



Strategic Development and Place

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

FAO: Alison Webster

BY EMAIL ONLY

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County Hall
Maidstone
ME14 1XX

Phone: 03000 418087
Ask for: Rob Hancock
Email:
rob.hancock@kent.gov.uk

Date: 04/09/2024

Your Ref: 2024/0402
Our Ref: K/E/2024/0402/RH

Dear Alison

Planning Application: 20240402 **Provision and Delivery of County Council Community Services:**

We refer to the above planning application which concerns proposed residential development at **Huggens College, College Road, Northfleet, Gravesend, Kent, DA11 9DL**, and comprising: **96 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 96)	Per applicable flat (x nil)	Total	Project
Primary, Secondary and SEND Education	£Nil	£Nil	£Nil	Subject to a binding legal restriction in perpetuity for occupation by the over 55's only, Education contributions will not be applicable
	Currently no Primary/Secondary requirement			

'Applicable' excludes: 1 bed units of less than 56 sqm GIA, and any sheltered accommodation. Please confirm the number of 1 bed units proposed are below this threshold.

	Per Dwelling (x96)	Total	Project
Community Learning and Skills	£34.21	£3,284.16	Community Learning Project details contribution to be applied towards/ or additional equipment and resources for adult education centres serving the development, including outreach provision.
Integrated Children's Services	£Nil	£Nil	Subject to a binding legal restriction in perpetuity for occupation by the over 55's only, Education contributions will not be applicable
Library, Registrations and Archives Service	£62.63	£6,012.48	Towards additional resources, equipment and book stock (including reconfiguration of space) at local libraries serving the development

			including Gravesend Library.
Adult Social Care	£180.88	£17,364.48	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	£18,636.48	Towards Ebbsfleet WTS 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.

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 Borough 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 2**. 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 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., KCC requests these 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



Rob Hancock
Development Investment Team
Kent County Council

Cc Applicant, The President And Trustees Of Huggens's College c/o Mr
 Jonathan Buckwell, DHA Planning, Eclipse House Eclipse Park
 Sittingbourne Road Maidstone Kent ME14 3EN

KCC, Education & Communities,

Appendices:

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

- 1 Education – not applicable
- 1a Education Assessment – not applicable
- 2. Communities Assessment
- 3. Social Care Requirement
- 4. Waste Assessment