



Gravesham Borough Council

Civic Centre
Windmill Street
Gravesend
Kent
DA12 1AU

Highways and Transportation

Kroner House
Eurogate Business Park
Ashford
TN24 8XU

Tel: 03000 418181

Date: 24 June 2025

Our Ref:

Application - GB/20250293

Location - St James House, 6 - 8 Overcliffe, Gravesend, Kent

Proposal - Application to determine if prior approval is required for a proposed; Change of use from Comercial/Business/Service (Class E), Hotels (Class C1), Residential Institutions (Class 2A/C2A), to State-Funded School(Class F1 (A)) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) - Schedule 2, Part 3, Class T.

Thank you for your consultation in relation to the above planning application. I have the following comments to make with respect to highway matters :-

Further to my previous response dated 14th April 2025, a Transport Statement dated 12th June 2025 covering the issues raised in my response has been submitted.

It has been demonstrated that the site is in a very sustainable location close to Gravesend town centre, many bus services including FastTrack, and the railway station. There is therefore not a reliance for both staff and pupils to use the private car.

Car parking provision of 20 spaces for staff / visitors is more than adequate and exceeds the Kent Parking Standards (Jan 2025). Drop-off provision for pupils is provided at the front of the building. Cycle parking for 2 cycles is proposed and considered to be adequate for the proposed staff.

It has been shown in the TS that traffic generation from the proposal is expected to be slightly higher than the existing office use but not at peak times. This is acceptable and does not justify any objection.

I note that the pupil and staff numbers are expected to increase within 5 years of opening to a maximum of 30 pupils and 12 staff. Since the TS is based on these numbers I would recommend that any consent granted includes a **Condition** to limit the school staff and pupil numbers to those levels without the prior written consent of the LPA.

I therefore raise no objection to this application provide the following conditions are applied to any consent granted in addition to one relating to pupil / staff numbers indicated above:

1 Provision and permanent retention of the vehicle parking spaces shown on the submitted plans prior to the use of the site commencing.

2 Provision and permanent retention of secure, covered cycle parking facilities prior to the use of the site commencing in accordance with details to be submitted to and approved by the Local Planning Authority.

3 The development shall not be brought into use until a Travel Plan, to reduce dependency on the private car, has been submitted to and approved in writing by the Local Planning Authority. The Travel Plan shall include objectives and modal-split targets, a programme of implementation and provision for monitoring, review and improvement. Thereafter, the Travel Plan shall be put into action and adhered to throughout the life of the development, or that of the Travel Plan itself, whichever is the shorter.

It is important to note that Local Planning Authority (LPA) permission does not convey any approval to carry out works on or affecting the public highway.

Any changes to or affecting the public highway in Kent require the formal agreement of the Highway Authority, Kent County Council (KCC), and it should not be assumed that this will be a given because LPA planning permission has been granted.

For this reason, anyone considering works which may affect the public highway, including any highway-owned street furniture or landscape assets such as grass, shrubs and trees, is advised to engage with KCC Highways and Transportation at an early stage in the design process.

Across the county there are pieces of land next to private homes and gardens and near the highway that do not look like roads or pavements but are actually part of the public highway.

Some of this highway land is owned by Kent County Council whilst some is owned by third party owners. Irrespective of the ownership, this land may have 'highway rights' over the topsoil.

Works on private land may also affect the public highway. These include works to cellars, to retaining walls which support the highway or land above the highway, and to balconies, signs or other structures which project over the highway. Such works also require the approval of the Highway Authority.

Kent County Council has now introduced a pre-application advice service in addition to a full formal technical approval process for new or altered highway assets, with the aim of improving future maintainability. Further details are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>.

This process applies to all development works affecting the public highway other than applications for vehicle crossings, which are covered by a separate approval process. Further details on this are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/apply-for-a-dropped-kerb/dropped-kerb-contractor-information>

Once planning approval for any development has been granted by the LPA, it is the responsibility of the applicant to ensure that before development commences, all necessary highway approvals and consents have been obtained, and that the limits of the highway boundary have been clearly established, since failure to do so may result in enforcement action being taken by the Highway Authority.

The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under the relevant legislation and common law. It is therefore important for the applicant to contact KCC Highways and Transportation to progress this aspect of the works prior to commencement on site.

Further guidance for applicants, including information about how to clarify the highway boundary and links to application forms for vehicular crossings and other highway matters, may be found on Kent County Council's website:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>. Alternatively, KCC Highways and Transportation may be contacted by telephone: 03000 418181.

Yours faithfully

Director of Highways & Transportation

*This is a statutory technical response on behalf of KCC as Highway Authority. If you wish to make representations in relation to highways matters associated with the planning application under consideration, please make these directly to the Planning Authority.