



Planning & Regeneration Services  
Gravesham Borough Council  
Civic Centre  
Windmill Street  
Gravesend  
Kent  
DA12 1AU

FAO: Peter Price

## Economic Development

Invicta House  
County Hall  
Maidstone  
ME14 1XX

Phone: 03000 417075  
Ask for: Allan Gilbert  
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28 September 2021

Your Ref: GR 20211092  
Our Ref: K/E/GR/20211092 AG

Dear Peter,

### Provision and Delivery of County Council Community Services:

We refer to the above planning application which concerns variation to proposed residential development at **Milton Mount Hall, Old Road East, Gravesend, Kent DA12 1NQ** and comprising: **14 new households**.

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, which will require mitigation either through the direct provision of infrastructure or the payment of an appropriate financial contribution.

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).

## Request Summary

|                     | Per 'Applicable' flat (x14) | Total      | Project                            |
|---------------------|-----------------------------|------------|------------------------------------|
| Secondary Education | £1,135.00                   | £15,890.00 | Towards Mayfield Grammar expansion |

'Applicable' excludes: 1 bed units of less than 56 sqm GIA

|                    | Per Dwelling (x14)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Total     | Project                                                                                                                                                                                |
|--------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Community Learning | £16.42                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | £229.88   | Towards additional resources for Adult Education "Victoria Centre", Darnley Rd, Gravesend DA11 0RX                                                                                     |
| Youth Service      | £65.50                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | £917.00   | Towards additional resources for Miracles Youth Centre, Windsor Road, Gravesend, Kent DA12 5BW                                                                                         |
| Libraries          | £55.45                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | £776.30   | Towards additional services, resources and stock required to mitigate the impact of the new borrowers from this development at Kings Farm Library, Sun Lane, Gravesend, Kent, DA12 5HR |
| Adult Social Care  | £146.88                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | £2,056.32 | Towards Age UK Fleming Resource Centre, Clarence Row, Gravesend DA12 1HJ                                                                                                               |
|                    | All Homes built as <b>Wheelchair Accessible &amp; Adaptable Dwellings</b> in accordance with Building Regs Part M 4 (2)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |           |                                                                                                                                                                                        |
| Waste              | £183.67                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | £2,571.38 | Towards new WTS and capacity works to Pepper Hill HWRC                                                                                                                                 |
| Broadband:         | <p><b>Condition:</b> Before development commences details shall be submitted for the installation of fixed telecommunication infrastructure and High-Speed Fibre Optic (minimal internal speed of 1000mbps) connections to multi point destinations and all buildings including residential, commercial and community. The infrastructure installed in accordance with the approved details during the construction of the development, capable of connection to commercial broadband providers and maintained in accordance with approved details.</p> <p><b>Reason:</b> To provide high quality digital infrastructure in new developments as required by paragraph 114 NPPF.</p> |           |                                                                                                                                                                                        |
| Highways           | Kent Highway Services will respond separately                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |           |                                                                                                                                                                                        |

Please note that these figures:

- are to be **index linked by the BCIS General Building Cost Index from April 2020 to the date of payment** (Apr-20 Index 360.3)
- 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 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 in Appendices 1 - 3 below.

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### Secondary School Provision

The impact of this proposal on the delivery of the County Council's services is assessed in Appendix 1

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

The proposal is projected to give rise to additional secondary school pupils from the date of occupation of this development. This need can only be met through the provision of **new accommodation at the Mayfield Grammar school**.

Please note where a contributing development is to be completed in phases, payment may be triggered through occupation of various stages of the development comprising an initial payment and subsequent payments through to completion of the scheme.

The new secondary school accommodation will be provided through the **expansion of Mayfield Grammar School** and delivered in accordance with the Local Planning Authority's Infrastructure Delivery Plan (where available), timetable and phasing.

Please note this process 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 2021-25 and Children, Young People and Education Vision and Priorities for Improvement 2018-2021.

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### Community Learning

There is an assessed shortfall in provision for this service: the current adult participation in both District Centres and Outreach facilities is in excess of current service capacity, as shown in Appendix 2, along with cost of mitigation.

To accommodate the increased demand on KCC Adult Education service, the County Council requests **£16.42 per dwelling** (x14) towards additional resources for Adult Education "Victoria Centre", Darnley Rd, Gravesend DA11 0RX, local to the development, to accommodate the additional learners.

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## Youth Service

To accommodate the increased demand on KCC services the County Council requests **£65.50 per dwelling** towards additional resources for Miracles Youth Centre, Windsor Road, Gravesend, Kent, DA12 5BW.

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## Libraries

KCC are the statutory library authority. The library authority's statutory duty in the Public Libraries and Museums Act 1964 is to provide 'a comprehensive and efficient service'. The Local Government Act 1972 also requires KCC to take proper care of its libraries and archives.

Bookstock in Gravesend Borough at 735 items per 1,000 population is below the County average of 1,134 and both the England and total UK figures of 1,399 and 1,492 respectively.

To mitigate the impact of this development, the County Council will need to provide additional services, resources, and stock to meet the additional demand which will be generated by the people residing in these Dwellings.

The County Council therefore requests **£55.45 per household** to address the direct impact of this development, and the additional services, resources and stock will be made available in Kings Farm Library, Sun Lane, Gravesend, Kent, DA12 5HR, as and when the monies are received.

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## Adult Social Care

Kent County Council is the Statutory Authority for 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. However, all existing care capacity is fully allocated, with no spare capacity to meet additional demand arising from this and other new developments. In addition, the Social Care budgets are fully allocated, with no spare funding available to address additional capital costs for social care clients generated from new developments.

To mitigate the impact of this development, KCC Social Care requires:

- a proportionate monetary contribution of **£146.88 per household** (as set out in Appendix 3) towards the Age UK Fleming resource Centre at Clarence Row, Gravesend DA12 1HJ.
- The **Ministry of Housing, Communities and Local Government** identified in June 2019 guidance *Housing for older and disabled people* the need to provide housing for older & disabled people is critical. **Accessible and adaptable housing** enables people to live more independently and safely. Accessible and adaptable housing provides safe and convenient homes with suitable circulation space and suitable bathroom and kitchens. Kent Social Care request these dwellings are built to **Building Reg Part M4(2) standard** to ensure they remain accessible throughout the lifetime of the occupants to meet any changes in the occupant's requirements.

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## **Waste**

Kent County Council is a statutory 'Waste Disposal Authority', responsible for the safe disposal of all household waste arising in Kent, providing Household Waste Recycling Centres (HWRC) and Waste Transfer Stations (WTS). Each household produces an average of a quarter of a tonne of waste per year to be processed at HWRC's and half a tonne per year to be processed at WTS's. Existing HWRC's and WTS's will be over capacity by 2020 and additional housing has a significant impact on the manageability of waste in Kent.

A contribution of **£183.67 per household** is required towards a new Waste Transfer Station to meet housing growth and works at Pepper Hill HWRC to increase the capacity to mitigate the impact from this development.

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## **Broadband: Fibre to the premise/gigabit capable**

The NPPF (para 114) and The Department for Digital, Culture, Media and Sport requires full fibre connection to new developments being gigabit capable fibre optic to the premise connection for all.

Please include a Planning Condition to provide 'fibre to the premise' (FTTP) broadband connections to all premises of gigabit capacity.

Developers are advised to make early contact with broadband providers, as there can be a lead in time for cable installation and associated infrastructure.

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## **Implementation**

The County Council is of the view that the above contributions comply with the provisions of CIL Regulation 122 and are necessary to mitigate the impacts of the proposal on the provision of those services for which the County Council has a statutory responsibility. Accordingly, it is requested that the Local Planning Authority seek a section 106 obligation with the developer/interested parties prior to the grant of planning permission. The obligation should also include provision for the reimbursement of the County Council's legal costs, surveyors' fees and expenses incurred in completing the Agreement, and County monitoring fee of £500 for each trigger within the Agreement. We would be grateful if you could share at your earliest convenience a draft copy of any section 106 agreement or UU prior to its finalisation.

Would you please confirm when this application will be considered and provide us with a draft copy of the Committee report prior to it being made publicly available. If you do not consider the contributions requested to be fair, reasonable and compliant with CIL Regulation 122, it is requested that you notify us immediately and allow us 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 faithfully,

*Allan Gilbert*

**Allan Gilbert**  
Development Contributions  
Kent County Council

Cc Wakes Stearns Ltd, c/o Prime Folio, 35 Albion Place, Maidstone, Kent ME14 5DZ  
- FAO Gregory Bunce  
KCC, Education & Communities  
File

**Appendices:**

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

1. Education Assessment
2. Community Assessment
3. Social Care requirement