



**“St James House,
6-8 Overcliffe,
Gravesend,
DA11 0HJ”**

Planning Statement

MARCH 2025



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6-8 Overcliffe,
Gravesend,
DA11 0HJ"**

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Prepared For:

Tower Group Developments Ltd

Prepared By:

Directive Planning and Developments Ltd

70 Gracechurch Street,
London,
EC3V 0XL

Email: info@directiveplanning.co.uk

Tel: +447885737434

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1.0 INTRODUCTION AND SCOPE OF APPLICATION

Introduction

1.1 This Statement has been prepared by **Directive Planning and Developments Ltd** ("the Agent"), on behalf of **Tower Group Developments Ltd** ("the Applicant"), in support of an application for a **Lawful Development Certificate to Gravesham Borough Council** ("the LPA") for the change of use of **St James House, 6-8 Overcliffe, Gravesend, DA11 0HJ** ("the Site").

1.2 The proposed development is described as follows:

"Determination pursuant to Schedule 2, Part 3 (Class T) of the Town and Country Planning (General Permitted Development) (England) Order 2015 as to whether prior approval is required for the change of use of an office (E-Class) to state-funded school (Class F.1(a))".

1.3 This Statement outlines the application site, its surrounding context and the proposed development. In addition, the Statement also offers an in-depth analysis of the planning framework, focusing on Schedule 2, Part 3, Class T of the amended Town and Country Planning (General Permitted Development) (England) Order 2015 to demonstrate the proposed development's compliance with the relevant permitted development requirements.

Scope of Document

1.4 This Statement is divided into eight main sections, and the relevant sections are set out as follows:

- **Section 2.0** (Application Site and Surrounding Context);
- **Section 3.0** (Planning Policy Site Designation);
- **Section 4.0** (Proposed Development);
- **Section 5.0** (Proposed Change of Use Under Class T);
- **Section 6.0** (Planning Policy Context);
- **Section 7.0** (Planning Assessment); and
- **Section 8.0** (Conclusion).



Supporting Documents

- 1.1 This document should also be read alongside the following submitted documents:

Document Name
Completed Application Form and Certificate A; Acoustic Assessment (produced by MRL Acoustics Ltd); and Asbestos Management Survey (produced by Asbestos 247 Environmental Ltd)

Supporting Drawings

- 1.2 The submitted planning application is also supported by accompanying architectural drawings:

Drawing Name	Drawing Reference
Existing Plans	PL-02-6-8OC-SD100
Existing Elevations	PL-02-6-8OC-SD101
Proposed Plans	PL-02-6-8OC-SD102
Proposed Elevations	PL-02-6-8OC-SD103
Existing and Proposed Site Layout Plans	PL-02-6-8OC-SD104



2.0 APPLICATION SITE AND SURROUNDING CONTEXT

Application Site

- 2.1 St James House, located at 6-8 Overcliffe, Gravesend, DA11 0HJ, is a prominent mixed-use building situated on a busy arterial route into Gravesend's town centre. St James House is a three-storey, with lower ground floor level, E-Class office building located prominently on Overcliffe in Gravesend. The building is set slightly back from the main road, allowing for some off-street parking in the front and to the rear, a feature that supports its commercial functionality.
- 2.2 The building was constructed in 1965 and architecturally reflects the utilitarian design typical of mid-20th century commercial structures, featuring a brick façade with large rectangular windows that allow natural light into the office spaces. The existing layout is practical, and optimised for commercial use, with internal spaces divided into various offices to accommodate multiple businesses. Planning history once dictated that the building in the late 70's was in use as an adult education centre, however since 2008 at the very latest, the building was operating under office usage.
- 2.3 The Site is classified as being in Flood Zone 1, which indicates a very low risk of flooding, with a less than 1 in 1,000 annual probability of flooding from rivers or the sea. There are no Listed Buildings or Structures on the Site, however, the property is located within the Overcliffe Conservation Area.



Figure 1: A Street View image of the Site bounded in red. (Source: Google Maps, 2022)



Surrounding Context

- 2.4 Overcliffe is a key road and area situated within the town of Gravesend in Kent, running parallel to the River Thames. The road itself forms part of a larger network connecting the town centre to various residential and commercial zones. Overcliffe's strategic location makes it an essential route within Gravesend, linking directly to major transport hubs, including Gravesend railway station, which offers fast links to central London.
- 2.5 The area is primarily characterised by a mixture of commercial properties, including office buildings, small businesses, and local amenities, as well as residential dwellings. The surrounding context of the Site is experiencing a surge in redevelopment, with several nearby properties undergoing transformations that include both residential and commercial elements. This aligns with the broader trend in Gravesend toward urban renewal, positioning the Site as part of a growing and evolving neighbourhood that aims to balance heritage with modern development.
- 2.6 Gravesend's close proximity to London, combined with its historic and cultural significance, has positioned it as a desirable location for both businesses and residents. Its transport connections, including high-speed rail links to London St Pancras and proximity to the A2 and M25 motorways, make it a well-connected town that balances the appeal of suburban life with the convenience of city access.

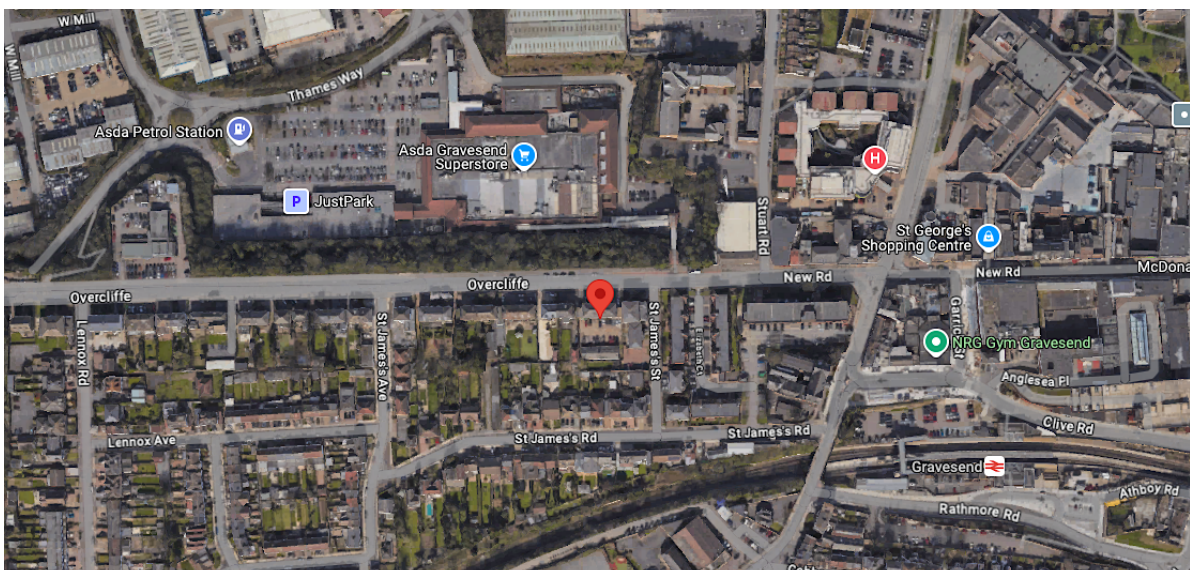


Figure 2: A satellite image of the Site pinned in red and the surrounding context. (Source: Google Maps, 2024)



3.0 PLANNING POLICY SITE DESIGNATION

3.1 It is important to identify whether there are any constraints that have been allocated to the Site which may have an impact on the property being eligible to use permitted development rights. For St James House, the following has been identified:

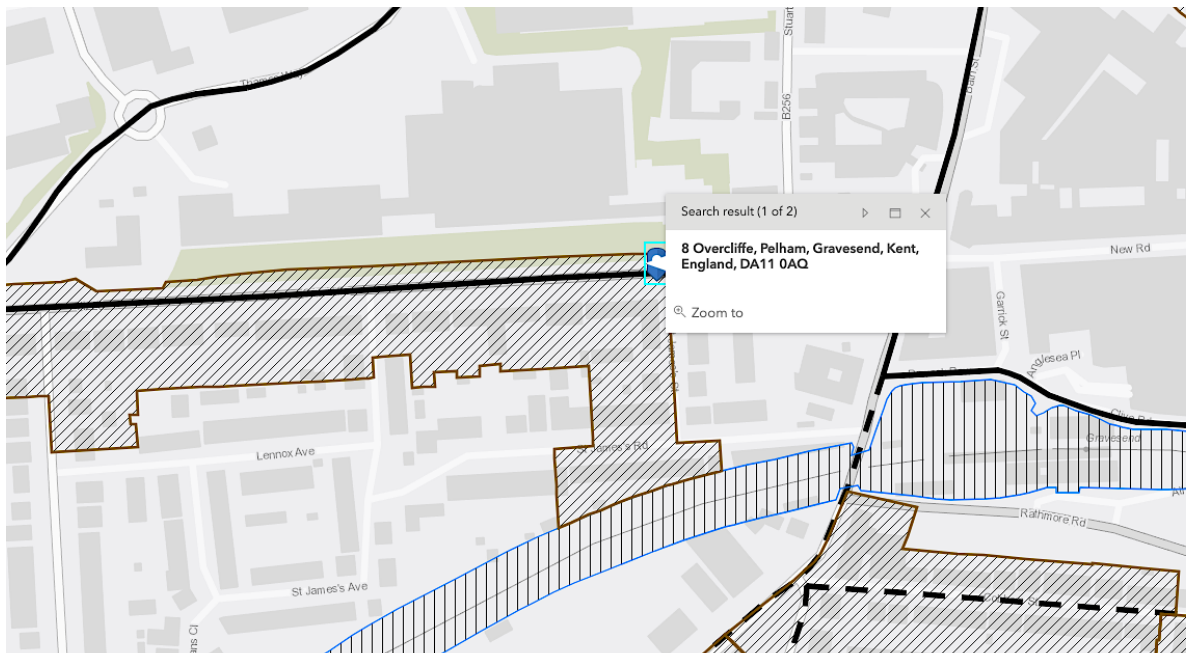


Figure 3: Policies Map with Site pinpointed in blue. (Source: Gravesham District Council, 2014)

3.2 The above Policy Map and its designations have been reviewed in relation to the following planning constraints:

Constraint	Yes/No
Article 4 Direction (HMO)	No
Listed Building	No
Conservation Area (Overcliffe)	Yes
Flood Zone (2 or 3)	No

3.3 After review, the Site has one designation under the Overcliffe Conservation Area. However, as per the requirements of Class T, this designation will not materially affect the proposed development and its ability to use permitted development rights.



4.0 PROPOSED DEVELOPMENT

4.1 The proposed development seeks to convert St James House, from an E-Class (office space) to a state-funded school (F1-Class) under Class T of the General Permitted Development Order (GPDO) 2015. The proposal involves internal alterations to adapt the existing office layout into a functional educational facility, including classrooms, administrative offices, and support spaces, as outlined below:

Internal Reconfiguration (Lower Ground Floor Level)

- The lower ground floor will accommodate a dining room (22.45m²), a finance room (8.2m²), and storage rooms.
- A new hallway will be created to improve access and circulation between the rooms.
- The existing office space will be repurposed into a meeting room and a director's office.

Internal Reconfiguration (Ground Floor Level)

4.2 The ground floor will be adapted to create a reception area, a science laboratory (26.90 sqm), and several classrooms:

- **Classroom 1** – 30.90m²
- **Classroom 2** – 14.90m²
- **Classroom 3** – 19.30m²
- Male and female toilets will be installed alongside a new hall to improve internal circulation.
- A technical room and interview room will also be introduced to support the educational function.

Internal Reconfiguration (First Floor Level)

4.3 The first floor will accommodate additional classrooms and support rooms:



- **Classroom 4** – 20.40m²
- **Classroom 5** – 26.30m²
- **Classroom 6** – 17.90m²
- A conference room (54.58m²) will be created to facilitate school meetings and group activities.
- A head of education team office and other administrative spaces will also be incorporated.

Internal Reconfiguration (Second Floor Level)

4.4 The second floor will provide further support spaces including:

- **Classroom 7** – 14.70m²
- **Classroom 8** – 9.20m²
- A one-to-one room for personalised learning.
- Additional storage and office spaces for staff use.

Purpose and Educational Function

4.5 The proposed development will create a well-organised and functional educational facility suitable for accommodating the specific needs of students with Special Educational Needs (SEN). The internal layout has been designed to ensure a comfortable and supportive learning environment, with dedicated spaces for therapy, one-to-one learning, and group activities. The reconfiguration will also improve the building's accessibility and circulation, ensuring compliance with modern educational standards.

Improved Facilities and Accessibility

4.6 The proposed conversion will significantly enhance the site's usability by providing:

- Modern classrooms equipped with appropriate learning aids and technology.



- Dedicated spaces for staff and students to enhance day-to-day operational efficiency.
- Improved toilet and welfare facilities to meet the needs of staff and students.
- Optimised circulation through new hallways and stairwells to ensure ease of movement within the building.

External Features and Compatibility

4.7 While the proposed development focuses on internal changes, the external appearance of St James House will remain largely unchanged. No major alterations to the building's facade or structural elements are proposed, ensuring that the development remains visually consistent with the surrounding built environment.

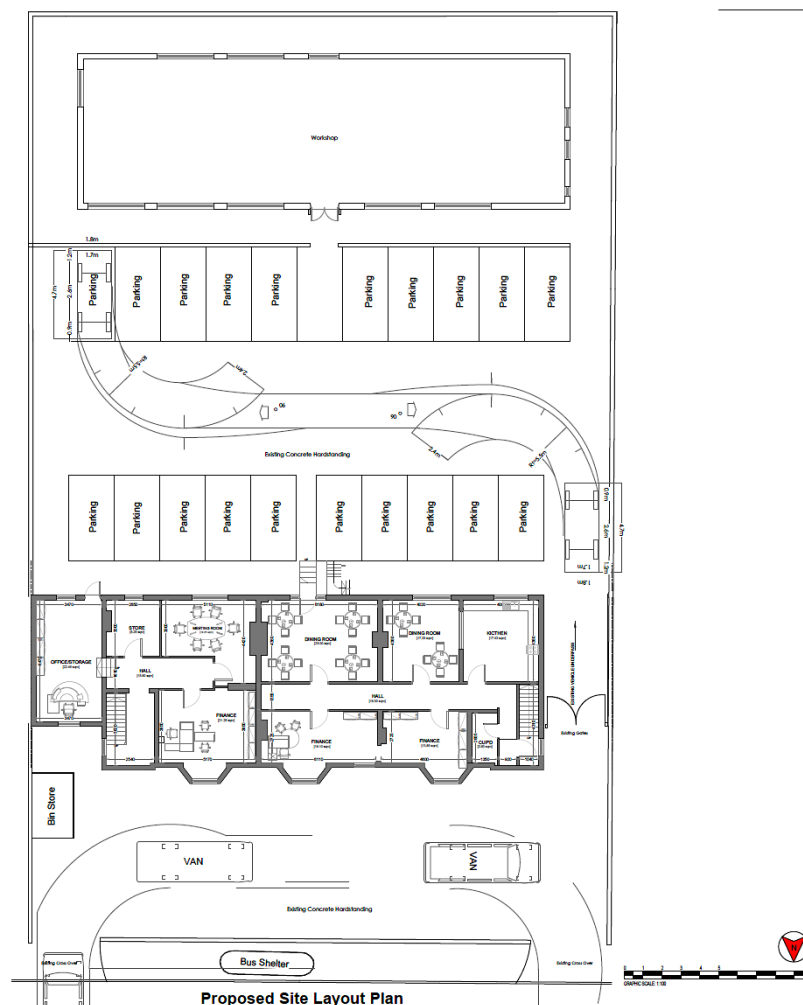


Figure 4: Extract from Proposed Site Layout Plans. (DWG Ref: PL-02-6-8OC-SD104)



5.0 PROPOSED CHANGE OF USE UNDER CLASS T

- 5.1 The applicant has identified, **Pierview Academy**, as the proposed operator for the Site at St James House, 6-8 Overcliffe, Gravesend, DA11 0HJ. Pierview Academy plans to repurpose the building into a full-time specialist educational facility for students with complex learning needs.
- 5.2 Securing approval under Class T would provide flexibility for future operators. This means that, if circumstances change, the premises could lawfully accommodate another state-funded school without requiring a new planning application, thereby ensuring long-term viability for educational use.

Background and History of Pierview Academy

- 5.3 Pierview Academy is a well-established independent Special Educational Needs (SEN) school located in Gravesend. It provides specialist education to students aged 11 to 25 who hold Education Health Care Plans (EHCP). The school was founded to cater to students with complex learning needs who have experienced challenges in mainstream educational settings. Pierview Academy is registered with Ofsted and operates under the management of the ALP (Alternative Learning Provision) Education Group.



Figure 5: *Pierview Academy Logo. (Source: Pierview Academy, 2024)*

- 5.4 The school focuses on small class sizes, tailored learning plans, and individualised support, ensuring that students receive both academic and emotional guidance



suited to their needs. Pierview Academy has built a strong reputation for improving student outcomes through a highly personalised approach to education.

Confirmation of State Funding

- 5.5 Although Pierview Academy is an independent school, it receives state funding through Local Authority placements. Funding is provided for students with EHCPs, ensuring that the school can offer the necessary specialist teaching, therapeutic support, and low student-to-staff ratios. This funding model enables Pierview Academy to provide high-quality education while maintaining financial sustainability.

Reason for Relocation to St James House

- 5.6 The relocation to St James House will allow Pierview Academy to increase its capacity, enhance the learning environment, and provide better support to students with complex learning needs. The building's configuration and strategic location make it well-suited to accommodate the school's long-term operational requirements.
- Central location with excellent public transport links;
 - Off-street parking to accommodate staff and visitor needs; and
 - Flexible internal layout that can be adapted to meet the school's operational and educational requirements with sufficient internal floorspace.



Figure 6: Image showing the current Pierview Academy premises in Gravesham. (Source: Pierview Academy, 2024)



6.0 PLANNING POLICY CONTEXT

6.1 This Statement supports an application for a Lawful Development Certificate for proposed use or development. The assessment will primarily consider compliance with Schedule 2, Part 3, Class T of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended)

6.2 The Town and Country Planning (General Permitted Development) (England) Order (GPDO) (2015) grants planning permission for specific permitted developments. Schedule 2, Part 3 of the GPDO (2015) outlines various development classes, including exceptions, limitations, and conditions. This application pertains to Class T within this framework:

"Class T – commercial, business and service, hotels etc to state-funded schools."

Permitted development

T. Development consisting of a change of use of a building and any land within its curtilage from a use falling within one of the following provisions of the Use Classes Order—

- a) Class C1 (hotels) of Schedule 1;*
- b) Class C2 (residential institutions) of Schedule 1;*
- c) Class C2A (secure residential institutions) of Schedule 1; or*
- d) Class E (commercial, business or service) of Schedule 2;*

To use as a state-funded school falling within Class F.1(a) of Schedule 2 of that Order.

Development not permitted

T.1 Development is not permitted by Class T if—

- a)*
- b) the site is, or forms part of, a military explosives storage area;*
- c) the site is or forms part of, a safety hazard area; or*
- d) the building is a listed building or a scheduled monument.*



Conditions

- A.3 (1) *Development is permitted by Class T subject to the following conditions—*
- a) *the site is to be used as a state-funded school falling within Class F.1(a) of Schedule 2 to the Use Classes Order and for no other purpose, except to the extent that the other purpose is ancillary to the primary use of the site as such a state-funded school;*
 - b) *before beginning the development, the developer must apply to the local planning authority for a determination as to whether the prior approval of the local planning authority will be required as to—*
 - i. *transport and highways impacts of the development;*
 - ii. *noise impacts of the development; and*
 - iii. *contamination risks on the site*
 - (2) *Subject to sub-paragraph (3), development under Class T must begin within a period of 3 years starting with the prior approval date;*
 - (3) *Where, in relation to a particular development under Class T, planning permission is granted on an application in respect of associated operational development before the end of the period referred to in sub-paragraph (2), then development under Class T must begin within the period of 3 years starting with the date that planning permission is granted;*
 - (4) *For the purposes of sub-paragraph (3), "associated operational development" means building or other operations in relation to the same building or land which are reasonably necessary to use the building or land for the use proposed under Class T;*



7.0 PLANNING ASSESSMENT

Permitted Development under Class T

- 7.1 Under Class T, Part 3, Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), the change of use of a building from Use Class E (Commercial, Business and Service Use) to a state-funded school (Use Class F1) is considered permitted development, subject to obtaining prior approval from the Local Planning Authority (LPA).

Class T Requirements

- 7.2 Class T permits the change of use from Class E to a state-funded school provided that the following criteria are satisfied:
- The building was in Use Class E (or its former equivalent) on 1 September 2020.
 - The development is not located within a listed building or a site of special scientific interest.
 - The site is not within Article 2(3) land where certain restrictions apply (e.g., National Parks, AONBs, Conservation Areas, World Heritage Sites, The Broads).

Establishing Lawful Existing Use

- 7.3 Although Class T itself does not explicitly require that the building was in Use Class E on 1 September 2020, the building's existing use must align with Class E as defined by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020. This legislation consolidated former use classes A1 (Shops), A2 (Financial and Professional Services), A3 (Restaurants and Cafés), and B1 (Business) into the new Class E from 1 September 2020.
- 7.4 Therefore, to establish that the proposed change of use qualifies under Class T, it must be demonstrated that the building was lawfully in one of these former use classes on or before this date.



- 7.5 To support the claim that St James House was in lawful use as Class E (Commercial, Business and Service) prior to 1 September 2020 and after. Primary evidence has been obtained from Google Maps Street View imagery dated May 2019.



Figure 7: Street View image denoting the Site's use in May 2019. (Source: Google Maps)

- 7.6 The imagery shows the Site in active commercial use, with signage visible on the building entrance and windows with the lights turned on, furniture intact and adjacent car parking areas in use which is consistent with office or business use.
- 7.7 The previous tenants were the Carley Partnership, a firm of Chartered Accountants that was established in the 1950s. The firm specialised in a range of professional financial services, including accountancy, audit, taxation, and payroll management. The Carley Partnership operated from St James House, 6-8 Overcliffe, Gravesend, for several decades, providing services to both local businesses and private clients. Their business activities fall under Use Class E(c)(iii), which covers the provision of professional services (other than health or medical services).
- 7.8 Further visual evidence denotes that in December 2020, the property was still in use after the 1st September 2020. The firm's long-standing presence at the Site and its clear classification as a professional services provider confirm that the building was in lawful use under Class E prior to the introduction of the revised Use Classes Order in September 2020.



Figure 8: Street View image denoting the Site's use in December 2020. (Source: Google Maps)

- 7.9 The Carley Partnership occupied the Site until 2024. Since the Carley Partnership vacated the premises, the building has remained vacant. For the purposes of this application, the building is considered to retain its E-Class designation as there has been no intervening use or operational change that would affect its established use classification.

Conservation Area Consideration

- 7.10 St James House is located within the Overcliffe Conservation Area. However, Class T remains applicable in Conservation Areas if the change of use does not involve changes to the external appearance of the building that affect the character of the conservation area. As no alterations to the shopfront or external façade are proposed, the change of use would still qualify under Class T.

Prior Approval Conditions

- 7.11 To qualify for permitted development under Class T, the following prior approval conditions must be addressed:
- Transport and Highways Impact
 - Noise Impact on Intended Occupiers



- Contamination Risks on the Site

Transport and Highways Impact

- 7.12 The proposed change of use to a state-funded school is not expected to create any significant transport or highway impacts due to the Site's established infrastructure and sustainable transport links. St James House is located on Overcliffe (A226), a main east-west route through Gravesend, which connects to the A2 and provides direct access to London and the wider strategic road network. Overcliffe experiences consistent traffic movement, particularly during peak hours, but the presence of pedestrian crossings and traffic signals ensures safe vehicular and pedestrian movement.
- 7.13 The Site currently benefits from designated off-street parking at the rear, which will remain unchanged as part of the proposal. This parking provision will accommodate staff, visitors, and operational needs, thereby minimising pressure on surrounding roads. On-street parking along Overcliffe is restricted during the day through double yellow lines, which helps maintain a consistent flow of traffic. The existing parking bays to the rear provide sufficient capacity to meet the operational demands of the proposed school use.
- 7.14 In terms of public transport, the Site benefits from excellent connectivity. Gravesend Railway Station is located approximately 850 metres (around a 10-minute walk) from the site and provides regular services to London St Pancras in as little as 24 minutes via the Southeastern High-Speed Rail network. The station also offers connections to Medway, Canterbury, and the Kent coast, ensuring convenient access for staff and visitors.
- 7.15 Bus services are also highly accessible. Multiple bus routes serve Overcliffe, with stops located a few metres from the site. These routes provide frequent services to nearby towns, including Dartford, Bluewater Shopping Centre, and Ebbsfleet International. The site is further supported by the Fastrack rapid bus service, which links Gravesend town centre with key regional destinations and employment hubs, thereby reducing reliance on private vehicle use.



- 7.16 Walking and cycling infrastructure in the surrounding area is well-developed. Footways are present along both sides of Overcliffe, and the site is within easy walking distance of Gravesend town centre and local amenities. The site's proximity to National Cycle Route 1 and National Cycle Route 177 provides cycling connections to wider destinations across Kent, including Canterbury and Dover. This makes sustainable travel a practical option for staff and visitors.
- 7.17 The proposed change of use will retain the existing transport and parking arrangements without introducing additional strain on local infrastructure. Should there be further transport mitigations required, the applicant is happy to secure these by condition should the application be minded for approval. The established off-street parking provision, combined with excellent access to public transport and cycling facilities, ensures that the development will support sustainable transport patterns and avoid any adverse impact on the local road network.

Noise Impact

- 7.18 An acoustic assessment has been undertaken by MRL Acoustics Ltd to evaluate the noise environment at the Site and assess the suitability of the proposed conversion of St James House into a state-funded school in accordance with the requirements set out in Building Bulletin 93 (BB93): Acoustic Design of Schools. The assessment considers both the potential noise impact on the intended occupiers of the school and the potential noise generated by the school on neighbouring properties.

Noise Impact on Intended Occupiers

- 7.19 The Site is situated on Overcliffe (A226), a busy arterial road, which generates consistent levels of road traffic noise. Measurements taken at the rear of the building indicate that the existing external ambient noise climate is approximately 45 dB LAeq (1-hour). Applying a 15 dB(A) attenuation for an open window, the internal noise levels within classrooms on the rear side of the building are predicted to be approximately 30 dB LAeq — which is comfortably within the BB93 limit of ≤ 30 dB LAeq (30 minutes) for SEN teaching spaces.
- 7.20 The proposed school layout ensures that all SEN classrooms are situated away from the front elevation of the building, thereby reducing exposure to road traffic noise



from Overcliffe. This positioning minimises the potential for noise disturbance, enhancing the learning environment for students with special educational needs.

- 7.21 In terms of airborne sound insulation, the existing separating walls between classrooms and other internal spaces are expected to meet the minimum BB93 requirements, with sound reduction performance levels of 50 dB Rw between SEN classrooms and 45 dB Rw between classrooms and circulation areas. The existing timber joist separating floors with suspended ceilings are expected to meet the BB93 standards for impact sound insulation, ensuring that noise transmission between floors remains within acceptable limits.
- 7.22 Reverberation times are also addressed in the report. The existing suspended ceilings with sound-absorbing ceiling tiles and retained carpet flooring in each teaching space are expected to provide sufficient acoustic absorption to meet the BB93 requirements for reverberation control, which specifies a maximum reverberation time of 0.4 seconds for SEN classrooms.
- 7.23 The acoustic assessment confirms that the proposed conversion to a school will provide a suitably quiet and controlled acoustic environment for students and staff. The existing building fabric and internal layout ensure that the BB93 noise limits will be satisfied without the need for significant additional noise mitigation measures.

Noise Impact on Neighbouring Properties

- 7.24 The proposed change of use to a state-funded school has also been assessed in terms of its potential noise impact on neighbouring properties. The key noise-generating activities associated with the proposed school use include:
- General classroom noise — sound generated from typical teaching activities, such as student conversations and teacher instruction.
 - Outdoor noise — sound generated from student break times, including talking, playing, and other recreational activities.
 - Arrival and departure noise — sound generated from staff and student movements during pick-up and drop-off times.



- Vehicular noise — noise from cars using the on-site parking area at the rear of the site.

7.25 The internal noise generated from classroom activities is expected to be contained within the building due to the existing masonry construction and the provision of high-performance sound-insulating internal walls. The building's existing window glazing is specified to provide a minimum sound reduction of 33 dB Rw, which is sufficient to prevent the transmission of internal noise to the surrounding properties. Additionally, classrooms and student gathering areas are located towards the rear of the building, further minimising the potential for noise escape towards neighbouring properties.

7.26 Break-time and outdoor activities are expected to be limited to the rear parking area, which will remain enclosed by boundary walls and fencing. The acoustic report estimates that noise levels from typical student activity will remain below 50 dB LAeq at the nearest noise-sensitive residential receptor, which aligns with the World Health Organization (WHO) guideline for acceptable outdoor noise levels in residential areas. Furthermore, break times will be limited to short periods during the school day, reducing the duration and impact of outdoor noise exposure.

7.27 Student and staff arrival and departure will occur primarily via the rear parking area. As this area is separated from neighbouring properties by existing boundary treatments, noise impact from this activity is expected to be minimal. Additionally, the majority of students are expected to travel to the school by public transport or on foot, thereby reducing potential vehicle-generated noise at peak times.

7.28 The use of the existing rear car park for staff and visitor parking will not increase vehicle noise levels beyond the established baseline for the Site when it is in office use. The acoustic report confirms that vehicle movements associated with the proposed use will remain well below the threshold for significant noise impact on nearby properties.

Noise Impact Conclusion

7.29 The acoustic assessment concludes that the proposed change of use to a school will provide a suitably quiet and controlled acoustic environment for students and staff,



while also ensuring that noise levels generated by the school will remain within acceptable limits for neighbouring properties. The existing building fabric, internal layout, and the enclosed nature of the rear parking area will ensure that noise levels remain within BB93 and WHO guidelines. Should there be further acoustic mitigations required, the applicant is happy to secure these by condition should the application be minded for approval. Therefore, it is considered that the proposed development will not have any adverse noise impact on either the intended occupiers or neighbouring properties.

Contamination Risks on the Site

7.30 An Asbestos Management Survey was carried out by Asbestos 247 Environmental Ltd on 28 September 2024 at St James House. The survey was conducted in accordance with HSG 264 (Asbestos: The Survey Guide) and aimed to identify and assess any asbestos-containing materials (ACMs) within the building to evaluate potential contamination risks associated with the proposed change of use to a state-funded school.

7.31 The survey identified the following key findings:

- Debris to floor – Insulating board debris was discovered in the detached outbuilding, with a material score of 9 (medium risk). The survey recommends removal by a licensed contractor.
- Floor tiles and adhesive – Reinforced plastic floor tiles containing chrysotile asbestos were identified, with a material score of 3 (very low risk). The survey recommends managing and annually re-inspecting this material.
- Panels to doors – Insulating board panels were found on doors within the detached outbuilding, with a material score of 9 (medium risk). Removal by a licensed contractor is recommended.
- Corrugated roof sheets and ridges – Cement materials containing chrysotile and crocidolite asbestos were identified, with a material score of 6 (low risk). Management and annual re-inspection are recommended.



- Flue – A cement flue containing chrysotile and crocidolite asbestos was identified, with a material score of 6 (low risk). Management and annual re-inspection are recommended.
- Rainwater goods and downpipes – Cement materials containing chrysotile and crocidolite asbestos were identified in rainwater goods and downpipes, with a material score of 6 (low risk). Management and annual re-inspection are recommended.

7.32 The report confirms that the asbestos materials identified are either low or medium risk, and where removal is recommended, this will be managed through professional remediation measures prior to the commencement of development.

Established Low-Risk Use and Justification for No Further Reporting

7.33 The Site has been in continuous use as an office space (Use Class E) for over 40 years. Office use generally presents a low risk of contamination compared to industrial or manufacturing activities. The long-standing commercial use without any recorded incidents of contamination supports the conclusion that the Site does not pose any underlying contamination risks.

7.34 There is no historical evidence of previous high-risk uses, such as industrial operations, fuel storage, or landfilling, which could give rise to contamination concerns. The Site's established history as an office supports the conclusion that the risk of contamination from historic land use is negligible.

7.35 Furthermore, the proposed change of use to a state-funded school does not involve any ground disturbance or excavation that could potentially uncover or release contaminants. The change of use will retain the existing building structure and external areas, ensuring that any potential contamination (if present) remains undisturbed.

7.36 Given the Site's established low-risk use and the absence of any contamination evidence beyond the identified asbestos, it would be disproportionate and unjustified to require a Phase 1 Contamination Report. The asbestos survey has already addressed any identifiable contamination within the building fabric, and no further risk



assessment is considered necessary.

Contamination Risks Conclusion

- 7.37 The proposed change of use to a state-funded school is not expected to result in any significant contamination risks. The asbestos-containing materials identified within the survey are either low or medium risk and are confined to specific areas. Appropriate mitigation measures, including removal or ongoing management and monitoring, will ensure that the Site remains safe for the intended school use.
- 7.38 Given the long-standing low-risk commercial use of the Site, the absence of historic contamination concerns, and the findings of the asbestos survey, it is considered that the proposal will not give rise to any unacceptable contamination risks. Should there be further contamination mitigations required, the applicant is happy to secure these by condition should the application be minded for approval. Therefore, the application meets the requirements for prior approval under Class T of the GPDO 2015.

Compliance with Class T Criteria

- 7.39 The accompanying proposed plans demonstrate that the proposed internal reconfiguration aligns with the requirements of Class T. The proposed school layout will create dedicated classrooms, therapy spaces, and support rooms tailored to the needs of students with Special Educational Needs (SEN).
- 7.40 The overall internal changes are consistent with the Site's existing scale and character, ensuring compatibility with the surrounding area.

Operational Impact and Future Flexibility

- 7.41 While Pierview Academy is the intended operator, the approval under Class T would provide flexibility for future use by any other state-funded school without the need for a new planning application. This ensures that the Site can continue to be used for educational purposes in the long term, supporting the delivery of specialist educational services within the borough.

Other Permitted Development Requirements

- 7.42 Finally, the standards have been assessed against the various proposed



development elements and the following was determined:

Permitted Development	Complies?
Development consisting of a change of use of a building and any land within its curtilage from a use falling within one of the following provisions of the Use Classes Order— (a)Class C1 (hotels) of Schedule 1; (b)Class C2 (residential institutions) of Schedule 1; (c)Class C2A (secure residential institutions) of Schedule 1; or (d)Class E (commercial, business or service) of Schedule 2, to use as a state-funded school falling within Class F.1(a) of Schedule 2 to that Order.	YES

Permitted Development	Complies?
Development is not permitted by Class T if— (b)the site is, or forms part of, a military explosives storage area; (c)the site is, or forms part of, a safety hazard area; or (d)the building is a listed building or a scheduled monument.	YES

Conditions	Complies?
Development is permitted by Class T subject to the following conditions— a) the site is to be used as a state-funded school falling within Class F.1(a) of Schedule 2 to the Use Classes Order and for no other purpose, except to the extent that the other purpose is ancillary to the primary use of the site as such a state-funded school.	YES
b) before beginning the development, the developer must apply to the local planning authority for a determination as to whether the prior approval of the local planning authority will be required as to (i)transport and highways impacts of the development; (ii)noise impacts of the development; and (iii)contamination risks on the site, and the provisions of paragraph W (prior approval) of this Part apply in relation to that application.	YES



(2) Subject to sub-paragraph (3), development under Class T must begin within a period of 3 years starting with the prior approval date.	N/A
(3) Where, in relation to a particular development under Class T, planning permission is granted on an application in respect of associated operational development before the end of the period referred to in sub-paragraph (2), then development under Class T must begin within the period of 3 years starting with the date that planning permission is granted.	N/A
(4) For the purposes of sub-paragraph (3), "associated operational development" means building or other operations in relation to the same building or land which are reasonably necessary to use the building or land for the use proposed under Class T.	N/A



8.0 CONCLUSION

- 8.1 This Planning Statement has demonstrated that the proposed development at St James House, 6-8 Overcliffe, Gravesend, DA11 0HJ, which seeks the change of use from an existing office building (Use Class E) to a state-funded Special Educational Needs (SEN) school (Use Class F.1(a)), is fully compliant with the regulations set out under Schedule 2, Part 3, Class T of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).
- 8.2 In support of this application, full assessments have been submitted addressing the matters required under Paragraph T.2(1)(b), including the transport and highways impact, noise impact on intended occupiers, and contamination risks associated with the Site. The supporting information clearly demonstrates that the proposed use will not result in any unacceptable impacts in any of these areas. The existing parking provision will remain unaltered and will be available for staff and visitors, while cycle storage will be introduced in line with sustainable transport objectives. An acoustic assessment confirms that internal and external noise levels will remain compliant with BB93 requirements for SEN facilities, and an asbestos management survey confirms that all contamination risks identified can be managed or mitigated appropriately. The building's long-standing commercial use and absence of any industrial history further support the conclusion that no significant contamination risk exists.
- 8.3 The lawful existing use of the Site as an office is well established, with the building having been continuously occupied for at least two decades by the Carley Partnership, a firm of chartered accountants. This professional use clearly falls within Use Class E(c)(iii), and visual evidence from Google Street View (dated December 2019) further supports the ongoing commercial nature of the premises prior to the introduction of the amended Use Classes Order in September 2020. As there have been no intervening uses, and the building has remained vacant only since the Carley Partnership's departure in 2024, it is appropriate to conclude that the lawful use of the building remains within Class E, and thus eligible for permitted development rights under Class T.
- 8.4 The proposal also respects the building's location within the Overcliffe Conservation



Area. No external alterations are proposed as part of the change of use, and therefore there will be no impact on the visual character or appearance of the Conservation Area. The retention of the existing building fabric and layout ensures that the building's contribution to the streetscape remains entirely unaffected. Furthermore, the proposed use is wholly compatible with surrounding land uses, which include a mix of commercial, residential, and institutional buildings, contributing positively to the local area by increasing access to specialist education provision.

- 8.5 The proposed development will deliver a well-considered and highly beneficial use for the local community through the establishment of a state-funded SEN school operated by Pierview Academy, or, in the event of a future change, another qualified state-funded education provider. The use of this centrally located and sustainably accessed building for educational purposes aligns with the Government's wider objectives to improve educational infrastructure and to make better use of existing buildings through permitted development legislation.
- 8.6 With all relevant prior approval conditions addressed, and the proposal falling squarely within the scope of Class T, it is concluded that the change of use qualifies as permitted development. The Local Planning Authority is therefore respectfully invited to confirm that the proposed development meets the necessary requirements, and that prior approval is either not required, or where it is required, should be granted in accordance with the provisions of the GPDO.

END.



Directive Planning and Developments Ltd

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info@directiveplanning.co.uk

+447885737434