



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

FAO Peter Price

BY EMAIL ONLY

## Economic Development

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ME14 1XX

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Ask for: Robert Hancock

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Date: 20 July 2022

Your Ref: Application 20220432

Dear Ethan

**Planning Application: 20220432 133 Windmill Street, Gravesend, DA12 1DB**

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

We refer to the above planning application which concerns proposed residential development at the above site and comprising: 75 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. These impacts 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

|                            | <b>Per Applicable House</b> (x Number of applicable houses) | <b>Per applicable flat</b> (x Number of applicable flats) | <b>Total</b> | <b>Project</b> |
|----------------------------|-------------------------------------------------------------|-----------------------------------------------------------|--------------|----------------|
| <b>Primary Education</b>   | £NIL                                                        | £NIL                                                      | £NIL         | n/a            |
| <b>Primary Land</b>        | £ NIL                                                       | £ NIL                                                     | £ NIL        | n/a            |
| <b>Secondary Education</b> | £NIL                                                        | £NIL                                                      | £ NIL        | n/a            |
|                            | Currently no Primary/Secondary requirement                  |                                                           |              |                |

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

|                           | <b>Per Dwelling (x75)</b>                                                                                                                                                                                                                                                                                                                                                                               | <b>Total</b> | <b>Project</b>                                                                                                                                                                              |
|---------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Community Learning</b> | £16.42                                                                                                                                                                                                                                                                                                                                                                                                  | £,1231.50    | Towards additional equipment, services, and resources to assist with the education and training of the new learners arising from this development locally                                   |
| <b>Youth Service</b>      | £65.50                                                                                                                                                                                                                                                                                                                                                                                                  | £4,912.50    | Equipment and resources for local youth centre and to enable outreach youth support in the vicinity of the development.                                                                     |
| <b>Library Service</b>    | £55.45                                                                                                                                                                                                                                                                                                                                                                                                  | £ 4,158.75   | Bookstock and resources for Gravesend Library                                                                                                                                               |
| <b>Social Care</b>        | £146.88                                                                                                                                                                                                                                                                                                                                                                                                 | £11,016.00   | 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 <b>Wheelchair Accessible &amp; Adaptable Dwellings</b> in accordance with Building Regs Part M 4 (2)                                                                                                                                                                                                                                                                                 |              |                                                                                                                                                                                             |
| <b>Waste</b>              | £183.67                                                                                                                                                                                                                                                                                                                                                                                                 | £13,775.25   | Ebbfleet WTS                                                                                                                                                                                |
| <b>Broadband:</b>         | 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 |              |                                                                                                                                                                                             |

|                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|-----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                 | <p>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.</p> <p>Reason: To provide future-proof digital infrastructure in new developments as required by National Planning Policy Framework (NPPF) paragraph 114.</p> |
| <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.

#### **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 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.

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### 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.

Borrower numbers are in excess of capacity, and bookstock in Gravesend per 1000 population is below the County average of 1134 and both the England and total UK figures of 1399 and 1492, respectively.

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 named Library/mobile attending at location, as and when the monies are received.

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### 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 **£183.67 per household** is required towards the extension and/or upgrading of the existing Waste facilities (Household Waste Recycling Centre) to mitigate the impact arising from this development and accommodate the increased waste throughput within the Borough.

## **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 (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.

## **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  
Economic Development  
Kent County Council

Cc

Mr Ziyad Thomas for Churchill Retirement Living

Agent Name: Mr Ziyad Thomas, Planning Issue Limited, Churchill House, Parkside, Ringwood  
BH24 3SG

KCC, Education & Communities,  
File

Appendices:

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

1. Education n/a
2. Communities Assessment
- 3 Social Care Requirement
- 4 Waste Assessment