



Development Control
Gravesham Borough Council
Civic Centre
Windmill St
Gravesend DA12 1AU

FAO: Ethan Bonthron

BY EMAIL ONLY

Strategic Development and Place

Invicta House
County Hall
Maidstone
ME14 1XX

Phone: 03000 413331
Ask for: Kate Beswick
Email:
kate.beswick@kent.gov.uk

Date: 07/04/2025

Your Ref: GR 20250167
Our Ref: K/E/ GR
2025/0167/KB

Dear Ethan

Planning Application: GR 20250167 Provision and Delivery of County Council Community Services:

We refer to the above planning application which concerns proposed residential development at **Milton Place Car Park, Gravesend** and comprising: **76 new households** (applicable for contributions on sites of 0.5ha or more).

The County Council has assessed the implications of this proposal in terms of the delivery of its community services and is of the opinion that it will have an additional impact on the delivery of its services. These impacts will require mitigation, either through the direct provision of infrastructure or the payment of an appropriate financial contribution. A summary of the projects serving the development and proportionate contributions requested is set out in **Table 1**.

The Planning Act 2008 and the Community Infrastructure Levy Regulations 2010 (the CIL Regulations) (Regulation 122) require that requests for development contributions of various kinds must comply with three specific legal tests:

1. Necessary,
2. Related to the development, and
3. Reasonably related in scale and kind

These tests have been duly applied in the context of this planning application and give rise to the following specific requirements (the evidence supporting these requirements is set out in the attached Appendices).

Table 1 – Contribution Request Summary

	Per Applicable House (x 15)	Per applicable flat (x 0)	Total	Project
Secondary Education	£5329.27		£79,939.05	Towards additional capacity in the Gravesham and Longfield Non-selective education planning group
Special Education Needs & Disabilities (SEND)	£559.83		£8,997.45	Towards a SEND school within the KCC North Kent Education Area

‘Applicable’ excludes: 1 bed units of less than 56 sqm GIA, and any sheltered accommodation.

	Per Dwelling (x76)	Total	Project
Community Learning and Skills	£34.21	£2,599.96	Additional equipment and resources for adult education centres serving the development, including outreach provision.
Integrated Children’s Services	£74.05	£1,110.75	Towards additional equipment and resources for the Integrated Children’s Services in Gravesend including outreach provision
Adult Social Care	£180.88	£13,746.88	Towards Specialist care accommodation, assistive technology systems and equipment to adapt homes, adapting

			Community facilities, sensory facilities, and Changing Places within the Borough.
	All Homes built as Wheelchair Accessible & Adaptable Dwellings in accordance with Building Regs Part M 4 (2)		
Waste	£194.13	£14,753.88	Towards Ebbsfleet Waste Transfer Station and HWRC
<i>Highways, PRow, SUDS, Ecology, Heritage Conservation & Minerals.</i>	<i>Please note other KCC Service areas may respond separately</i>		

Please note that these figures:

- are to be **index linked by the All-In Tender Price Index from Q1 2022 to the date of payment.**
- are valid for 3 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.

Justification for Infrastructure Provision/Development Contributions Requested

The Developer Contributions Guide has been approved as County Council policy. Information on the areas KCC will seek for, contribution rates, methodology for calculation and policy justification are contained within the Guide and can be viewed [here](#).

The County Council has modelled the impact of this proposal on the provision of its existing services and the outcomes of this process are set out below and in the attached appendices.

Education

Kent County Council is the Statutory Authority for education and is the Strategic Commissioner of Education Provision.

This proposal has been assessed in accordance with the KCC Developer Contributions Guide methodology of assessment. This assessment will start with the forecast capacity of existing schools, taking in to account existing cohorts, the pre-school aged population, historic migration patterns and new residential developments in the locality.

Contributions are sought based upon the additional need required, where the forecast pupil product from new developments in the locality results in the maximum capacity of local schools being exceeded.

Secondary School Provision

The proposal is projected to give rise to additional secondary school pupils during occupation of the development. This need, cumulatively with other new developments in the vicinity, is assessed in **Appendix 1**. Financial contributions towards expansion will be required to mitigate the impact towards the projects identified in Table 1 and will be provided and delivered in accordance with the Local Planning Authority's Infrastructure Delivery Plan (where available); timetable and phasing.

Special Education Needs and Disabilities Provision

The Children's and Families Act 2014, Equality Act 2010 and Children and Families Act 2014 sets out the county council's responsibilities for children and young people with Special Educational Needs and Disabilities (SEND) aged 0-25 years. KCC's [SEND Strategy \(2021-2024\)](#) sets out its vision and priorities in respect of this area of its service.

Children with more complex needs are supported through an Education, Health and Care Plan (EHP) which sets out the provision they are entitled to. School-age pupils with EHPs are educated in mainstream school classes, in Specialist Resourced Provisions (SRPs) on mainstream sites and in stand-alone special needs schools.

Mitigation of Need

This proposal gives rise to additional pupils with Education and Health Care Plans (EHCPs) requiring extra support through specialist provision. All SEND infrastructure in Kent is currently at capacity.

A proportionate contribution is therefore required to mitigate the impact from the development through the provision of additional SEND places as identified in Table 1.

Provision of Education Places

Please note that the process of education places will be kept under review and may be subject to change (including possible locational change) as the Local Education Authority has to ensure provision of sufficient pupil spaces at an appropriate time and location to meet its statutory obligation under the Education Act 1996 and as the Strategic Commissioner of Education provision in the County under the Education Act 2011.

KCC will commission additional pupil places required to mitigate the forecast impact of new residential development on local education infrastructure generally in accordance with its [Commissioning Plan for Education Provision](#).

Community Learning and Skills

KCC provides Community Learning and Skills (CLS) facilities and services in line with [Framing Kent's Future – Our Council Strategy 2022/2026](#) (Priority 1 – Levelling UP Kent and Priority 2 – Infrastructure For Communities).

Appendix 2 provides detail of; the current shortfall in the provision of this service, the demand generated by the application and proportionate cost requested. Table 1 identifies the mitigating projects serving the development.

Integrated Children's Service – Youth Service/Early Years Service

KCC has a statutory duty to provide Youth Services under section 507B of the Education Act 1996 and the statutory guidance '[Working Together to Safeguard Children](#)'.

Appendix 2 provides detail of; the current shortfall in the provision of this service, the demand generated by the application and proportionate cost requested. Table 1 identifies the mitigating projects serving the development.

Adult Social Care

The proposed development will result in additional demand upon Adult Social Care Services (ASC), including older persons and adults with Learning/Neurodevelopmental/Physical Disabilities and Mental Health Conditions.

Appendix 3 provides detail of the current shortfall in the provision of this service, and also explains the statutory duty upon KCC to provide Adult Social Care services. The appendix demonstrates; the demand generated by the application, the projects serving the development and proportionate cost requested to mitigate the impact arising from this development. Table 1 also identifies the mitigating projects serving the development.

The **Department for Levelling Up, Housing and Communities** identified in June 2019 guidance [Housing for older and disabled people](#), that the need to provide housing for older & disabled people is critical. Accessible and adaptable housing enables people to live more independently and safely.

The inclusion of two accessible M4(3) dwellings is welcomed. Given the previous use of the building KCC requests that all other 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.

Waste Disposal and Recycling

Kent County Council is the statutory 'Waste Disposal Authority' for Kent, responsible for the safe disposal of all household waste. **Appendix 4** provides detail of the current shortfall in the provision of this service, the demand generated by the application and also explains the statutory duty upon KCC.

The appendix demonstrates the projects serving the development and proportionate cost requested to mitigate the impact arising from this development, and accommodate the increased waste throughput within the Borough. Table 1 also identifies the mitigating projects serving the development.

Implementation

The above contributions comply with the provisions of CIL Regulation 122 and are necessary to mitigate the impacts of the proposal. The Local Planning Authority is requested to seek a section 106 obligation with the developer/interested parties prior to the grant of planning permission. The obligation should include provision for the reimbursement of the County Council's legal costs, surveyors' fees and expenses incurred in completing the Agreement. Additionally, a County Council monitoring fee of £300 for each trigger point identified for County contributions within the Agreement is also required, irrespective of whether the County Council is party to the agreement.

Any Section 106 or UU containing contributions for KCC services should be shared with the authority via the Developer.Contributions@kent.gov.uk email address prior to its finalisation.

If you do not consider the contributions requested to be fair, reasonable, compliant with CIL Regulation 122 or supported for payment, it is requested that you notify us immediately and allow at least 10 working days to provide such additional supplementary information as may be necessary to assist your decision-making process in advance of the Committee report being prepared and the application being determined.

We look forward to hearing from you with details of progress on this matter.

Yours sincerely



Kate Beswick
Development Investment Team
Kent County Council

Cc Kate Holland, Invicta Planning

KCC, Education & Communities,

Appendices:

The following Appendices contain the technical details of the County Council's assessment process.

1. Education Assessment
2. Communities Assessment
3. Social Care Requirement
4. Waste Assessment