

**Statement of Common Ground**  
**Dover District Council and Kent County Council**

**1. Overview**

1.1 This Statement of Common Ground (SoCG) reflects the jointly agreed position between the parties, Dover District Council (DDC) and Kent County Council (KCC), in relation to the Dover District Local Plan (DDLP) and its evidence base, as of September 2023.

1.2 The purpose of this SoCG is to demonstrate how DDC and KCC have been working together to identify and address outstanding matters. It sets out the areas of agreement on matters raised by KCC in response to the DDLP (Regulation 19 Submission).

1.3 The NPPF sets an expectation that Local Plans should be prepared with the active involvement of statutory consultees and to this end, DDC has been co-operating with KCC throughout the preparation of the DDLP since work started in 2017. This co-operation has been in the form of regular meetings and email correspondence and the sharing of draft documentation. KCC formally responded to the Regulation 18 draft DDLP consultation which took place between January to March 2021, and to the Regulation 19 Submission DDLP. A summary of activity is set out in the Duty-to-Cooperate Statement (GEB01).

1.4 This Statement of Common Ground, without prejudice, relates to the representations made by KCC to the Regulation 19 DDLP and further submission of comments received following the close of the consultation. It addresses unresolved issues, specifically to resolve differences and arrive at an agreed position.

**2. Representations made by Kent County Council**

2.1 KCC made formal representation on the Regulation 19 Submission Dover District Local Plan which took place between 21 October and 9 December 2022.

2.2 Meetings and email exchanges have taken place between DDC and several teams within KCC to discuss and agree the Additional Modifications (AM) to the Plan subsequently. If the Inspectors are supportive of the view of KCC on these matters, the Council would accept additional modifications and as such proposed modifications to text has been agreed for a number of policies, without prejudice, by both parties for this purpose.

2.3 For the avoidance of doubt none of the proposed additional modifications are considered necessary to address soundness issues, however, provide further clarity and detail to the policies.

**3. Current agreed position**

Highways and Transportation

**3.1** In relation to several representations made during the regulation 19 consultation in relation to Highways and Transportation which were addressed prior to submission, these are already set out within [GEB06 Statement of Common Ground with National Highways and KCC Update March 2023 \(doverdistrictlocalplan.co.uk\)](https://www.doverdistrictlocalplan.co.uk/GEB06-Statement-of-Common-Ground-with-National-Highways-and-KCC-Update-March-2023). Any further updates on highway matters will be included within an update to that Statement of common Ground.

### Education

3.2 KCC and DDC have worked very closely to understand how proposed housing developments within the draft local plan will impact upon existing education provision in the district and to recognise where new facilities will be required to accommodate pupils generated from these new dwellings. The details of this are contained within the Infrastructure Delivery Plan and Infrastructure Delivery Schedule (ED7 and ED7a).

3.3 Specifically in relation to the requirements of the delivery of new schools, there are requirements within SAP1 – Whitfield Urban Expansion for additional 2/3FE primary provision in addition to sites already secured through Phase 1, and extensions to other sites across the district have been identified. In relation to secondary provision needs, there is an identified district need for school expansion in the longer term. KCC have identified a need for expansion of Sandwich Technology School specifically which is currently undersized. Policy SAP21 – Land adjacent to Sandwich Technology School safeguards land required to enable this expansion to take place. The remaining requirements for all education needs are outlined within the IDP and agreed by both parties.

3.4 Due to the work already carried out between the two councils in provision planning for school places required to meet the needs of local plan growth, as individual planning applications concerning Local Plan Policy sites are received the position on education requirements are clear as they are detailed within the Infrastructure Delivery Plan and indicative costs are set out within the 2023 KCC Developer Contributions Guide.

### Other KCC Functions

3.5 KCC and DDC have also continued to liaise on all other relevant infrastructure planned and provided by KCC on the production of the Infrastructure Delivery Plan (ED7 and ED7a). It is agreed that no critical infrastructure to meet the needs of Local Plan growth is required, however there are some essential district needs identified such as extensions to waste infrastructure. Site specific requirements have been identified in relation to community facilities within strategic sites of Whitfield Urban Expansion and Aylesham and other requirements in relation to active travel and PRowS which are set out within the site-specific policies and replicated within the IDP.

### Agreed position on all matters

3.6 Table 1 below sets out all other responses received from KCC to the Regulation 19 Local Plan. A summary of all KCC comments made during the Regulation 19 consultation is included as well as the response from DDC and the current agreed position, highlighting any proposed modifications (either Additional Modifications proposed as part of SD06, or further modifications proposed within this statement) which have been agreed by both parties.

**Table 1 – Other KCC Local Plan Representations and agreed position**

Plan section / rep no.	KCC Representation Summary (not full comments)	DDC COMMENTS AND PROPOSED MODIFICATIONS (April 2023)	KCC Response to DDC Modification / Action (August 2023)	Latest Agreed Position / Modification
<b>Introduction</b>				
SDLP908	Whole Representation Summary – placed against Introduction.	SoCG to be progressed	The County Council welcomes engagement to agree a SoCG ahead of the Examination of the Dover Local Plan.	--
SDLP908	<u>Public Rights of Way (PRoW):</u> 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. However, there is still no reference to the County Council’s Rights of Way Improvement Plan (ROWIP)	Support noted  ROWIP is specifically mentioned within paragraph 3.207 (Supporting text of SP11) however <a href="#">Additional modification to Policy TI1 has been proposed which adds further detail: See AM100</a>	PRoW: noted with thanks.	Additional Modification AM100 Agreed by both parties
<b>2.1 Overarching Vision</b> SDLP912	<u>Heritage Conservation:</u> The County Council welcomes Dover’s heritage feature so prominently in the Vision.	Support noted	No comment.	No further action required

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<b>2.2 Strategic Objectives</b> <i>SDLP914</i>	<u>Heritage Conservation:</u> The County Council welcomes the commitment of the District Council to conserving the heritage of Dover	Support noted	No comment.	No further action required
<b>Strategic Policies</b>				
<b>SP1 - Planning for Climate Change</b> <i>SDLP916</i>	<p><u>Kent and Medway Energy and Low Emissions Strategy</u> - the County Council would recommend consideration of this strategy and the <u>County Council's Environment Strategy</u> during the development of the Local Plan.</p> <p><u>Development Investment:</u> The County Council supports the objectives. 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>	<p>Both strategies are already specifically mentioned in Paragraph 3.10, the supporting text above Policy SP1. <b>No modification proposed.</b></p> <p>Noted</p> <p>This matter is covered by policies T11 and T12 and would be addressed during planning application stages taking into account site specific requirements. <b>No modification proposed.</b></p>	<p>Noted</p> <p><u>Development Investment:</u> Content with comment.</p>	No further action required

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<b>SP2 - Planning for Healthy and Inclusive Communities</b> <i>SDLP919</i>	<u>Development Investment:</u> <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.</p>	<u>Additional modification proposed to SP2 criterion 1: (see AM6)</u> <p>Ensuring that new development is well served by services and facilities (for example education, health <u>and social</u> care, 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 life.</p>	<u>Development Investment:</u> <p>Content with modification</p>	<p>Additional Modification AM6 Agreed by both parties</p>
<b>SP3 - Housing Growth</b> <i>SDLP921</i>	<u>Development Investment:</u> <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.</p>	<p>Comment noted, this issue is already covered by Policy SP11 – Infrastructure and Developer Obligations. <b>No modification proposed.</b></p>	<u>Development Investment:</u> <p>Content with comment.</p>	<p>No further action required</p>
<b>SP4 - Residential Windfall Development</b> <i>SDLP922</i>	<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.	<p>Comment noted, this issue is already covered by Policy SP11 – Infrastructure and Developer Obligations. <b>No modification proposed.</b></p>	<u>Development Investment:</u> <p>Content with comment.</p>	<p>No further action required</p>
<b>3.82 Strategic Policy 5 -</b>	<u>Highways and Transportation:</u> <p>The viability of individual sites</p>	<p>The Highways and Transportation comments have been addressed</p>	<p>Noted.</p>	<p>No further action required</p>

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<b>Affordable Housing</b> <i>SDLP923</i>	identified as being liable for significant highway infrastructure provision should be clarified to manage stakeholder expectations at the earliest possible juncture.	through <a href="#">GEB06 Statement of Common Ground with National Highways and KCC Update March 2023</a> ( <a href="http://doverdistrictlocalplan.co.uk">doverdistrictlocalplan.co.uk</a> ). <b>No modification proposed.</b>		
<b>SP7 - Retail and Town Centres</b> <i>SDLP924</i>	<u>Development Investment:</u> Additional households in locations listed will require a proportionate increase in infrastructure provision	Comment noted, this issue is already covered by Policy SP11 – Infrastructure and Developer Obligations. <b>No modification proposed.</b>	<u>Development Investment:</u> Content with comment.	No further action required
<b>SP8 - Dover Town Centre</b> <i>SDLP925</i>	<u>Highways and Transportation:</u> 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.  <u>Heritage Conservation:</u> The County Council welcomes see General Principle 5. <u>Development Investment:</u> Any increase in households in Dover	The Highways and Transportation comments have been addressed through <a href="#">GEB06 Statement of Common Ground with National Highways and KCC Update March 2023</a> ( <a href="http://doverdistrictlocalplan.co.uk">doverdistrictlocalplan.co.uk</a> )  Support noted.  Comment noted, this issue is already covered by Policy SP11 –	Noted.  <u>Heritage Conservation:</u> No further comment.  <u>Development Investment:</u> Content with comment.	No further action required

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	town centre will require a proportionate increase in infrastructure provision, commensurate with the profile of occupants/residents.	Infrastructure and Developer Obligations. <b>No modification proposed.</b>		
<b>SP9 - Deal Town Centre</b>  <i>SDLP926</i>	<u>Heritage Conservation:</u> The County Council welcomes consideration of the role of the historic environment recognised as recognised in paragraph 4.  <u>Development Investment:</u> Any increase in households in Deal town centre will require a proportionate increase in infrastructure provision.	Support noted.  Comment noted, this issue is already covered by Policy SP11 – Infrastructure and Developer Obligations. <b>No modification proposed.</b>	<u>Heritage Conservation:</u> No further comment.  <u>Development Investment:</u> Content with comment.	No further action required
<b>SP10 - Sandwich Town Centre</b>  <i>SDLP927</i>	<u>Heritage Conservation:</u> The County Council welcomes consideration of the role of the historic environment <u>Development Investment:</u> Any increase in households in Sandwich town centre will require a proportionate increase in infrastructure provision.	Support noted.  Comment noted, this issue is already covered by Policy SP11 – Infrastructure and Developer Obligations. <b>No modification proposed.</b>	<u>Heritage Conservation:</u> No further comment.  <u>Development Investment:</u> Content with comment.	No further action required



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<p><b>SP11 - Infrastructure and Developer Contributions</b></p> <p><i>SDLP929</i></p>	<p><u>Highways and Transportation:</u> The Local Plan could be more succinct in its approach to transport infrastructure.</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>The County Council operates a network of 19 Household Waste and Recycling Centres, this should be corrected within paragraph 3.215</p>	<p>The Highways and Transportation comments have been addressed through <a href="#">GEB06 Statement of Common Ground with National Highways and KCC Update March 2023</a> (<a href="http://doverdistrictlocalplan.co.uk">doverdistrictlocalplan.co.uk</a>)</p> <p><a href="#">See Proposed additional modification AM18</a> which updates number of HWRCs to 19</p>	<p>Noted.</p> <p><u>Development Investment:</u> Content with comment and proposed modification.</p>	<p>See GEB0 – No further action required.</p> <p>Both Parties agree Additional Modification AM18</p>
<p><b>SP12 - Strategic Transport Infrastructure</b></p> <p><i>SDLP930</i></p>	<p><u>Highways and Transportation:</u></p> <ul style="list-style-type: none"> <li>The A2 corridor is a key consideration within the proposed growth aspirations, it is important that this is reflected in policy,</li> <li>Modelling forecasts indicate that infrastructure</li> </ul>	<p>The Highways and Transportation comments have been addressed through <a href="#">GEB06 Statement of Common Ground with National Highways and KCC Update March 2023</a> (<a href="http://doverdistrictlocalplan.co.uk">doverdistrictlocalplan.co.uk</a>) which sets out and agrees proposed modifications.</p>	<p>Noted.</p>	<p>See Modifications agreed in GEB06 and SD06 Schedule of Additional Modifications in relation to Active Travel and PRoW which are agreed by both parties.</p>

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	<p>improvements are required on the A256 corridor.</p> <ul style="list-style-type: none"> <li>The policy should also specifically allow for the provision and maintenance of bus shelters under the heading of Bus Infrastructure.</li> </ul> <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.</p>	<p>Noted, however, PRoW and Active Travel is already addressed in policies T11 and SP11, and para 3.205 is clear that developer contributions will be sought towards PRoW and other sustainable travel. <b>No modification proposed.</b></p>	<p><u>PRoW</u>: The County Council also welcome inclusion of the point that the PRoW network can complement road, rail and bus on a strategic level</p>	
<p><b>SP13 - Protecting the District's Hierarchy of Designated Environmental Sites and</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....</i> Some of the allocated sites are close to the border of other districts therefore it might not be</p>	<p>Noted. It is considered that this cross boundary issue cannot be addressed in a Dover specific policy without agreement of neighbouring authorities and would make monitoring/enforcement issues difficult to address. However, as with all planning applications, specific issues such as</p>	<p><u>Biodiversity</u>: The County Council accepts that there is no modification proposed but would welcome conversations between Kent Boroughs and Districts on this matter to consider this matter at a strategic level.</p>	<p>DDC have clarified that the amended text simply refers to the mitigation hierarchy in the NPPF and this has been agreed with NE.</p>

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<p><b>Biodiversity Assets</b></p> <p><i>SDLP936</i></p>	<p>appropriate for the habitat creation and management to be carried in the Dover district. 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>this can be considered as they come forward. <b>No modification proposed.</b></p> <p>This is addressed in implementation section paragraph 3.282. However, also <a href="#">See other changes to SP13 proposed through AM23.</a></p> <p>Agree. <a href="#">See Additional Modification AM22</a> which adds Plan Bee reference to paragraph 3.275.</p>	<p>The County Council requests clarification as to how paragraph 3.282 addresses the point raised within it's response.</p> <p>The County Council requests clarification as to how Additional modification 3.275 addresses the points raised within it's response.</p> <p>The Plan Bee Strategy appears to be included within a list of key priority habitats and species.</p>	<p>It is agreed AM23 does not add a requirement for details to be submitted as part of planning applications and it was not intended to. KCC have agreed no further amendments are needed.</p> <p>DDC and KCC agree that the wording on AM22 in relation to Plan Bee can be made clearer, and propose that the following modification should instead be made to paragraph 3.275 to add: <u>Kent's Plan Bee* should also be taken into consideration.</u></p> <p><small>* BEE (kent.gov.uk)</small></p>

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<p><b>SP14 - Enhancing Green Infrastructure and Biodiversity</b></p> <p><i>SDLP937</i></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. 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>:. Using historic routeways also allows Green Infrastructure (GI) designers to incorporate heritage assets to provide features of interest. 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</p>	<p>References to historic landscapes and footpaths are already addressed by policy NE2 - Landscape Character and the Kent Downs AONB and in other parts of the plan.</p> <p>The link between Green Infrastructure and health is already noted in paragraph 3.286</p> <p>Historic routeways are also referenced in HE2 (para 12.16).</p> <p><b>No modification proposed.</b></p> <p><a href="#">Note Additional Modifications AM32, AM33, AM37, AM44, and AM47 adds reference to the national trail England Coast Path to site specific policies.</a></p>	<p><u>PRoW</u>: The County Council would like to see reference made to National trails specifically. The County Council would also encourage consideration of PRoW in respect of this policy, as well as within NE2.</p> <p><u>Heritage Conservation</u>: No further comment</p>	<p>KCC seek to include specific reference to national trails. DDC do not consider it necessary for this policy to propose a modification, but would raise no objection to its inclusion.</p>

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	to the standard of areas such as the High Weald and the Hoo Peninsula which have more detailed and relevant data.			
<b>3.295 to 3.297 Strategic Policy 15 - Protecting the Districts Historic Environment</b>  <i>SDLP938</i>	<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.	Support noted	<u>Heritage Conservation:</u> No further comment.	No further action required
<b>3.296 Strategic Policy 15 - Protecting the Districts Historic Environment</b>  <i>SDLP939</i>	<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	<a href="#">Additional Modification is proposed to address factual changes – see AM26:</a>  However, this does not change the name to Registered Parks and Gardens but explains their source. The DDC Heritage Officer is checking this information and we will follow up on this shortly.	<u>Heritage Conservation:</u> Noted and further engagement with Dover District Council is welcomed.	Both parties agree to Additional Modification AM26, and a further modification to change the word ‘historic’ to ‘Registered’ to reflect the wording elsewhere in the plan (at Para 12.35 in Policy HE4) It is agreed that there are only 6 Registered Parks

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	for Dover (however – not all appear online).			and Gardens in the district.
<p><b>3.302 Strategic Policy 15 - Protecting the Districts Historic Environment</b></p> <p><i>SDLP940</i></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</p>	<p>Heritage at Risk is covered by Policy HE1. A local register of Heritage at Risk register is a recommendation of the Dover District Heritage Strategy (2013, updated 2020) and is referenced in paragraph 12.6 of this Plan.</p> <p>DDC are currently liaising with Historic England on a potential modification in relation to Heritage at Risk – we will follow up on this point shortly.</p>	<p><u>Heritage Conservation:</u> Noted and further engagement with Dover District Council is welcomed.</p>	<p>Both Parties have agreed <b>Proposed further additional modification</b> to HE1, second sentence:</p> <p>In particular, proposals that bring redundant or under-used buildings and areas, <del>including those on the Heritage at Risk Register</del> <u>at risk through neglect, decay or other threats</u> into appropriate and viable use consistent with their conservation will be encouraged. <u>This includes those on the Heritage at Risk Register held by Historic England, buildings and sites identified during the planning application process and any emerging local list of heritage assets at risk.”</u></p>

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	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.			<i>Note: This is also agreed in the SoCG with Historic England</i>
<b>SP15 - Protecting the District's Historic Environment</b>  SDLP941	<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.	Support noted	<u>Heritage Conservation:</u> No further comment.	No further action required
<b>Site Allocations</b>				
<b>General Comments</b>  SDLP942	<u>Highways and Transportation:</u> 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)	The Highways and Transportation comments have been addressed through <a href="#">GEB06 Statement of Common Ground with National Highways and KCC Update March 2023</a> ( <a href="http://doverdistrictlocalplan.co.uk">doverdistrictlocalplan.co.uk</a> ) which sets out and agrees proposed modifications.	Noted.	See GEB06 in relation to KCC Highways comments.

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<p><b>4.10 Garden village principles</b></p> <p><i>SDLP943</i></p>	<p><u>Heritage Conservation</u>: To ensure that settlements of the ‘garden village’ scale do not appear to be 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</p>	<p>The Garden Village principles have been taken from the <a href="#">TCPA Guide to understanding Garden Villages</a> and therefore amendments to the wording here in relation to heritage are not appropriate.</p> <p>Heritage is addressed by Policy PM1.</p> <p><b>No modification proposed.</b></p>	<p><u>Heritage Conservation</u>: The County Council notes that the TCPA guide says very little about heritage. The only paragraph of relevance is on page 16 where it states (<i>reference removed</i>)</p> <p>If the phrase “Both will reflect the unique materials, designs and landscape of their locality” is interpreted to include reflecting historic layouts of tracks, lanes and boundaries this may be acceptable but it is doubtful whether this is the intention. The County Council would encourage the District Council to go beyond the TCPA principles and consider how garden settlements integrate into the historic landscape</p>	<p>KCC request addition of specific reference to be added relating heritage and design.</p> <p>DDC do not consider it necessary or an appropriate location for reference to heritage as it is not in accordance with the existing TCPA principles that are being highlighted, but would raise no objection to its inclusion.</p>



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	fully integrated into the new design.			
Q1''''''	<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>Para 10.10 in justification above TI2 already mentions PRoW. The wording of TI2 requirements for Transport Statements and Travel Plans is taken from national and KCC guidance, and cross refers to those documents. <b>No modification proposed.</b></p> <p>See AM101 as this does propose some wording changes to TI2 which may relate to this issue.</p>	<p><u>PRoW</u>: The County Council notes AM101 - <i>“the opportunity for more positive transport planning by considering walking, cycling and public transport upfront”</i> but would request that the PRoW network is specifically mentioned.</p>	<p>Additional Modification AM101 agreed in part. KCC request addition of specific reference to be added relating to PRoW DDC do not consider it necessary for this policy, but would raise no objection to its inclusion and further amendment to AM101.</p>
<p><b>4.68 SAP1 Whitfield Urban Expansion</b></p> <p>SDLP965</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>Comments noted. The policy sets out the broad parameters of the requirements of a masterplan/SPD but the wording suggested around specific walking routes to schools is considered too detailed for this stage. KCC will be included / consulted upon as part of the masterplan/SPD production, where topic areas such as this will be incorporated. <b>No modification proposed.</b></p> <p>Additional modification is proposed</p>	<p><u>Development Investment</u>: Content with comment and modification but would welcome an update from DDC on the timing of the Whitfield masterplan/SPD process</p>	<p>Both parties agree Additional Modifications AM29 and AM30. It is agreed that KCC will be consulted on the timing and production of the masterplan/SPD.</p>

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	<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>	<p>to text of policy and supporting text to enable flexibility regarding the update to the SPD. <a href="#">See AM29 and AM30.</a></p>		
<p><b>SAP1 - Whitfield Urban Expansion</b>  <i>SDLP966</i></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.</p>	<p>The Highways and Transportation comments have been addressed through <a href="#">GEB06 Statement of Common Ground with National Highways and KCC Update March 2023</a> (<a href="http://doverdistrictlocalplan.co.uk">doverdistrictlocalplan.co.uk</a>) which sets out and agrees proposed modifications.</p> <p>Additional modification is proposed</p>	<p>Noted.</p>	<p>Both parties have agreed Additional Modifications AM29 and AM30 – Also See GEB06</p>

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	<p>It is essential that a specific policy is included to secure the future route of the Fastrack service. 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>to text of policy and supporting text to enable flexibility regarding the update to the SPD. <a href="#">See AM29 and AM30.</a></p>		
<p><b>SAP2 - White Cliffs Business Park (Phases 2, 3, and 4), Whitfield</b> <i>SDLP979</i></p>	<p><u>PRoW</u>: The County Council would request inclusion of EB10 within this policy.</p>	<p>Policy already says 'PRoW network improvements', so covers all in the area. <b>No modification proposed.</b></p>	<p>No comment</p>	<p>No further action required</p>
<p><b>SAP3 – Dover Waterfront</b></p>	<p><u>Minerals and Waste</u>:</p>	<p>The Council's Minerals Assessment of Reg19 sites addressed this, concluding</p>	<p><u>Minerals and Waste</u>: The County Council would</p>	<p>KCC have confirmed that there is sufficient</p>

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SDLP980	<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.</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.</p> <p><u>PRoW</u>: It is requested that this development does not affect the route of the National Trail.</p>	<p>that minerals extraction in this area would not be likely to be practical and the area of development does not extend to the beach.</p> <p><u>See proposed Additional Modification AM32 in relation to National Trail.</u></p>	<p>welcome engagement with the District Council to seek assurance that mineral importation facilities would not be compromised by the Local Plan in line with Policy DM8 of the Kent Minerals and Waste Local Plan.</p> <p><u>PRoW</u>: Noted.</p>	<p>assurance that the viability of the safeguarded site is not unduly threatened by the redevelopment proposals this issue is resolved with the following further modifications:</p> <p><u>Add to end of paragraph 4.96 A nearby area of the docks contains safeguarded mineral facilities sites. However, the protected sites lie outside of the Dover Waterfront site boundary and within the Dover Harbour Board operational area.</u></p> <p>Both parties agree AM130 – which shows the correct allocation boundary</p>

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				Both parties agree AM32 See: <a href="#">SD06 Schedule of Additional Modifications to the Regulation 19 Submission Plan March 2023</a> ( <a href="http://doverdistrictlocalplan.co.uk">doverdistrictlocalplan.co.uk</a> )
<b>4.104 SAP4 - Dover Western Heights (Citadel)</b> <i>SDLP981</i>	<u>Heritage Conservation:</u> A master plan for the Western Heights was adopted by Dover District Council in 2015. The County Council would urge the District Council to re-engage with the action plan so that it can be taken forward.	Noted.	<u>Heritage Conservation:</u> No further comment.	No further action required
<b>SAP4 - Dover Western Heights Fortifications Scheduled Monument and Conservation Area</b> <i>SDLP981</i>	<u>PRoW:</u> The County Council recommends the policy includes reference to PROW network and sustainable access improvements as outlined in ROWIP <u>Heritage Conservation:</u> The County Council supports this policy in respect of heritage conservation matters.	Agreed. <a href="#">See proposed Additional Modification AM33.</a>	<u>PRoW:</u> Noted, with thanks <u>Heritage Conservation:</u> No comment.	Additional Modification AM33 is agreed by both parties.
<b>SAP8 - Land adjacent to the Gas</b>	<u>PRoW:</u> The County Council requests reference to	Agreed. <a href="#">See proposed Additional Modification AM38.</a>	<u>PRoW:</u> Noted, with thanks	Additional Modification AM38 agreed by both parties.

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<b>Holder, Coombe Valley Road, Dover (DOV022B)</b> <i>SDLP982</i>	improvements to the EBX16 link to the school within this policy.			
<b>SAP9 - Land at Barwick Road Industrial Estate, Coombe Valley, Dover (DOV022E)</b> <i>SDLP983</i>	<u>PRoW:</u> The County Council requests reference to improvements to EB16 Bridleway for connectivity within this policy.	Agreed. <a href="#">See proposed Additional Modification AM40.</a>	<u>PRoW:</u> Noted, with thanks	Additional Modification AM40 agreed by both parties.
<b>SAP11 - Westmount College, Folkestone Road, Dover (DOV026)</b> <i>SDLP984</i>	<u>PRoW:</u> The County Council requests specific reference is made to the improvements to EBX4 within this policy.	Agreed. <a href="#">See proposed Additional Modification AM42.</a>	<u>PRoW:</u> Noted, with thanks	Additional Modification AM42 agreed by both parties.
<b>SAP13 - Dover Small Housing Sites</b> <i>SDLP988</i>	<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	Agreed. <a href="#">See proposed Additional Modification AM44.</a>	<u>PRoW:</u> Noted, with thanks	Additional Modification AM44 agreed by both parties.

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	allow for the investigation and upgrading of Public Footpaths EB7, EB6 & EB17 to Bridleway to link to EB16.			
<b>SAP16 - Deal Small Housing Sites</b> <i>SDLP989</i>	<u>PRoW:</u> The County Council recommends that policy specifically references improvements to Public Footpath ED49.	Agreed. <a href="#">See proposed Additional Modification AM46.</a>	<u>PRoW:</u> Noted, with thanks	Additional Modification AM46 agreed by both parties.
<b>SAP 17 / SAP 18 / SAP 19 / SAP 20 / SAP 21</b>  <b>Sandwich Site allocations</b>  <i>SDLP990</i>	<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.  <u>PRoW:</u> The issue of PROW ES3 link to / Sandwich bridge due to river erosion should be acknowledged by the District	Noted.  The erosion issue is noted. Site SAP17 appears to be directly related and therefore a policy amendment is proposed.  <a href="#">See proposed Additional Modification AM47.</a> In relation to SAP17.  With regards to other sites in the settlement, there does not appear to be a direct impact and therefore specific policy requirements at this time	<u>Development Investment:</u> Content with comment.  <u>PRoW:</u> AM47 should specifically reference the erosion as an issue to be addressed in order to maintain coastal access and direct link.	Additional Modification AM47 agreed in part. KCC request addition of specific reference to be added relating to bridge erosion on ED3. DDC do not consider it necessary for this policy, but would raise no objection to its inclusion and further amendment to AM47.

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	Council as there is danger that access to coast, England Coast Path, and a direct link out of Sandwich will be lost.	may not meet the tests for developer obligations. Once a specific project is identified to rectify the issue, DDC will be able to reference this in the IDP.		
<b>SAP24 - Land to the South of Aylesham (AYL003)</b> <i>SDLP991</i>	<u>PRoW:</u> The County Council welcomes the inclusion of reference to the PROW network	<u>Noted</u>	Noted.	No further action required
<b>SAP25 - Aylesham Development Area</b> <i>SDLP992</i>	<u>PRoW:</u> The County Council requests specific mention of connection to the PROW network within this policy.	Agreed. <a href="#">See proposed Additional Modification AM54.</a>	<u>PRoW:</u> Noted, with thanks.	Additional Modification AM54 agreed by both parties.
<b>SAP26 – Former Snowdown Colliery, Aylesham</b> <i>SDLP993</i>	<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.	Agreed. <a href="#">See proposed Additional Modification AM55.</a>	<u>PRoW:</u> Noted, with thanks.	Additional Modification AM55 agreed by both parties.
<b>SAP28 - Land between Eythorne and Elvington</b> <i>SDLP994</i>	<u>PRoW:</u> The County Council requests specific mention of connection to the PROW network including upgrades for walkers and cyclists within this policy.	Improvements to the Public Right of Way network to increase connectivity in the area, is already a criterion. <b>No modification proposed.</b>	<u>PRoW:</u> Noted, with thanks	No further action required



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<b>SAP34 - Land at Woodhill Farm, Ringwould Rd Kingsdown</b> <i>SDLP995</i>	<u>PRoW:</u> The County Council requests that the Transport Assessment must include consideration of Bridleways ER21, ER20 and PROW network offsite,	Agreed. <a href="#">See proposed Additional Modification AM61.</a>	<u>PRoW:</u> Noted, with thanks	Additional Modification AM61 agreed by both parties.
<b>SAP36 - Land to the N &amp; E of St Andrews Gardens and adjacent to Mill House, Shepherdsweil</b> <i>SDLP996</i>	<u>PRoW:</u> The County Council requests that the policy includes reference to Footpath ER78 improvements for connection to North Downs Way.	Agreed. <a href="#">See proposed Additional Modification AM62.</a>	<u>PRoW:</u> Noted, with thanks.	Additional Modification AM62 agreed by both parties.
<b>SAP37 - Shepherdsweil Small Housing Sites</b> <i>SDLP997</i>	<u>PRoW:</u> The County Council requests that the policy includes reference to improvements required to Footpath ER81.	Agreed. <a href="#">See proposed Additional Modification AM63.</a>	<u>PRoW:</u> Noted, with thanks.	Additional Modification AM63 agreed by both parties.
<b>SAP39 - Land to the west of Townsend Farm Road St. Margaret's at Cliffe (STM007 &amp; STM008)</b> <i>SDLP998</i>	<u>PRoW:</u> The County Council requests that the policy includes reference to improvements required to Footpath ER21.	The policy already includes a reference to PRoW. <i>Note – PROW ER32 runs along boundary not ER21.</i> <a href="#">See proposed Additional Modification AM66.</a>	<u>PRoW:</u> Noted, with thanks.	Additional Modification AM66 agreed by both parties.

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<b>SAP41 - Footpath Field, Staple Road, Wingham (WIN014)</b> SDLP999	<p><u>PRoW:</u> The County Council requests that the policy includes reference to better pedestrian connectivity.</p>	<p>Agreed. <a href="#">See proposed Additional Modification AM69.</a></p>	<p><u>PRoW:</u> Noted, with thanks.</p>	<p>Additional Modification AM69 agreed by both parties.</p>
<b>SAP44 - Land to the east of Great Cauldham Farm, Capelle-Ferne (CAP006)</b> SDLP1000	<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>Agreed. <a href="#">See proposed Additional Modification AM71.</a></p> <p><i>Note – DDC have also added a modification to SAP45 (CAP013) which is adjoining ER253 – see AM74.</i></p>	<p><u>PRoW:</u> Noted, with thanks.</p>	<p>Additional Modifications AM71 and AM74 agreed by both parties.</p>
<b>SAP46 - Land adjacent Langdon Court Bungalow, East Langdon</b> SDLP1020	<p><u>PRoW:</u> The County Council welcomes the inclusion of ER45/56/57 improvements within this policy.</p>	<p>Noted</p>	<p>Noted.</p>	<p>No further action required</p>
<b>SAP47 – Land adjacent to LyddenCourt Farm, Church Lane, Lydden</b>	<p><u>PRoW:</u> The County Council requests that the policy includes reference to improvements required to ER116 and ER115.</p>	<p>Agreed. <a href="#">See proposed Additional Modification AM77.</a></p>	<p><u>PRoW:</u> Noted, with thanks.</p>	<p>Additional Modification AM77 agreed by both parties.</p>

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(LYD003) SDLP1021				
<b>SAP48 - Apple Tree Farm and NW of Apple Tree Farm, Stourmouth Road, Preston</b> SDLP1022	<u>PRoW:</u> The County Council requests that the policy includes reference to the improvements required to Footpath EE480.	Agreed. <a href="#">See proposed Additional Modification AM79.</a>	<u>PRoW:</u> Noted, with thanks.	Additional Modification AM79 agreed by both parties.
<b>SAP49 - Worth Small Housing Sites</b> SDLP1023	<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.	Agreed. <a href="#">See proposed Additional Modifications AM80 and AM81.</a>	<u>PRoW:</u> The County Council requests specific reference of PRoW to strengthen the modifications (i.e. EE237A etc.)	Additional Modifications AM80 and AM81 agreed in part. KCC request addition of specific footpath reference to be added. DDC do not consider it necessary to add this detail but would raise no objection to its inclusion.
<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	Noted.	<u>Heritage Conservation:</u> No comment.	No further action required

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SDLP1024	play in addressing climate change and refers to Historic England guidance.			
<b>5.43 CC6 - Surface Water Management</b> SDLP1025	<u>Heritage Conservation:</u> The County Council was pleased to see that the text identifies potential impacts on the historic environment from SUDS schemes.	Noted	<u>Heritage Conservation:</u> No comment.	No further action required
<b>CC8 - Tree Planting and Protection</b> SDLP1026	<u>Heritage Conservation:</u> The County Council welcomes consideration of the historic aspect of woodlands recognised in this policy.	Noted	--	No further action required
<b>PM1 - Achieving High Quality Design, Place Making and the provision of Design Codes</b> SDLP1027	<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.	The Highways and Transportation comments have been addressed through <a href="#">GEB06 Statement of Common Ground with National Highways and KCC Update March 2023</a> ( <a href="http://doverdistrictlocalplan.co.uk">doverdistrictlocalplan.co.uk</a> ) which sets out and agrees proposed modifications which also address the PRoW comment made.	<u>Development Investment:</u> The County Council is content with the comment. <u>PRoW:</u> The County Council is content with the amend.	Additional Modification AM88 agreed by both parties (Also see GEB06)

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	<p><u>Development Investment:</u> The County Council supports the objective of promoting quality design in the built environment.</p> <p><u>Heritage Conservation:</u> The County Council was pleased to see the historic environment highlighted in paragraph 1a of this policy.</p>			
<p><b>PM2 - Quality of Residential Accommodation</b></p> <p><i>SDLP1028</i></p>	<p><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.</p>	<p>Support noted.</p>	<p><u>Development Investment:</u> The County Council is content with the comment.</p>	<p>No further action required</p>

#### 4. Conclusions

4.1 It is agreed by both parties that the majority of matters raised by KCC in representations have been addressed through the proposed Additional Modifications (SD06), or further modifications agreed in this statement.

4.2 It is agreed that both parties have worked very closely (and continue to do so) on the Dover District local plan and supporting Infrastructure Delivery Plan.


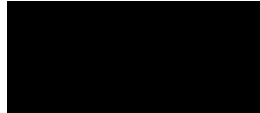
4.3 The outstanding matters raised by KCC which are not agreed by DDC, (as set out in the table above) are summarised as follows:

- i. KCC request specific reference to National Trails to be included within Policy SP14.
- ii. KCC request references to heritage and design within Garden City Principles.
- iii. KCC request specific references to PRoW in several policies and reference to bridge erosion impacting on ES3 in Sandwich.

4.4 Both parties agree that the outstanding matters above are not considered to be related to soundness of the Dover District Local Plan, and can be resolved by additional minor modifications, if considered necessary.

4.5. It should be noted that KCC and DDC also have addressed other Local Plan issues, particularly in relation to Highway matters, in separate Statement of Common Grounds with other parties also as signatories. These should be read in conjunction with this document.

#### 5. Signatories

<p><b>Signed on behalf of Dover District Council</b></p>  <p><b>Sarah Platts</b> <b>Head of Planning and Development</b> <b>11/10/2023</b></p>	<p><b>Signed on behalf of Kent County Council</b></p>  <p><b>Simon Jones</b> <b>Corporate Director, Growth, Environment and Transport</b> <b>13/10/2023</b></p>
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