



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

FAO: Mrs Amanda Grout

BY EMAIL ONLY

Economic Development

Invicta House
County Hall
Maidstone
ME14 1XX

Phone: 03000 417087
Ask for: Rob Hancock
Email: rob.hancock@kent.gov.uk

Date: 6 January 2023

Your Ref: GR 2022/1179
Our Ref: K/E/20221179/RH

Dear Mrs Grout

Planning Application: GR 2022/1179 Land at St Columbas Close, Gravesend Provision and Delivery of County Council Community Services:

We refer to the above planning application which concerns proposed residential development at **Land at St Columbas Close, Gravesend** and comprising: **46** 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.

KCC Preliminary Assessment

March 2021

32 proposed new homes (10 x 1 bed flats + 20 applicable flats + 2 applicable houses),
replacing 10 existing homes (2 applicable houses + 8 applicable flats)
= net gain 22 new homes (10 x 1 bed flats + 12 applicable flats)

KCC Current Assessment

January 2023

46 Proposed new homes (15 x 1 bed flats + 25 applicable flats + 6 applicable houses),
replacing 10 existing homes (2 applicable houses + 8 applicable flats)
= net gain of 21 new homes (17 applicable flats and 4 applicable houses)

'Applicable' excludes: 1 bed units of less than 56 sqm GIA, and any sheltered accommodation. Please confirm the 15 x1 bed units proposed are below this threshold?

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

Commented [VTGG1]: To ensure accuracy of calculations, it is suggested that you set this table up in excel and copy and paste in to the word document each time.

	Per Applicable House (x 4 applicable houses)	Per applicable flat (x 17 applicable flats)	Total	Project
Primary Education	£4,642.00 per house	£1,160.50 per flat	£38,386.50	Towards expansion of a school locally within the KCC North Kent Education Area
Secondary Education	£4,540.00 per house	£1,135.00 per flat	£37,863	Towards Thamesview expansion

	Per Dwelling (x 21)	Total	Project
Community Learning	£16.42	£344.82	Towards additional resources for Adult Education "Victoria Centre", Darnley Rd, Gravesend DA11 0RX
Youth Service	£65.50	£1,375.50	Towards additional resources for Northfleet Youth Centre, Hall Road, Northfleet, Gravesend, DA11 8AJ
Library Service	£55.45	£1,164.45	Towards additional services, resources and stock required to mitigate the impact of the new borrowers from this development at Kings Farm and Riverview Libraries, Gravesend, Kent
Social Care	£146.88	£3084.48	Towards Age UK Fleming Resource Centre, Clarence Row,

			Gravesend DA12 1HJ
	All Homes built as Wheelchair Accessible & Adaptable Dwellings in accordance with Building Regs Part M 4 (2)		
Waste	£129.20	£2,713.20	Towards Ebbsfleet WTS
Broadband:	Before development commences details shall be submitted for the installation of fixed telecommunication infrastructure and gigabit-capable (minimal internal speed of 1000mbps) connections to multi-point destinations and all buildings including residential, commercial and community. The infrastructure shall be 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. The development should comply with any statutory or non-statutory guidance extant at the time a decision on the application for planning permission is made. Reason: To provide future-proof digital infrastructure in new developments as required by National Planning Policy Framework (NPPF) paragraph 114.		
<i>Highways</i>	<i>Kent Highway Services will respond separately</i>		

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 below and in the attached appendices.

Education

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

Primary Education

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

The proposal gives rise to additional primary school pupils during occupation of the development. This need, cumulatively with other new developments in the vicinity, can only be met through the Primary School Project.

This proposal has been assessed in accordance with the KCC Development Contributions Guide methodology of *'first come, first served'* assessment; having regard to the indigenous pupils, overlain by the pupil generation impact of this and other new residential developments in the locality.

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 Secondary school Project and will be provided 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 as the Local Education Authority will need to ensure provision of the additional pupil spaces within the appropriate time and at an appropriate location.

Community Learning

KCC provides community learning facilities and services for further education in line with KCC policies as set out in its [Strategic Statement Increasing Opportunities, Improving Outcomes](#) (adopted Spring 2015). Community Learning and Skills (CLS) helps people moving to a new development overcome social isolation and encourages community cohesion, as well as improving skills in a wide range of areas.

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 the cost of mitigation.

To accommodate the increased demand on KCC Community Learning, the County Council requests **£16.42 per dwelling** towards the cost of providing Community learning Project, local to the development.

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Youth Service

KCC has a statutory duty to provide Youth Services under section 507B of the Education Act 1996. This requires KCC, so far as reasonably practicable, to secure sufficient educational leisure-time activities and facilities to improve the well-being of young people aged 13 to 19 and certain persons aged 20 to 24.

To accommodate the increased demand on the Kent Youth Service, the County Council requests **£65.50 per dwelling** towards additional resources for the Youth service locally.

Library Service

KCC is the statutory Library Authority. 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.

To mitigate the impact of this development, the County Council will need to provide additional services, equipment, and stock to meet the additional demand 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, equipment and stock will be made available locally at the named Library, as and when the monies are received.

Adult Social Care

The impact of this proposal on the delivery of the County Council's services is assessed in Appendix 3.

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. Existing care capacity is fully allocated, with no spare capacity to meet additional demand arising from this and other new developments.

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

- a proportionate monetary contribution of **£146.88 per household** (as set out in Appendix 3) towards specialist care accommodation, assistive technology systems and equipment to adapt homes, adapting Community facilities, sensory facilities, and Changing Places locally in the Borough.
- 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, providing safe and convenient homes with suitable circulation space, bathrooms, and kitchens. Kent Adult Social Care 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

Kent County Council is the statutory 'Waste Disposal Authority' for Kent, responsible for the safe disposal of all household waste, 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 are running at capacity and additional housing will create a significant burden on the manageability of waste in Kent.

A contribution of **£129.20 per household** is required towards the extension and/or upgrading of the existing Waste facilities, to mitigate the impact arising from this development, and accommodate the increased waste throughput within the Borough.

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Broadband: Fibre to the premise/gigabit capable

Commented [ODG62]: Amended 14/06/22 as per broadband appendix in dev guide (written by Liz Harrison)

The NPPF (para 114) and The Department for Digital, Culture, Media and Sport requires full fibre connection to new developments being gigabit capable (minimum internal speed of 1000mbps) 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.

KCC recommends that all developers work with a telecommunication partner or subcontractor in the early stages of planning to decide on the appropriate solution and the availability of the nearest connection point to high-speed broadband. Most major telecommunication providers are now offering next-generation access broadband connections free of charge to developers. Further details are available on their websites.

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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 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 Contributions
Kent County Council

Cc Sarah Homes, Gravesham Borough Council,
c/o Mr Will Philps, BPTW, 40 Norman Road Greenwich London SE10 9QX
KCC, Education & Communities,
File

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