Heritage Assets at Risk (R15). This would complement a Local List and allow assets at most risk to be highlighted and to potentially receive more focused attention. The County Council recommends that such a register be created in addition to the Local List.</p>
<p><b>SP15 - Protecting the District's Historic Environment</b></p>	<p><u>Heritage Conservation:</u> KCC welcomes the inclusion of an entire chapter dedicated to the Historic Environment. Dover's heritage is of an exceptional quality and has a very important part to play in the future life of the District, and it essential that it is given the recognition it deserved.</p>
<p><b>Site Allocations</b></p>	
<p><b>General Comments</b></p>	<p><u>Highways and Transportation:</u> There are several draft allocation sites that are relatively remote from good quality sustainable walking, cycling and public transport options. Therefore, site specific public transport and sustainable transport strategies should be considered at this stage. This will encourage a coordinated approach to public transport provision (and secured through the Infrastructure Delivery Plan), subsequently assisting strategic development planning decisions in the future.</p>
<p><b>4.10 Garden village principles</b></p>	<p><u>Heritage Conservation:</u> To ensure that settlements of the 'garden village' scale do not appear to be dropped into the landscape with no real reference to what is already there, it is essential that such new development works with the grain of the existing landscape and settlements so that they appear to be a natural expansion rather than an entirely new construct. To that end, it is important that any heritage assets, in the form of historic buildings or archaeological monuments, and the historic landscape, in the form of the pattern of tracks, lanes and field boundaries, are integrated into the masterplans for the new villages. At present this is not reflected in the text and KCC would recommend that the text needs to be strengthened so that the heritage of the new settlement is fully integrated into the new design.</p>
<p><b>4.21 Movement and Highways</b></p>	<p><u>PRoW:</u> The PRoW network should be included in all Transport Assessments and therefore reflected in Policy T12 as part of sustainable measures within Travel Plans.</p>
<p><b>4.68 SAP1 Whitfield Urban Expansion</b></p>	<p><u>Development Investment:</u> The County Council welcomes the acknowledgement that the necessary community and social infrastructure including new schools and community facilities will need to be provided. Further specific comments on education, waste and community facilities at Whitfield are provided below under the Infrastructure Delivery Plan (IDP).</p> <p>The County Council ask specifically that the Whitfield SPD includes plans for cycling and walking routes to schools within the development to each of the designated school sites, as part of the necessary community and social infrastructure provision and sustainable transport measures.</p> <p>The County Council awaits the revised SPD which will set out the quantum and distribution of land uses, an updated phasing and delivery strategy.</p>

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<p><b>SAP1 - Whitfield Urban Expansion</b></p>	<p><u>Highways and Transportation:</u> A revised SPD document is essential to the consideration for the Whitfield Urban Expansion (WUE), however this needs to be produced as soon as possible to avoid a potential policy vacuum occurring for any emerging development proposals. There should be a clearer definition over which infrastructure and phasing requirements will be encompassed within the Local Plan Policy and which will be addressed within the future SPD, as this could have a direct impact on modelling forecasts. It is essential that a specific policy is included to secure the future route of the Fastrack service.</p> <p>It is stated that the SPD should be prepared by the landowner, however there are several stakeholders that have land interests within the WUE, therefore, it is essential that they are all involved in the process where possible. A Statement of Common Ground should be encouraged with relevant land stakeholders to ensure that a joined-up approach to the SPD review is achieved. This may require the use of equalisation agreements and mechanisms to ensure that ransom situations between development land parcels are avoided.</p> <p>Travel Plans for any portion of development should include community engagement with new residents for the Fastrack service, with service updates, opportunities for feedback and incentives for use.</p> <p><u>PRoW:</u> The County Council welcomes reference to upgrades as well as improvements to existing routes to address network fragmentation.</p>
<p><b>SAP2 - White Cliffs Business Park (Phases 2, 3, and 4), Whitfield</b></p>	<p><u>PRoW:</u> The County Council would request inclusion of EB10 within this policy.</p>
<p><b>SAP3 – Dover Waterfront</b></p>	<p><u>Minerals and Waste:</u> To deliver economic growth in the district, this may have an impact on mineral safeguarding facilities.</p> <p>Paragraph 3.117 states:</p> <p><i>3.117 Furthermore, to achieve the aspirations set out in the Council's Growth Strategy and deliver a step change in the delivery of economic growth in the District, over and above the level of employment need identified in the EDNA, further allocations are required. Sites are therefore allocated at Dover Waterfront, Fort Burgoyne and the Citadel, Western Heights in Dover, in addition to the former Snowdown Colliery in Aylesham, in accordance with this strategy. These sites offer significant opportunity to regenerate brownfield sites in key locations in the District and deliver flexible employment uses, to achieve a higher level of job growth and help provide additional flexibility and choice to the market over the Plan period. No floorspace allowance has been included for The Citadel, Fort Burgoyne and Snowdown Colliery as these are brownfield sites allocated for regeneration, and the mix of development and floorspace requirements will need to be determined through the planning application process in accordance with the policies in the Local Plan.</i></p> <p>The 'Dover Waterfront' is a major element of the Local Plan's regenerative growth area. The relevant Policy for this area being SAP3-Dover Waterfront.</p> <p>The area has two safeguarded mineral facilities, in close association with each other, the Dunkirk Jetty marine aggregates importation wharf and a concrete batching plant to its immediate west. The extract from Google maps below shows the mineral importation wharf in operation and the 'Gallagher Aggregates Dover Concrete Plant'. Both are safeguarded by virtue of policies CSM:6 Safeguarded Wharves and Rail Depots and CSM 7: Safeguarding Other Mineral Plant Infrastructure of the Kent Minerals and Waste Local Plan 2013-30 (as Early Partially Reviewed and adopted in 2020).</p> 

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	<p>Policy SAP3 - Dover Waterfront lists the regenerative objectives for the area, and the assessments that will be required in bringing forward these developments. Including such assessments for archaeology, air quality, noise etc but it omits any assessment of the safeguarding status of these facilities. It is assumed that they would not be retained as part of the Western Docks regeneration. This matter is also not mentioned in the policy's explanatory paragraphs 4.92 to 4.100 – however, it is assumed, in the absence of any information to the contrary, that these safeguarded mineral facilities would be threatened with direct loss by the Plan's regenerative objectives, as their retention would be incompatible with the Plan's regeneration objectives outlined in the policy.</p> <p>An Infrastructure Assessment (IA) is required to assess whether the loss of these safeguarded facilities is justified against the exemption criteria of Policy DM 8 of the KMWLP. As a general matter, wharf capacity, once lost, is very unlikely to be able to be replaced at another location, of equal or superior operational capacity. Therefore, the County Council, as Minerals and Waste Planning Authority default position is to seek to retain these facilities and ensure regenerative development allows for this. The IA's should demonstrate that the proposed development will meet the requirements of Policy DM 8 and allow the lawful and viable operation of these facilities to be able to be continued.</p> <p><u>PRoW</u>: It is requested that this development does not affect the route of the National Trail.</p>
<b>4.104 SAP4 - Dover Western Heights (Citadel)</b>	<p><u>Heritage Conservation</u>: As the text notes, a master plan for the Western Heights was adopted into policy by Dover District Council in 2015. An action plan was contained in the document but almost no progress has been made since that time. In the discussions that took place during the preparation of the master plan, it was understood that the action plan needs to be resourced if it is to be delivered and that a designated officer would need to be given responsibility for delivery. The County Council would urge the District Council to re-engage with the action plan so that it can be taken forward and the future of the monument be secured.</p>
<b>SAP4 - Dover Western Heights Fortifications Scheduled Monument and Conservation Area</b>	<p><u>PRoW</u>: The County Council recommends the policy includes reference to PROW network and sustainable access improvements as outlined in ROWIP</p> <p><u>Heritage Conservation</u>: The County Council supports this policy in respect of heritage conservation matters.</p>
<b>SAP8 - Land adjacent to the Gas Holder, Coombe Valley Road, Dover (DOV022B)</b>	<p><u>PRoW</u>: The County Council requests reference to improvements to the EBX16 link to the school within this policy.</p>
<b>SAP9 - Land at Barwick Road Industrial Estate, Coombe Valley, Dover (DOV022E)</b>	<p><u>PRoW</u>: The County Council requests reference to improvements to EB16 Bridleway for connectivity within this policy.</p>
<b>SAP11 - Westmount College, Folkestone Road, Dover (DOV026)</b>	<p><u>PRoW</u>: The County Council requests specific reference is made to the improvements to EBX4 within this policy.</p>
<b>SAP13 - Dover Small Housing Sites</b>	<p><u>PRoW</u>: The County Council recommends that all Coombe Valley proposed sites working together can create a great pedestrian and cycle route and the Local Plan should therefore allow for the investigation and upgrading of Public Footpaths EB7, EB6 &amp; EB17 to Bridleway to link to EB16.</p>
<b>SAP16 - Deal Small Housing Sites</b>	<p><u>PRoW</u>: The County Council recommends that policy specifically references improvements to Public Footpath ED49.</p>
<p><b>SAP 17 - Land south of Stonar Lake and to north and east of Stonar Gardens, Stonar Road, Sandwich (SAN004)</b></p> <p><b>SAP 18 - Sandwich Highway Depot/Chippie's Way, Ash Road, Sandwich (SAN006)</b></p>	<p><u>Development Investment</u>: The County Council welcome the inclusion of policy SAP21 to safeguard land adjacent to Sandwich Technology School. It should also be noted by the District Council that land may be required for primary school expansion in Sandwich.</p> <p><u>PRoW</u>: The issue of PROW ES3 link to / Sandwich bridge due to river erosion should be acknowledged by the District Council as there is danger that access to coast, England Coast Path, and a direct link out of Sandwich will be lost.</p>

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<p>SAP 19 - Land at Poplar Meadow, Adjacent to Delfbridge House, Sandwich (SAN007)</p> <p>SAP 20 - Woods' Yard, rear of 17 Woodnesborough Road, Sandwich (SAN008)</p> <p>SAP 21 – Land adjacent to Sandwich Technology School Deal Road, Sandwich (SAN013)</p>	
<p>SAP24 - Land to the South of Aylesham (AYL003)</p>	<p><u>PRoW</u>: The County Council welcomes the inclusion of reference to the PROW network</p>
<p>SAP25 - Aylesham Development Area</p>	<p><u>Development Investment</u>: The County Council references comments made on the IDP within this response in respect of this site.</p> <p><u>PRoW</u>: The County Council requests specific mention of connection to the PROW network within this policy.</p>
<p>SAP26 – Former Snowdown Colliery, Aylesham</p>	<p><u>PRoW</u>: The County Council requests specific mention of connection to the PROW network within this policy and requests that the Transport Assessment includes consideration of the PRoW network.</p>
<p>SAP28 - Land between Eythorne and Elvington (EYT003/EYT009/EYT012)</p>	<p><u>PRoW</u>: The County Council requests specific mention of connection to the PROW network including upgrades for walkers and cyclists within this policy.</p>
<p>SAP34 - Land at Woodhill Farm, Ringwould Road, Kingsdown</p>	<p><u>PRoW</u>: The County Council requests that the Transport Assessment must include consideration of Bridleways ER21, ER20 and PROW network offsite,</p>
<p>SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House, Shepherdswell</p>	<p><u>PRoW</u>: The County Council requests that the policy includes reference to Footpath ER78 improvements for connection to North Downs Way.</p>
<p>SAP37 - Shepherdswell Small Housing Sites</p>	<p><u>PRoW</u>: The County Council requests that the policy includes reference to improvements required to Footpath ER81.</p>
<p>SAP39 - Land to the west of Townsend Farm Road St. Margaret's at Cliffe (STM007 &amp; STM008)</p>	<p><u>PRoW</u>: The County Council requests that the policy includes reference to improvements required to Footpath ER21.</p>
<p>SAP41 - Footpath Field, Staple Road, Wingham (WIN014)</p>	<p><u>PRoW</u>: The County Council requests that the policy includes reference to better pedestrian connectivity.</p>
<p>SAP44 - Land to the east of GreatCauldham Farm, Capel-le-Ferne (CAP006)</p>	<p><u>PRoW</u>: The County Council requests that the policy includes reference to Bridleways ER253 252 and the required improvements to support connectivity.</p>
<p>SAP46 - Land adjacent Langdon Court Bungalow, The Street, East Langdon (LAN003)</p>	<p><u>PRoW</u>: The County Council welcomes the inclusion of ER45/56/57 improvements within this policy.</p>
<p>SAP47 - Land adjacent to Lydden Court Farm, Church Lane,</p>	<p><u>PRoW</u>: The County Council requests that the policy includes reference to improvements required to ER116 and ER115.</p>



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<b>Lydden (LYD003)</b>	
<b>SAP48 - Apple Tree Farm and north west of Apple Tree Farm, Stourmouth Road, Preston (PRE003 PRE016 and PRE017)</b>	<u>PRoW</u> : The County Council requests that the policy includes reference to the improvements required to Footpath EE480.
<b>SAP49 - Worth Small Housing Sites</b>	<u>PRoW</u> : The County Council requests that improvement pedestrian links are provided to the Church and School in respect of Public Footpath ER250  Restricted Byway EE237A, Bridleway EE236, Footpath EE235A will required consideration through well managed Active Travel Plans to upgrade, improve and incorporate.
<b>Development Management Policies</b>	
<b>5.16 CC2 - Sustainable Design and Construction</b>	<u>Heritage Conservation</u> : The County Council was pleased to see that the text highlights the role that historic buildings can play in addressing climate change and refers to Historic England guidance. Old buildings can sometimes be energy efficient than newer ones and of course have already been built. Thus, it may take fewer overall resources to adapt an old building than to demolish it and build a completely new one.
<b>5.43 CC6 - Surface Water Management</b>	<u>Heritage Conservation</u> : The County Council was pleased to see that the text identifies potential impacts on the historic environment from SUDS schemes. Sustainable Drainage Schemes (SuDS) may have both direct and indirect impacts on the historic environment. Direct impacts could include damage to known heritage assets – for example if a historic drainage ditch is widened and deepened as part of SuDS works. Alternatively, they may directly impact on unknown assets such as when SuDS works damage buried archaeological remains. Indirect impacts are when the ground conditions are changed by SuDS works, thereby impacting on heritage assets. For example, using an area for water storage, or improving an area's drainage can change the moisture level in the local environment. Archaeological remains are highly vulnerable to changing moisture levels which can accelerate the decay of organic remains and alter the chemical constituency of the soils. Historic buildings are often more vulnerable than modern buildings to flood damage to their foundations.  When SuDS are planned it is important that the potential impact on the historic environment is fully considered and any unavoidable damage is mitigated. This is best secured by early consideration of the local historic environment following consultation with the Kent Historic Environment Record (HER) and by taking relevant expert advice. Kent County Council has recently produced advice for SUDS and the historic environment. It provides information about the potential impact of SuDS on the historic environment, the range of mitigation measures available and how developers should proceed if their schemes are believed likely to impact on heritage assets.
<b>CC8 - Tree Planting and Protection</b>	<u>Heritage Conservation</u> : The County Council welcomes consideration of the historic aspect of woodlands recognised in this policy.
<b>PM1 - Achieving High Quality Design, Place Making and the provision of Design Codes</b>	<u>Highways and Transportation</u> : The policy reference to prioritising sustainable transport choices is noted, although this should specify high quality pedestrian and cycle infrastructure to the <a href="#">LTN 1/20</a> standard.  <u>PRoW</u> : Reference to Active Travel, the PROW network and ROWIP must be included within this policy.  <u>Development Investment</u> : The County Council supports the objective of promoting quality design in the built environment.  <u>Heritage Conservation</u> : The County Council was pleased to see the historic environment highlighted in paragraph 1a of this policy.
<b>PM2 - Quality of Residential Accommodation</b>	<u>Development Investment</u> : The County Council welcomes the commitment set out in PM2 and at section 6.9 which will enable people to remain in their homes and live independently throughout their lives as set out below.  The Department for Levelling Up, Housing and Communities identified in June 2019 guidance <i>Housing for older and disabled people</i> , that the need to provide housing for older & disabled people is critical. Accessible and adaptable housing enables people to live more independently and safely, providing safe and convenient homes with suitable circulation space, bathrooms, and kitchens. Kent Adult Social Care requests these dwellings are built to Building Reg Part M4(2) standard (as a minimum) to ensure that they remain accessible throughout the lifetime of the occupants, meeting any changes in the occupant's requirements.
<b>PM4 - Sports Provision</b>	<u>Sport and Recreation</u> : With reference to paragraph 6.57, the County Council would draw attention to the Lawn Tennis Association (LTA) who currently have funding to support

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	<p>improvements and refurbishments to community tennis facilities. Active Kent, a County Council partner, would be happy to introduce a discussion if this connection has not already been established.</p> <p>Paragraph 6.58 which references the needs identified within the LFFP's around 3G pitches is welcomed - but it is noted that there is potential for further work to be undertaken around opening school facilities for community use. Within Active Kent, funding has been received from Sport England via 'Open Schools Facilities Funding' to support schools with the financial implications around opening their facilities outside of school hours. Active Kent would be willing to work with the District Council to identify school to target as a result of their planning and consultation.</p> <p>Active Kent is keen to understand how the service can support sport and physical activity in the district. Active Kent has access to internal funding streams that could support the development of new initiatives in Dover and are able to offer advice and support on capital developments and look to address shortfall on projects.</p>
<b>PM5 - Protection of Open Space, Sports Facilities and Local Green Space</b>	<p><u>PRoW:</u> The County Council welcomes this policy in respect of PRoW.</p>
<b>PM6 - Community Facilities and Services</b>	<p><u>Development Investment:</u> The County Council welcomes the clarification on the threshold for developer contributions. It is noted that in paragraph 2 of this policy, which considers the potential loss of community facilities, the County Council requests the following amendment:</p> <p><i>Across the district as a whole, planning permission will only be granted for proposals involving the loss or change of use of community services or facilities in the following <b>exceptional</b> circumstances</i></p> <p>The County Council requests that the reference in paragraph 6.98 to shared facilities should also be explicitly incorporated into this policy.</p>
<b>H1 - Type and Mix of Housing</b>	<p><u>Development Investment:</u> The County Council is supportive of this policy.</p>
<b>H2 - Rural Local Needs Housing</b>	<p><u>PRoW:</u> Further consideration is required in this policy to ensure connectivity for users between existing and new communities.</p>
<b>E1 - New Employment Development</b>	<p><u>PRoW:</u> The County Council recommends the policy includes reference to the need for sustainable Active Travel options, safety for Non Motorised Users (NMUs) on rural roads and sustainable infrastructure to link to transport hubs, and local facilities, avoiding short car journeys.</p> <p><u>Heritage Conservation:</u> The County Council welcomes the inclusion of Kent Farmsteads Guidance referenced in this section.</p>
<b>E4 – Tourist Accommodation and Attractions</b>	<p><u>PRoW:</u> The County Council requests specific reference to sustainable transport options within this section as well as reference to the ROWIP.</p>
<b>10. Transport and Infrastructure</b>	<p><u>Highways and Transportation:</u> The document is relatively silent on policy relating to the emerging Dover Fastrack project (formally known as Dover BRT). It is essential that this extremely important project is reflected in specific policy requirements relating to.</p> <ul style="list-style-type: none"> <li>• Identified routes that should be secured within the Whitfield/Dover areas that are safeguarded for the provision of Fastrack infrastructure.</li> <li>• Funding requirements of bus services and off-site infrastructure (potentially within the Infrastructure Delivery Plan).</li> <li>• Provision of on-site highway routes and complimentary infrastructure.</li> <li>• Strategy for the ongoing maintenance of bus shelter infrastructure, identifying delivery partners and funding opportunities.</li> <li>• Requirements in relation to development phasing and an active policy to avoid ransom between different phases of development.</li> </ul>
<b>T11 - Sustainable Transport and Travel</b>	<p><u>PRoW:</u> The County Council is supportive of this policy.</p>
<b>T12 - Transport Statements, Assessments and Travel Plans</b>	<p><u>PRoW:</u> Transport Assessments and Travel Plans must include consideration of the PRoW network and the ROWIP – this request should be reflected in this policy.</p>

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<b>T15 - Digital Technology</b>	<p><u>Development Investment:</u> The County Council is supportive of this policy. We welcome the intention that all new residential, public and business premises development will have gigabit-capable connections.</p> <p>As required by paragraph 114 of the NPPF, KCC requests that all new residential, commercial and community buildings benefit from the installation of fixed telecommunication infrastructure and High-Speed Fibre Optic (minimal internal speed of 1000mbps) connections to multi point destinations. The infrastructure installed should be capable of connection to commercial broadband providers and maintained in accordance with approved details.</p> <p>The County Council would also draw attention to the proposed Building Regulation Changes in respect of digital technology which will come into effect shortly.</p>
<b>11. The Natural Environment</b>	<p><u>PRoW:</u> The PRoW network should be included as part of the aim to protect the landscape, visual impact, air quality which is a significant part of user enjoyment and the wider natural environment. Historical routes are part of the rural heritage and the “landscape character and distinctiveness of the coastline”. Reference within this policy should therefore be made TO THE National Trails and historic routes around the District.</p>
<b>NE1 - Biodiversity Net Gain</b>	<p><u>Biodiversity:</u> The County Council requests clarity regarding paragraph 2 of the policy – “<i>Biodiversity net gain must be in addition to any form of compensation</i>” and whether this is referring to additionality or stacking, where a piece of land is being used for more than one purpose (for example, carbon capture or nutrient neutrality).</p> <p>Reference should also be made to the adherence to the most recent iteration of the Biodiversity Net Gain metric – which is currently 3.1.</p> <p>In respect of paragraph 11.11, Biodiversity Net Gain is also not intended to be used for nationally or internationally designated sites.</p> <p>The County Council would also draw attention to the work being undertaken by the Kent Nature Partnership in respect of the proposal to secure 20% Biodiversity Net Gain where it may be viable to do so.</p>
<b>12.7 – 12.8 Policy HE1 - Designated and Non Designated Heritage Assets</b>	<p><u>Heritage Conservation:</u> The County Council welcomes the clear description of the purpose and need for a good Heritage Statement to accompany relevant applications. In paragraph 12.8, though, KCC would suggest that in addition to the Heritage Strategy, reference is made to consulting relevant Conservation Area Appraisals (CAA) and to the Dover Archaeological Characterisation for applications in Dover town centre. Both CAAs and the Characterisation should contribute directly to helping applicants reach the understanding necessary to write an effective Heritage Statement.</p>
<b>HE2 - Conservation Areas</b>	<p><u>Heritage Conservation:</u> The County Council supports this policy and the commitment in the preamble to the development of further Conservation Area Appraisals. This was also a recommendation of the Dover Heritage Strategy (R10).</p>
<b>12.32 Policy HE3 - Archaeology</b>	<p><u>Heritage Conservation:</u> The County Council welcomes the commitment to a Dover Town Archaeology SPD. This will help ensure that the outputs of the Dover UAD Project are fully integrated into Local Plan policy and thereby support the protection and enhancement of Dover’s internationally important archaeological remains. It will also help disseminate the understanding of Dover’s archaeology reached in the project, in particular via the Dover Archaeological Characterisation. The SPD should also provide an important toolkit for developers preparing their proposals, planners who need to assess them, and the community wishing to comment on them. This should underpin the management of Dover’s archaeology for many years.</p>
<b>HE4 - Historic Parks and Gardens</b>	<p><u>Heritage Conservation:</u> The County Council is supportive of this policy.</p>
<b>Appendices</b>	
<b>WSP - Dover and Deal Transport Model Local Plan Forecasting Report for Regulation 18</b>	<p><u>Highways and Transportation:</u> The general methodology for the forecasting work has been agreed with the Local Highway Authority. This report provides the high-level impact assessment of the Local Plan growth on the existing highway network in focussed locations. However, it does not at this stage explore potential mitigation measures, which will need to be resolved before a full steer can be provided in relation to the acceptability of the proposed sites.</p> <p>It is noted that the Dover VISUM model does not include coverage of the entire geographical area of Dover and as such some of the proposed allocation sites are located outside of the area of coverage are subsequently assessed using a spreadsheet model approach. Whilst from a consistency basis, ideally, the VISUM model would have been extended to</p>

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	<p>encompass the entire district, in this case a hybrid modelling methodology is an acceptable form of assessment as most of the Local Plan growth is located within the VISUM simulation area and the routing through the network outside of the can be identified relatively efficiently.</p> <p>The Local Highway Authority has the following comments to make on the contents of the report: -</p> <p><i>Executive Summary</i></p> <p>The current methodology of focussing on capacity improvements at Whitfield Roundabout and the Duke of York Roundabout is necessary so that the resulting redistribution of traffic can be considered in full before the scope of further assessment on other parts of the network can be fully scoped and explored. Therefore, the Local Highway Authority would like to reserve the right to review the required scope of further highway assessment.</p> <p>It is understood that Local Junction Modelling was also to include the A258/Deal Rd junction.</p> <p>KCC requires an outline of the strategy for each of the junctions listed in Table 5.</p> <p><i>1 - Introduction</i></p> <p>1.5.1 Manston Airport – It is relevant to highlight the recent DCO decision to reopen and develop Manston Airport in Thanet into a dedicated air freight facility able to handle at least 10,000 air cargo movements per year. The examination process for this development has highlighted that this will generate a material level of additional traffic within the Dover District (particularly on the A256 corridor), although the forecast report is currently silent on this point. Consequently, further sensitivity testing for the airport may now be required to enhance the robustness of this assessment.</p> <p>Consideration should also be given to the impacts of bifurcation of HGV traffic arising from the Lower Thames Crossing and with the potential reassignment of traffic how this could impact Dover's network and create a need for further junction modelling.</p> <p><i>2 - Forecasting Approach</i></p> <p>2.2.1 – The inclusion of just a single forecast year (2040) is noted at this stage, however as the process continues and any further highway mitigation is identified, it may be necessary for interim year assessment to be provided to assist in the identification of necessary infrastructure triggers.</p> <p>2.4.7 – This methodology has been agreed, however it is important to consider the cumulative impact of settlements where there are numerous smaller development sites (less than 100 dwellings) are within close proximity, as this could have a disproportionate impact on certain junctions within a polygon zone. This may include clusters of smaller sites in Wingham, Sandwich, Eastry, Walmer/Kingsdown and St Margaret's-at-Cliffe, which could respectively have unseen impacts on the A257, A256 and A258 corridors.</p> <p><i>3 - Forecast Transport Infrastructure</i></p> <p>3.2.6 – The wording should be updated to reflect that Albert Road link scheme (Court Marsh Road, Deal) has been completed and may need to be included in the forecast scenarios.</p> <p><i>4 - Forecasting Demand</i></p> <p>Table 4-2 – Whitfield Phase 1 (planning reference 10/01010) appears to be missing from this list – Whilst the position stated in section 3.3.6 &amp; 3.3.7 is understood clarification is required as to why the balance of housing up to 800 dwellings is not included in this table. E_1004 (planning reference 10/01011) also requires clarification as the table suggests that this includes new access road on the A256 and link to Archers Court Road, whereas the highway authority understands that this was secured under planning reference 10/01010. Furthermore, S_104 and S_129 have been dropped from the DM scenario whereas they were included previously in the Reg. 18 DM.</p> <p>4.4.7 – 4.4.10 – The proposed growth factors for HGV's are noted and agreed for the purpose of the forecasting report, however it is evident that the longer-term impacts of Brexit and</p>



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	<p>the potential arrangements for associated infrastructure such as the DEFRA Border Control Post may have a bearing on future distribution of HGV traffic on the strategic and local highway network, especially at the Whitfield and Duke of York Roundabouts. Therefore, port-based growth forecasts may need to be reviewed.</p> <p><i>5 - Local Plan Assessment</i></p> <p>5.2.19 - 5.2.23 – The diagram shows areas of the WUE under the potential control of the land promotor, however, does not outline how the remaining sections of the allocation will be accessed. It is recommended that a full access plan is produced to clarify exactly how the entire allocation will come forward. It is essential that access agreements are reached between local plan stakeholders. It is also relevant to point out that no technical drawings have been submitted to ascertain whether the new junction onto A256 is achievable. The stopping up of the existing A256/Sandwich Road priority junction should also be included within this scenario.</p> <p><i>6 - Results</i></p> <p>Figures 6-56 and 6-84 – The DS1 and DS2 assessments indicated that mitigation at the Whitfield Roundabout will lead to the transfer of trips onto less congested routes through Lydden in the AM peaks. Whilst this route is theoretically capable of accommodating some additional traffic flow at a link level, there is a concern that this could lead to strategic port bound HGV traffic rerouting through this part of the road network, which would not be appropriate.</p> <p><i>8 – Local Junction Models</i></p> <p>8.1.1 - It is understood that Local Junction Modelling was also to include the A258/Deal Rd junction.</p> <p>8.1.55 – The proposal for signalling the London Road/Alkham Valley Road would be subject to further technical approval by KCC Highways, although further consideration should be given to the implications of a left-turn ban from Alkham Valley to fully address the departures from design guidance. This would include potential delay, geometry at the London Road/Whitfield Hill roundabout and any foreseen impacts on capacity from U-turns.</p> <p>8.1.76 – The proposal for signalling the Dover Road/Station Road junction would again be subject to further technical approval by KCC Highways.</p> <p>8.2.7 and 8.2.8 – Noted that further discussion is required between DDC and KCC Highways to determine potential improvements at these junctions, we would anticipate that mitigation is agreed prior to publishing the IDP.</p> <p><i>9 - External Local Plan Sites</i></p> <p>Cluster 1 (Aylesham and Wingham)</p> <p>The Junction of Staple Road/B2046 is not included within the network diagram. This junction is subject to peak hour traffic queueing and there are two allocations proposed that access the B2046 via this junction, as such this should be included within the assessment.</p> <p>KCC maintains that the A257/B2046 junction, although limited in what can be achieved in the way of mitigation, should be modelled to inform KCC's position on the allocations within this cluster. All options for mitigation should be considered and discounted with appropriate commentary. An important factor in the consideration of these sites is the significant amount of growth proposed in the Draft Canterbury Local Plan, and we would recommend that Dover District Council works with Canterbury City Council and KCC as Local Highways Authority to fully scope the cumulative impact of both Local Plans on local network, along with the additional options this may present for effective mitigation at Wingham.</p> <p>KCC would recommend that the cluster also incorporates the A257/Preston Hill junction, and that trips leaving/joining the network at Holt Street should be quantified to assess impact on this route to Sandwich.</p> <p>Cluster 2 (Sandwich North &amp; Ash)</p>

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	<p>KCC has concerns that provision of just one point of access in Ash means that turning movements at the Sandwich Road/A257 junction are underestimated.</p> <p>Cluster 3 (Sandwich South)</p> <p>It would seem prudent to extend the model network into Sandwich to assess the cumulative impact of proposed developments in the town.</p> <p>The increase of flows at the A258/Deal Road junction in the PM peak would in my view warrant further modelling to test the capacity of this junction with Local Plan growth.</p> <p>Cluster 5 (Elvington)</p> <p>The increase of flows at the Shooters Hill junction would in my view warrant further modelling to test the capacity of this junction with Local Plan growth.</p> <p>KCC would also recommend that traffic routing from the Elvington and Shepherdsweil allocations via the Sandwich Road/Mill Lane junction is quantified to assess the impact of this route into Sandwich.</p> <p>Cluster 6 (Alkham Valley Road/Hawkinge)</p> <p>Dover Local Plan impacts at the A260/Spitfire Way junction (outside of the Dover District) should warrant proportionate contributions from the sites identified to be adding the most traffic to the Alkham Valley corridor.</p>
<p><b>Infrastructure Delivery Plan including Infrastructure Delivery Schedule IDP (2022)</b></p>	<p><b><u>Highways and Transportation:</u></b> In respect of paragraph 3.20 – KCC maintains the position that the Whitfield mitigation schemes should be delivered by National Highways as the junctions are located on the Strategic Road Network.</p> <p>Reference should also be made to comments provided in respect of Policy SP11 - Infrastructure and Developer Contributions.</p> <p><u>Development Investment:</u> For all Regulation 19 documents, the current rates quoted for developer contributions are correct at the time of publication, but will be subject to a consultation as part of the revised Kent County Council Developer Contributions Guide and will be subject to change as a result of this consultation. These updated rates are anticipated by the end of November 2022. All KCC Education, Communities, Social Care and Waste rates are subject to indexation as of April 2020 at (BCIS index 360.3).</p> <p><u>Introduction – Local Policy Context – Role of KCC - 2.16</u></p> <p>KCC is preparing a revised Kent County Council Developer Contributions Guide which will feed into future iterations of the IDP. We would request that this is a supplementary planning document (SPD) to this Local Plan.</p> <p><u>Theme 2: Waste Management Infrastructure.</u></p> <p>In respect of paragraph 5.1 – Kent operates a network of 19 House Waste Recycling Centres, not 18 – this should be corrected.</p> <p>Waste rates quoted in paragraph 5.6 are currently correct but are under review as part of the KCC Developers Guide.</p> <p><u>Part 2 – Social and Community Infrastructure – Theme 5 – Education – Primary School Provision</u></p> <p>The first sentence of 8.11 should be deleted and amended text inserted as follows:</p> <p><i>The draft Regulation 19 Local Plan increases the number of dwellings by 600 to 6,350. The additional 600 homes would increase the primary school requirement to 6.6FE which is over</i></p>

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	<p><i>three 2 FE primary schools at KCC's standard pupil rate. Three 2FE primary schools were identified in the masterplan. One schools site (2FE) is already secured and the first 1FE of capacity has been delivered. This leaves the second 1FE to be build, together with the need for a further 4.6FE of provision. This could be provided as two 2FE schools and a 1 FE school, or additional land could be safeguarded around one of the 2FE sites to enable it to expand to 3FE if required.</i></p> <p>KCC requests that paragraphs 8.12 and 8.13 are deleted.</p> <p>In respect of paragraph 8.18, the following amended text should be included:</p> <p><i>Sandwich and Eastry Planning Group - The plan would suggest 362 dwellings leading to 79 primary aged pupils. Extant permission of 1,133 dwellings leading to a further 246 pupils (total 325 pupils). This is equivalent to around just under 1.5FE of additional primary school provision. Extension of primary provision will be required.</i></p> <p>KCC requests that paragraphs 8.19, 8.20 and 8.21 are deleted.</p> <p>In respect of paragraph 8.22, the following amended text should be included:</p> <p><i>Ash and Wingham Planning Group - The plan would suggest 382 dwellings (of which 196 are allocated in the Ash Neighbourhood Plan) leading to 83 primary aged pupils. Extant permission of 174 dwellings leading to a further 38 pupils (total 121 pupils). Extension of primary provision may be required.</i></p> <p>KCC requests that paragraph 8.23 is deleted</p> <p>The County Council proposes the following amend to paragraph 8.25:</p> <p><i>If no other housing is to come forward in the Plan period, 1FE of additional primary school provision could be achieved by expansion of one or a number of the three schools:</i></p> <ul style="list-style-type: none"> <li>• <i>Aylesham Primary School</i></li> <li>• <i>St Joseph's RC Primary School</i></li> <li>• <i>Nonington CE Primary School</i></li> </ul> <p>KCC requests that paragraph 8.26 is deleted</p> <p><u><i>Part 2 – Social and Community Infrastructure – Theme 5 – Education –Secondary School Provision</i></u></p> <p>In respect of paragraph 8.27, the following amended text should be included:</p> <p><i>Eythorne and Sheperdswell Planning Group - The Local Plan would suggest 430 dwellings leading to 93 primary aged pupils. Extant permission of 41 dwellings leading to a further 9 pupils (total 102 pupils). This is equivalent to around 0.5FE of additional primary school provision. Extension of primary provision will be required</i></p> <p>KCC requests that paragraph 8.28 is deleted</p> <p>In respect of paragraph 8.31, the following amended text should be included and merged with the detail in paragraph 8.32:</p> <p><i>KCC would look at expanding existing schools, if required. However, the size of existing secondary school sites could limit the amount of expansion that is possible or could increase the costs of an expansion.</i></p> <p>KCC requests that paragraphs 8.35 and 8.36 are deleted</p> <p><u><i>Part 2 – Social and Community Infrastructure – Theme 5 – Education 8.4.</i></u></p>

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	<p>Paragraph 8.4 should be amended with new SEND rates - SEND Contribution Rate (Build Only) is estimated at £45,916.00 per Pupil equating to £505.17 per House and £126.29 per Applicable Flat. Indexed as of April 2020 at (BCIS index 360.3).</p> <p>Amendments should be made to 8.43 to include reference to Whitfield and Dover North planning group as follows:</p> <p><i>For Whitfield and Dover North planning group alone around 6 settings would be required. It would be expected that the two new schools would have a nursery provision and one could be added to on the Whitfield Aspen main site. Additional settings could be added to existing schools, located in community use buildings and commercial premises. DDC will work with KCC to consider how any new community buildings or commercial building could be located and designed in such a way as enable this to happen</i></p> <p><u>Part 2 – Social and Community Infrastructure – Theme 5 – Health and Social Care - 9.2</u></p> <p>KCC contribution rate for social care at 9.2 is incorrect – this should be correct to £146.88 per dwelling.</p> <p><b>Infrastructure Delivery Schedule</b></p> <p>In respect of footnote 9 – this states that all KCC costs are indexed as of April 2020 – these relate to KCC Education, Communities, Social Care and Waste costs are indexed as of April 2020.</p> <p><u>Table 1 - District-wide. Education – Primary.</u></p> <p>The County Council notes that [primary costs are incorrect and these should be amended throughout the Local Plan where they are referenced.</p> <p>Primary education rates:            Extension - £4,642 per house and £1,160.50 per flat            New build - £6,800 per house and £1,700 per flat            Primary land costs:            £1,688.52 per house            £422.13 per flat            Indexed as of April 2020 at (BCIS index 360.3).</p> <p><u>Education - Secondary</u></p> <p>The County Council is satisfied with statement that secondary is looked at across the whole district and the overall need of 11.2FE but would recommend that contributions are directed towards schools in the Dover district, as opposed to referring to specific schools.</p> <p>It is requested that wording on safeguarding land for secondary expansion is included as part of the 'Description/Purpose'. The size of existing secondary school sites could limit the amount of expansion that is possible or could increase the costs of an expansion. Should land adjacent to any existing secondary school become available, KCC requests that District Council consults with the Local Education Authority to determine whether the land should be safeguarded for future education expansion.</p> <p><u>Education – SEND</u></p> <p>County Council SEND rates are currently under review – and this should be clarified within the Estimated Costs column. SEND Contribution Rate (Build Only) is estimated at £45,916.00 per Pupil equating to £505.17 per House and £126.29 per Applicable Flat. Indexed as of April 2020 at (BCIS index 360.3).</p> <p>The build rate per pupil has resulted from a 2019 study commissioned by KCC, in which AECOM assessed the county council's SEND build projects and benchmarked these against national projects. A blended rate is used as the baseline rate, covering provision of a broad range of SEND school places. All rates are subject to indexation and review.</p>



Policy/Paragraph	Commentary
	<p><u>Education – Early Years</u></p> <p>The County Council requests the following amended text in respect of Whitfield Early Years settings.  <i>For Whitfield and Dover North planning group alone, around 6 settings would be required. It would be expected that the two new schools would have a nursery provision and one could possibly be added to the Whitfield Aspen Primary School.</i></p> <p><u>Education – Adult</u></p> <p>Estimated cost column states £ unknown – this should be amended to £16.42 per dwelling in the Estimated Cost column. Indexed as of April 2020 at (BCIS index 360.3).</p> <p><u>Health and Social Care – Wheelchair Accessible Housing</u></p> <p>KCC advises that all homes are built in accordance with Part M4 (2). All Homes built as Wheelchair Accessible &amp; Adaptable Dwellings in accordance with Building Regs Part M 4 (2).</p> <p><u>Health and Social Care – Adult Social Care</u></p> <p>The description wording should be amended to:</p> <p><i>Developer contributions will continue to be sought as appropriate to ensure sufficient provision of adult social care to the residents of new developments, including: assistive technology systems and equipment to adapt homes, adapting community facilities, sensory facilities and Changing Places within the District.</i></p> <p>Also – KCC requests that £146.88 per dwelling is added to the cost column. Indexed as of April 2020 at (BCIS index 360.3).</p> <p><u>Health and Social Care – Specialist Care Accommodation</u></p> <p>KCC requests that £146.88 per dwelling is added to the cost column. Indexed as of April 2020 at (BCIS index 360.3).</p> <p><u>Community Facilities - Youth</u></p> <p>Indexation should be included within the costs column - Indexed as of April 2020 at (BCIS index 360.3).</p> <p><u>Community Facilities - Libraries</u></p> <p>Indexation should be included within the costs column - Indexed as of April 2020 at (BCIS index 360.3).</p> <p><u>Digital infrastructure</u></p> <p>KCC request on broadband provision could be included. KCC requests that before new development commences details shall be submitted for the installation of fixed telecommunication infrastructure and gigabit-capable (minimal internal speed of 1000mbps) connections to multi-point destinations and all buildings including residential, commercial and community. The infrastructure shall be installed in accordance with the approved details during the construction of the development, capable of connection to commercial broadband providers and maintained in accordance with approved details. The development should comply with any statutory or non-statutory guidance extant at the time a decision on the application for planning permission is made.</p> <p>Reason: To provide future-proof digital infrastructure in new developments as required by National Planning Policy Framework (NPPF) paragraph 114.</p>

Policy/Paragraph	Commentary
	<p><b>Site specific</b></p> <p><u>Table 2 Whitfield – Education Primary – Whitfield UE Primary Schools</u></p> <p>The County Council requests that the project is renamed: Whitfield and Dover North Primary Schools Group</p> <p>The County Council requests the inclusion of the following amended description:</p> <p><i>There is a total requirement of 6.6FE. Three 2FE primary schools were identified in the masterplan. One schools site (2FE) is already secured and the first 1FE of capacity has been delivered. This leaves the second 1FE to be build, together with the need for a further 4.6FE of provision. This could be provided as two 2FE schools and one 1 FE school, or additional land could be safeguarded around one of the 2FE sites to enable it to expand to 3FE if required.</i></p> <p>Primary school rates should also be amended as per the district wide section.</p> <p><u>Table 2 Whitfield – Education – Primary Whitfield and Dover North Primary Schools Group</u></p> <p>As a result of the amendments to the row above –please delete this row. Please delete the row on Whitfield and Dover North Primary Schools – leaving one row for all Whitfield primary education (above).</p> <p><u>Table 3 Deal – Education – Primary</u></p> <p>Primary rates should also be amended as per the district wide section.</p> <p><u>Table 3 Deal – Education – Secondary</u></p> <p>It is suggested that the description box should be amended – expansion not ‘extension’.</p> <p>The County Council also recommends the inclusion of the following:</p> <p><i>KCC education has identified a need for school expansion at Sandwich Technology School but the site is already undersized for the current form entry (FE) it provides.</i></p> <p><u>Table 4 – Sandwich – Education – Primary</u></p> <p>The project description should be amended to read the following:</p> <p><i>Extension of primary provision will be required.</i></p> <p>The remaining text in the description box should be deleted.</p> <p>Primary rates should also be amended as per the district wide section.</p>

Policy/Paragraph	Commentary
	<p><u>Table 5 – Aylesham – Education – Primary</u></p> <p>The project description should be amended to read the following:</p> <p><i>Requirement in Aylesham is equivalent to just over 1 FE of additional primary school provision. This could be achieved by expansion of one or a number of the three schools:</i></p> <ul style="list-style-type: none"> <li>• <i>Aylesham Primary School</i></li> <li>• <i>St Joseph’s RC Primary School</i></li> <li>• <i>Nonington CE Primary School</i></li> </ul> <p>The County Council would also draw attention to the typo in the costs column and the correction required to the primary costs – which should read S106 Primary Costs 2022</p> <p>Primary rates should also be amended as per the district wide section.</p> <p><u>Table 5 – Aylesham – Adult Social Care</u></p> <p>This infrastructure category should be Adult Social Care – not just ‘Adult’.</p> <p>Project name and description should be amended alongside the text relating to the ‘Linked Development Sites’.</p> <p>It is recommended that the project name could be amended to <i>Adult Social Care provision</i> and the description: <i>The District Council are liaising with KCC regarding alternative requirements for Adult Social Care. Details TBC.</i></p> <p>In Linked Development box, ‘as part of the Adult Education Contribution’ should be amended to ‘as part of the Adult Social Care’ contribution.’</p> <p><u>Table 6 Local Centres – Education – Primary – Sandwich and Eastry</u></p> <p>The project description should be amended to read the following:</p> <p><i>Extension of primary provision would be required.</i></p> <p>The Primary costs are incorrect. Primary rates should also be amended as per the district wide section.</p> <p><u>Table 6 Local Centres – Education – Primary – Ash and Wingham</u></p> <p>The project description should be amended to read the following:</p> <p><i>Should additional provision be required in Ash and Wingham Planning Group - extension of primary provision would be required.</i></p> <p>The Primary costs are incorrect. Primary rates should also be amended as per the district wide section.</p> <p><u>Table 6 Local Centres – Education – Primary – Eythorne and Shepherdswell</u></p> <p>The project description should be amended to read the following:</p> <p><i>The need in Eythorne and Shepherdswell group is equivalent to around 0.5FE of additional primary school provision. Extension of primary provision would be required.</i></p>

**Dover Local Plan Regulation 19 Consultation.**  
**Kent County Council Response (November 2022)**

Policy/Paragraph	Commentary
	The Primary costs are incorrect. Primary rates should also be amended as per the district wide section.
<b>Archaeological characterisation for Dover (DDC/KCC 2020)</b>	Heritage Conservation: The County Council welcomes the inclusion of this document in the evidence base for the Local Plan. The archaeological characterisation represents the most up-to-date attempt to tell the story of Dover's development over time and assess the significance of this story and the heritage assets that underpin it. It will serve as a very useful tool for developers trying to assess the impact of their proposals and for planners who will draw upon it to inform their decision-making. It will also be of great interest to the community who may wish to learn more about the history of the town and the archaeological remains both beneath their feet and in some cases still visible in front of them. This is a once in a generation document of great importance.