



Development Management
Gravesend Borough Council
Civic Centre
Windmill St
Gravesend DA12 1AU

FAO: Lisa Fisher

BY EMAIL ONLY

Strategic Development and Place

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Maidstone
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Ask for: Amy Robinson
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Monday 2nd March 2026

Your Ref: GR 20260131
Our Ref: K/E/GR20260131 AR

Dear Lisa,

Planning Application: GR20260131

Provision and Delivery of County Council Community Services:

We refer to the above planning application which concerns proposed residential development at **Site of Former Police Station, 133 Windmill Street, Gravesend DA12 1DB** and comprising of **up to 67 Retirement Living Dwellings**.

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

This application proposes retirement living accommodation. Therefore, subject to a legal agreement (or planning condition) restricting occupancy age to the over 55s (or similar) for these dwellings in perpetuity, Kent County Council will not seek Education, SEND or Integrated Children's Services contributions.

Primary Education	Subject to a binding legal restriction (or planning condition) restricting occupancy age to the over 55s (or similar) for these dwellings, education, SEND and Integrated Children's Services contributions will not be applicable.
Secondary Education	
Special Education Needs & Disabilities (SEND)	
Integrated Children's Services	

	Per Dwelling (x67)	Total	Project
Community Learning & Skills	£34.21	£2,292.07	Contributions requested towards additional equipment and resources for Adult Education Centres and outreach provision serving the development.
Libraries, Registrations and Archives Service	£62.63	£4,196.21	Towards additional resources, equipment and book stock (including reconfiguration of space) at local libraries serving the development, including Gravesend Library.
Waste Disposal & Recycling	£194.13	£13,006.71	Towards new or expanded Waste Transfer Station(s) and HWRC(s) capacity within the Borough of Gravesham to serve the needs of the Development, including at Pepperhill
<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.

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.

Library, Registrations and Archives Service

Under the [Public Libraries and Museums Act 1964](#), KCC has a statutory duty to provide 'a comprehensive and efficient service'. The Local Government Act 1972 also requires KCC to take proper care of its libraries and archives.

There is an assessed shortfall in provision for this service. Borrower numbers are in excess of capacity, and book stock in Gravesham at **915** items per 1,000 population is below the National standard of 1,532.

An evaluation of the impact of this development is shown in **Appendix 1**. The appendix demonstrates; 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 2 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 3** 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

Any subsequent s106 agreement pursuant to approval of this Outline application will contain a formula to allow for the correct calculation of planning obligations at Reserved Matters stage. 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



Amy Robinson
Development Investment Team
Kent County Council

Cc KCC, Education & Communities
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The following Appendices within the attached Combined assessments document contain the technical details of the County Council's assessment process.

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