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BY EMAIL ONLY

25 March 2019

Dear Andrew,

Re: Western Heights and Farthingloe, Dover (DO/12/00440)

Thank you for inviting Kent County Council (KCC) to comment on the hybrid planning application received for the comprehensive redevelopment of Western Heights and Farthingloe, Dover comprising (in summary) the following:

- Outline planning permission for the construction of up to 512 new residential units, a 90 apartment retirement village and health facility at Great Farthingloe Farm, and up to 31 new residential units, a hotel, conference centre and pedestrian access network and associated landscaping and works at Western Heights; and
- Full planning permission for the conversion of existing buildings to a pub/restaurant, retail shop and bed and breakfast at Great Farthingloe Farm, nine new residential units and a museum/visitor centre with associated landscaping and ancillary infrastructure and works at Western Heights.

In considering the application as it currently stands, the County Council raises a **holding objection** on the following grounds:

Highways and Transportation: There is a need for further clarification and discussion with the applicant on the transport modelling, with a view to then carrying out revised modelling once relevant parameters are agreed. In addition, further information is required for access arrangements and parking.

Sustainable Urban Drainage Systems: No information has been submitted to confirm existing drainage provision. It does not appear that any preliminary ground investigation has been undertaken to inform a surface water management strategy, nor does any other ground investigation consider infiltration rates. In addition, there is

concern that the delivery of off-site drainage works has not been fully considered for feasibility, or related impacts on project viability.

The County Council would welcome continued discussion with the applicant and Dover District Council (DDC) in an effort to overcome these issues as the application progresses.

KCC has reviewed the submitted documentation and would like to raise the following comments.

Highways and Transportation

Having reviewed the updated Transport Assessment (TA), and in light of the submitted plans and changes to the originally proposed development, the County Council as Local Highway Authority has the following comments to make:

Transport Modelling

The trip rates used for the hotel/conference centre use appear high when compared to similar sites within the TRICS database. Notwithstanding this, multiplying the trip rates by the number of proposed rooms gives much higher two-way trip generation figures in the network peak hours than indicated in Table 5.4 in the TA (69-75 trips as opposed to 3-4 indicated). This would clearly make a difference to the capacity assessments undertaken. It is also noted that trip rates for nursing homes have been used to determine the peak hour trip generation of the proposed retirement apartments, although there does not appear to be a material difference between the two.

There appear to be differences between the 2015 base model figures and the traffic counts undertaken in 2018 at some junctions, potentially impacting on the modelling results produced. This also leads to queries over the accuracy of the base modelling compared to how some junctions are currently operating, based on initial observations.

There also appear to be discrepancies in modelling results between the summary tables in the TA and the corresponding outputs in Appendix K, for the Elms Vale Road/Folkestone Road, Folkestone Road/York Street and York Street/A20 junctions (including for the mitigation proposed). For example, Table 6.10 shows potential capacity issues at the Folkestone Road/York Street roundabout, whereas the corresponding modelling outputs do not. Table 7.4 shows no capacity issues with the proposed mitigation, whereas the corresponding modelling outputs do.

The plan of mitigation - option 2 (mini-roundabout) for the Elms Vale Road/Folkestone Road junction is not included in the TA. The presented preferred mitigation - option 1 (priority junction) reverts back to the layout in place prior to the current mini-roundabout, which it is believed was installed as a traffic calming measure and would therefore preferably be retained.

The figures used for committed development in the assessments do not appear to match those shown in Appendix J for the Dover Western Docks Revival, for both car and HGV

movements. For example, Appendix J shows 108 movements northwards on York Street in the PM peak, but these are not shown in the corresponding flow diagram and assessment.

The additional peak hour trips indicated through the Folkestone Road/York Street roundabout will also spread across the wider highway network to the north and east of this junction. The distribution and assignment model should therefore be expanded to include the routes to and from the Whitfield Roundabout on the A2, including the A256, A258 and A20. It is also noted that there are no AM peak hour trips assigned to the Elms Vale Road/Astor Avenue route, which would be unlikely, bearing in mind that most of the nearest schools to the application site are located along this route.

Access

Visibility splays appropriate for the speed limit in force or 85th percentile measured speeds are required to be shown for the proposed additional Farthingloe access. If measured speeds are available, details of the associated surveys should be provided, including location. The submitted drawing appears to suggest extending the existing 40mph speed limit in Folkestone Road, but this is only possible if the measured speeds are appropriate and further physical measures are put in place to encourage lower speeds. These measures could include narrowing the existing running lanes and widening the existing southern footway to provide an off-road footway/cycleway between the site access and the existing on-road cycle lanes/crossing island to the east of the access. This would also remove the need for cyclists going to/from the site to negotiate the proposed junction.

The TA and Travel Plan (TP) suggest existing bus services could be routed through the application site and KCC is aware that the previous S106 agreement included a contribution towards part provision or revision of bus services. However, there is no information provided on the previous discussions with the bus operator and the KCC Public Transport Team, and KCC is aware that bus services/strategy have been altered since the application was originally submitted. The applicant should therefore discuss possible revisions to bus services with the relevant parties to ascertain what is now feasible and appropriate, bearing in mind that there are currently three buses per hour each way past the site. It should be noted that if bus services are not to be diverted through the site, the applicant will need to consider enhancements to existing pedestrian crossing facilities in Folkestone Road, to enable access to/from bus stops.

The TA and TP suggest that existing bus services could be diverted and improved to provide a half-hourly service along the South Military Road/Centre Road/North Military Road route to serve the Western Heights development. Again, no information has been provided on the previous discussions between the bus operator and KCC's Public Transport Team, and given that the alterations to the bus services/strategy, the applicant should ascertain what is now feasible and appropriate. There is also reference to the possibility of linking the visitor centre to other tourist attractions, such as Dover Castle, although no details have been provided. Again, discussions should be held with relevant parties to ascertain what is feasible and appropriate.

The visibility splays shown for the amended Citadel Road/Gun Store/Drop Redoubt Road junctions should be 43 metres x 2.4 metres x 43 metres, unless measured speeds indicate

otherwise. The same splays but with a 1 metre 'x' distance are also required at all the proposed pedestrian crossing points, and the height of these splays should also be 0.6 metres from the crossing points to the end of the splays. The proposed crossing point in Citadel Road is too remote from the desire line and provides limited visibility, so it should be moved to the junction with South Military Road. A minimum of 43 metres forward visibility is also required to the rear of a stationary bus from a driver approaching the same, at both proposed stops.

Swept path diagrams should be submitted for the largest vehicle likely to use the Gun Store and Drop Redoubt junctions, considering the likely need to accommodate coaches and 11.3 metre refuse/delivery vehicles for the hotel/conference/visitor centre. The Citadel Road junction should also be able to suitably accommodate an 11.3 metre refuse and swept paths should be submitted to demonstrate this.

Independent safety audits and designer responses to all issues raised are required for all the proposed highway alterations.

The TA refers to a plan showing illustrative highway improvements to accommodate coach parking/drop-off and pick-up facilities in South Military Road, to serve a possible future Commonwealth Memorial. The plan does not appear to have been included in the submission, but in any case, the Commonwealth Memorial is not part of the current proposal and the likelihood of it coming forward is unknown, so it is not for consideration at this time.

Parking

The amount and type of parking for the outline elements of the proposal is not being considered or agreed at this time. KCC is satisfied that the proposed 40 parking spaces for the bed and breakfast, pub/restaurant and A1 retail at the Farthingloe site are appropriate and a detailed plan showing the same should be submitted.

In accordance with Local Plan policy DM13, a total of 14 spaces are required for the nine dwellings in Citadel Road, and a detailed plan to illustrate this should be submitted.

The parking accumulation exercise carried out for the visitor centre indicates a demand for 54 spaces, and this figure is not absolute, as it does not appear to include staff arriving before the facility opens. The original proposal (in February 2015) for the visitor centre was a total of 14 spaces; significantly below the demand indicated. Clarification is therefore required on the current proposals for visitor centre parking and detailed plans showing the parking layout should be submitted. Coach parking will also need to be considered.

Travel Plan

The Framework TP is noted and measures such as vouchers for bus travel/cycle purchase and improvements to bus stops are welcomed. However, the plan will be influenced by the modelling, access and parking issues raised above and therefore is likely to be amended, so further comments will be made on the plan once those issues are agreed. It should also be noted that the future maintenance of new bus shelters needs to be given consideration, as they will not be the responsibility of the highway authority.

In conclusion, the County Council, as Local Highway Authority, places a holding objection, until the above matters have been satisfactorily resolved. Clarification from the applicant is required on the transport modelling, with a view to revised modelling being carried out once the relevant parameters are agreed and KCC Highways would therefore welcome discussions with the applicant on this matter. In addition to this, additional information and more detailed plans relating to access and parking are required, as set out above.

Provision and Delivery of County Council Community Services

The County Council has assessed the implications of the proposal in terms of the delivery of its community services, which will require mitigation either through the direct provision of infrastructure or the payment of an appropriate financial contribution. A summary of this impact is provided below (with more detail in Appendices 3-5).

	Per Dwelling (x642*)	Total (642*)	Project
Community Learning	£25.64	£16,460.88	Towards new Adult Education Centre in the Dover Discovery Centre
Youth Service	No current requirement		
Libraries	£78.66	£50,499.72	Towards Dover Discovery Centre library refurbishment and bookstock
Social Care	£58.48	£37,544.16	Towards Social Care Hub in Dover Discovery Centre
	60 Wheelchair Adaptable Homes - as part of the on-site affordable homes delivery		
High Speed fibre optic Broadband	INFORMATIVE: Kent County Council recommends that all developers work with a telecommunication partner or subcontractor in the early stages of planning for any new development to make sure that Next Generation Access Broadband is a fundamental part of the project. Access to superfast broadband should be thought of as an essential utility for all new homes and businesses and given the same importance as water or power in any development design. Please liaise with a telecom provider to decide the appropriate solution for this development and the availability of the nearest connection point to high speed broadband. KCC understands that major telecommunication providers are now offering Next Generation Access Broadband connections free of charge to the developer. For advice on how to proceed with providing access to superfast broadband please contact broadband@kent.gov.uk .		

*The total of 642 dwellings has been calculated using the Schedule of Accommodation dated 20th November 2018 (400 houses, 112 flats and 90 retirement apartments at Great Farthingloe Farm, and 5 houses and 35 flats at Western Heights).

Please note that these figures are to be index linked by the BCIS General Building Cost Index from Oct 2016 to the date of payment (Oct-16 Index 328.3). The figures are valid for three months from the date of this letter; after which they may need to be recalculated, due to changes in district council housing trajectories, on-going planning applications, changes in capacities and forecast rolls, projects and build costs.

Education

The section 106 agreed in April 2015 secured £1,110,034 towards additional places at White Cliffs Primary School, Dover. KCC forward funded the expansion of the school, with the expectation that the agreed developer contributions would be received in due course.

Forward funding the expansion ensured that there were sufficient school places for the development at Western Heights and Farthingloe.

The addition of primary school places at White Cliffs Primary School is still the strategic solution for primary places generated from the Western Heights and Farthingloe development, and therefore KCC would expect that a new S106 agreement would secure developer contributions towards the agreed expansion of White Cliffs Primary School.

	Per 'Applicable' House (x391*)	Per 'Applicable' Flat (x75*)	Total	Project
Primary Education	£3,324.00	£831.00	£1,362,009**	The proportionate share towards White Cliffs PS expansion
Secondary Education	£4,115.00	£1,029.00	£1,686,140	Towards Phase 1 Dover Grammar School for Girls

*'Applicable' units exclude the 90 sheltered retirement apartments and all one-bedroom units less than 26sqm. It has been assumed that all one-bedroom units are less than 26sqm – please advise the County Council if this is not the case. *(The table is based on 391 'applicable' houses and 75 'applicable' flats as outlined in the Schedule of Accommodation which provides the breakdown for bedroom numbers.)*

**Total cost reflects updated construction costs.

Sustainable Urban Drainage Systems

The planning application is supported by a Flood Risk Assessment (FRA) and Drainage Strategy prepared by WSP (December 2018). The FRA notes that there is no surface water infrastructure on site or within its vicinity. Although the document notes that it is anticipated that the surface water from the application site drains by infiltration or via private surface water drainage networks, no information has been submitted to confirm the existing drainage provision. It is proposed that surface water runoff from each development will be attenuated and discharged at a reduced rate to a new public surface water sewer to the existing Southern Water surface water sewer location to the south and the east.

KCC Sustainable Urban Drainage provided a pre-application consultation response in relation to this site on 23 April 2018, in which it was advised that objection would be raised to any planning application which is not supported by preliminary ground investigations. It was outlined that preliminary ground investigations should include the ground and groundwater conditions throughout the proposed development site and the infiltration rates achieved from on-site testing, and that this information should then be used to inform the surface water management strategy.

It does not appear that any preliminary ground investigation has been undertaken to inform the surface water management strategy, nor does any other ground investigation appear to consider infiltration rates.

Building regulations and the Non-Statutory Technical Standards prioritise discharge destinations and as part of this, clearly prioritise the use of infiltration above others. In this instance, the County Council has an additional concern that the delivery of the off-site

drainage works may not have been fully considered for feasibility or the related impacts on project viability.

The County Council therefore recommends that a holding objection is in place until further information is provided to respond to these concerns.

Heritage Conservation

The proposed development at the Western Heights is located within a scheduled monument, and the development located at Farthingloe is within an Area of Outstanding Natural Beauty; both of which are given very significant weight in the National Planning Policy Framework (NPPF). A large part of the site is also located within a Conservation Area, and the farmhouse at Great Farthingloe is a Grade II Listed Building.

The proposed development will cause harm to the significance of the site's designated heritage assets and this is acknowledged in the updated Environmental Statement. Paragraphs 190 and 194 of the NPPF set out a staged approach to decision taking and explain that in the first instance, steps should be taken to avoid or minimise harmful effects on designated heritage assets, and that any remaining harm should require clear and convincing justification. Paragraph 196 of the NPPF then explains how any remaining harm to designated heritage assets should be weighed against the public benefits of the proposal.

Given the changes that have occurred since the application was first submitted, it would be appropriate to consider whether some of the elements of the scheme that are identified as being harmful could now be delivered elsewhere, whilst delivering similar public benefits, including benefits to the historic environment.

The heritage benefits to be delivered by the scheme include the provision of a new museum/visitor centre within the Drop Redoubt. Although part of the full application, there is very little detail within the submission as to what the completed museum/visitor centre will look like, how many visitors it expects to attract, or how it will function. This makes it challenging to quantify the level of public benefit that these improvements will bring.

Additionally, it is noted that it is not the applicant's intention to deliver the proposed heritage benefits themselves, but instead to provide a Heritage Contribution to the sum of £5 million, which would be used by a trust or other such body to deliver this element of the scheme. It is unclear precisely what benefits could be delivered within the £5 million sum or if the benefits proposed rely on securing additional funding from other sources.

As well as the great weight given in the NPPF to the conservation of designated heritage assets, paragraph 172 of the NPPF similarly applies a great weight to the conservation and enhancement of landscape and scenic beauty in AONBs. In heritage terms, the County Council notes that the Farthingloe site forms part of the setting of the Western Heights; the landscape outlook that the AONB provides helps to reinforce the setting of the historic fortifications on the western edge of the town; overlooking and commanding the road from Folkestone. The open countryside of the AONB also forms part of the setting of the listed Great Farthingloe Farmhouse. This is because there is a clear and appreciable historic link

between the farm and the open/agricultural countryside of the Farthingloe Valley. The NPPF notes the importance of the conservation and enhancement of cultural heritage when considering proposals for change in an AONB.

In respect of the AONB, the NPPF notes that major development such as this, should not be permitted other than in *exceptional circumstances* and where it can be demonstrated that the development is in the public interest. Dover District Council will need to determine whether the combination of housing need, economic benefit, and advancement of the Dover regeneration agenda, including proposed enhancement and conservation works at the Western Heights, are sufficiently exceptional to justify the acknowledged harm to designated heritage assets and the AONB.

If the heritage benefits are to be given significant weight in Dover District Council's considerations, then these benefits must be meaningful, deliverable and be based on a thorough understanding of costs. If they are to be considered as an exceptional circumstance, then the heritage benefits must provide a *substantial transformation* at the Western Heights, and such transformation cannot be reliant on securing match funding from other sources, as this may not be forthcoming.

As well as designated heritage assets, the site at Farthingloe is also likely to contain undesignated buried archaeological remains. In previous advice provided to the District Council, the County Council has suggested the need for planning conditions relating to buried archaeology, the recording of historic buildings and structures and for measures to make this information publicly accessible in accordance with the aims of paragraph 199 of the NPPF. The County Council has also advised that a developer contribution be sought towards the long-term storage cost of the archaeological archive that would be generated. The County Council would suggest that such provision should again be included as part of any planning consent that may be granted.

KCC Heritage Conservation will be providing full, detailed advice directly to Dover District Council on this application in its role as Archaeological Advisor.

Public Rights of Way (PRoW)

Public footpaths EB3 and EB10 would be directly affected by the proposed development, and the locations of these paths are indicated on the attached extract of the Network Map (Appendix 1). It should be noted that the Network Map is a working copy of the Definitive Map and the existence of the Public Right of Way (PRoW) is a material consideration.

Pedestrian and Cycle Access

Although the application states that both developments are located in areas which do not currently have a particularly high demand for pedestrian or cycle movement, once the developments have been built, there will be a need to ensure that sustainable transport options are available to and from the sites. Such links will encourage sustainable travel patterns and further increase opportunities available for recreation, active travel and physical activity.

The County Council is pleased to see that access within and adjacent to the sites has been considered to enhance the recreational amenity of the land. The County Council supports the proposal that, in line with the Green Infrastructure Strategy, seeks to improve connectivity and recreational amenities, providing both east-west and north-south connections.

The County Council notes the proposed pedestrian access into Farthingloe from Folkestone Road to the north east corner, along with proposed safe crossing points. The aim of this route is to create a convenient and attractive link, minimising the length over which pedestrians must walk along Folkestone Road, especially where the speed limit is greater than 40mph. The County Council requests that cycle access is also considered and that the route is created in line with Kent Design guidance, where provision for walkers and cyclists should be within traffic free, wide green corridors of open space and should be overlooked by adjoining property to help facilitate a safer environment for path users.

The application identifies a lack of pedestrian access, with missing footways along Centre Road / North Military Road between Western Heights and the town centre. It also identifies leisure pedestrian links from Western Heights and Farthingloe which are not necessarily suitable as 'all season' and 'all time' trails. The County Council requests that in addition to the footway improvements made to Centre Road / North Military Road, improvements to the PRow network referred to as 'leisure pedestrian' links are also made. Such improvements will create an 'all season' route and will be in line with the applicant's Design and Access Statement for existing PRow and the existing National Trails to be retained and enhanced.

Improvements to the PRow network will help mitigate the increased pressure and potential visual impact the development will have on the surrounding area, which includes the Kent Downs AONB, and will make the area more accessible. These improvements may be secured through Section 106 funding and the County Council is happy to provide improvement costs for these routes.

The County Council requests that the applicant supplies further details of any proposed improvements to the surrounding PRow Network, North Downs Way (NDW) and the England Coast Path (ECP). The applicant should also be aware that any proposed work on the surface of a PRow must be authorised by the KCC PRow and Access Service.

Fragmentation of the Network

Heavily trafficked roads may significantly contribute to PRow fragmentation. The impact on the NDW crossing the junction of Citadel Road and South Military Road, along with the ECP crossing North Military Road, will need to be addressed. The potential hotel site will also impact on the current alignment of the ECP, as the proposed road layout would indicate.

The applicant is advised to contact Natural England to seek a variation report to divert the alignment of both the NDW and the ECP. Also, any PRow diversions or creations should be considered at an early stage. Where it is probable that consent will be granted, it is sensible to initiate consultation on proposed alterations to the PRow network as soon as possible. It is important that DDC is in a position to make the necessary Orders at the point at which consent is given.

Planning consent does not confer a right to disturb or divert any PRow at any time without the express permission of the Highway Authority. It is recommended that all existing PRow and open space be kept open throughout construction. Any temporary closures will require arrangement by this office and should include alternative route plans.

Conclusion

The application site has the potential to provide excellent opportunities for walking, cycling and equestrian use. Such provision will greatly benefit the sites connectivity, further increasing opportunities available to residents and visitors for recreation, active travel and exercise. The County Council believes that the PRow network has not been given sufficient consideration throughout the developments and request that further details are provided.

The County Council is happy to discuss any of the points raised and would advise that the applicant gets in contact at their earliest convenience, to address the PRow issues and to ensure that the planning process is not unnecessarily delayed.

Biodiversity

The County Council has reviewed the ecology chapter of the updated Environmental Statement and advises that an adequate level of ecological survey work has been carried out to inform conclusions regarding the potential for ecological impacts to arise as a result of the proposed development.

In paragraph 4.4.33, it is stated, in relation to chalk grassland, that *'there may also be small amounts of woodland and tree planting in some areas of grassland.'* The County Council does not consider this to be appropriate or necessary and advises that tree planting on chalk grassland must be avoided.

In paragraph 4.4.60, it is stated that *'noting the layout of the proposed Hotel there is the possibility that its construction could damage the tunnels forming St. Martin's Battery (in which hibernating bats have been recorded)'*, yet paragraph 4.4.64 goes on to state *'there is no proposed development associated with the application that will affect the known hibernation roosts or swarming site within the Application Site'*. The County Council advises that further information is sought on this point as it is also understood from speaking with Heritage colleagues that an exit from the tunnels may be affected by the proposed development.

The application would benefit from clear tables and site plans showing the extents of current habitats, which will be lost as a result of the proposed development, and that created. This should be sought in respect of the habitats identified on the site, but also in relation to the availability of suitable habitat for the protected species present on the site. This will ensure clarity in Dover District Council's understanding of the potential impacts to the ecological receptors and assist in understanding whether the proposed development meets an aim to minimise impacts on and provide net gains for biodiversity, as outlined in part d of paragraph 170 of the NPPF.

In this respect, the County Council would also seek a better understanding of the proposal for the open space areas, particularly in relation to the habitat creation and timescales for delivery aligned to the development programme.

While not clearly stated, it is expected that there will be ongoing ecological assessments to ensure that all ecological mitigation is based on up-to-date information.

Minerals and Waste

As the Minerals and Waste Planning Authority, the County Council is responsible for ensuring that mineral resources and mineral infrastructure are not needlessly sterilised by other forms of development, thus ensuring that a steady and adequate supply of minerals is maintained into the future to facilitate sustainable development. This safeguarding approach is supported by national planning policy guidance in the NPPF and locally in the adopted Kent Minerals and Waste Local Plan 2013-30 (KMWLP). The NPPF requires that development proposals should not be permitted within mineral safeguarding areas where they might constrain potential future use of the economic mineral resource. As such, the policies within the KMWLP aim to prevent the sterilisation of Kent's potentially economic mineral assets.

There are no safeguarded economic minerals that could be sterilised within the application area. Moreover, there are no minerals or waste management and transportation infrastructure within the application area or within 250m of any of the residential development proposed by the application.

Broadband

The County Council notes the existing provision of broadband in the locality is poor. In relation to the development at Farthingloe, Full Fibre to the Premise (FTTP) is required and it is recommended that the following wording is included as an informative or condition;

Kent County Council recommends that all developers work with a telecommunication partner or subcontractor in the early stages of planning for any new development to make sure that Next Generation Access Broadband is a fundamental part of the project. Access to superfast broadband should be thought of as an essential utility for all new homes and businesses and given the same importance as water or power in any development design. Please liaise with a telecom provider to decide the appropriate solution for this development and the availability of the nearest connection point to high speed broadband. KCC understands that major telecommunication providers are now offering Next Generation Access Broadband connections free of charge to the developer. For advice on how to proceed with providing access to superfast broadband please contact broadband@kent.gov.uk.

In relation to the development at Western Heights, broadband speeds are limited due to the Fibre to the Cabinet (FTTC) technology that supplies the area being located a long distance away from the site. The County Council requests that FTTP is sought for this site, and if possible, an improved system to assist neighbouring properties at Heights Terrace. Whilst it

is noted that there is fibre in the area, specifically feeding the Immigration Centre, this may not be capable of being used.

The adequate provision of broadband is required within both parts of development and it is requested that the applicant liaises directly with the County Council's broadband team to try and secure the best provision for the area and the immediate neighbouring properties.

The County Council will continue to work closely with the District Council to help to ensure the delivery of new housing and infrastructure in response to local needs. In addition, the County Council welcomes any further engagement with the District Council and the applicant as this planning application progresses.

If you require any further information or clarification on any matter, please do not hesitate to contact me.

Yours sincerely,



Barbara Cooper

Corporate Director – Growth, Environment and Transport

Encs:

Appendix 1: Public Rights of Way Network Map 1

Appendix 2: Public Rights of Way Network Map 2

Appendix 3: KCC Developer Contribution Education Assessment

Appendix 4: KCC Developer Contributions Communities Assessment

Appendix 5: KCC Developer Contributions Social Care Assessment