

Planning Department
Gravesham Borough Council
Civic Centre,
Windmill Street,
Gravesend,
Kent,
DA12 1AU

Date: 29th August 2025
Ref: K0022-J3

Dear Sir/Madam,

RE: St James House, 6-8 Overcliffe, Gravesend, Kent, DA11 0HJ

Application to Discharge Planning Conditions 1 (Cycle Storage Details) and 2 (Travel Plan) relating to planning permission ref. 20250293

Introduction

I am writing on behalf of **Tower Group Developments Ltd** (*'the Applicant'*) to submit an application for the **Approval of Details Reserved by Condition 1 (Cycle Storage Details) and Condition 2 (Travel Plan)**, attached to the grant of planning permission ref. **20250293** at **St James House, 6–8 Overcliffe, Gravesend, Kent, DA11 0HJ**.

The approved scheme requested planning permission for:

"Application to determine if prior approval is required for a proposed; Change of use from Commercial/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."

In accordance with the Decision Notice, Conditions 1 and 2 require the submission and approval of cycle storage details and a Travel Plan prior to first use of the site. This covering statement, alongside the submitted drawings and technical reports, demonstrates how the proposals fully satisfy the requirements of the conditions, provide robust mitigation measures, and align with the relevant policy framework.

Condition 1 (Cycle Storage Details)

Condition Requirement

Condition 1 of **Decision Notice 20250293**, states the following:

- i. *Prior to the use of the site commencing, details of the cycle storage facilities including elevations of a secure, covered and weatherproof enclosure shall be submitted to and approved in writing by the Local Planning Authority. These facilities shall be made available for use prior to first occupation of the school hereby approved and retained for use by site users at all times thereafter.*

Reason: *In order to encourage options for sustainable travel in accordance with Policies CS11 and CS19 of the Gravesham Local Plan Core Strategy (2014).*



Condition 1 Implementation Context

The **Delegated Officer's Report 20250293** and statutory consultation response from Kent County Council Highways both emphasised the importance of secure, weatherproof cycle storage to encourage non-car travel and meet the needs of staff and pupils. KCC's consultation response specifically advised:

- *"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."*

Cycle parking was therefore considered a fundamental mitigation measure to address transport impacts of the new school use.

Proposed Cycle Storage Details

The submitted **Secure Cycle Storage Details (Drawing Ref. DOC/6-8OC/SD100)** shows the installation of a 10 Space Original Shelter manufactured by The Bike Storage Company.

Key features include:

- **Capacity:** Storage for 10 bicycles, exceeding minimum KCC and Gravesham standards.
- **Design:** A modular, lockable unit manufactured in hot-dipped galvanised steel with a UV-resistant polycarbonate roof to ensure full weatherproofing.
- **Security:** Option for gated access with mechanical/digital locking systems, ensuring bicycles are protected from theft and misuse.
- **Location:** Positioned within the secure rear car park with step-free access, ensuring convenience for both staff and pupils.
- **Durability:** Built to BS EN ISO 1461:2022 standards, supported by a 10-year manufacturer's warranty, ensuring long-term resilience.

This facility is robust, scalable, and consistent with modern best practice in promoting cycle use. It provides a safe, accessible, and durable solution that will remain available for all site users throughout the lifetime of the development.

Condition 2 (Travel Plan)

Condition Requirement

Condition 2 of **Decision Notice 20250293**, states:

- 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.*



Reason: To promote sustainable travel and reduce car dependency in accordance with Policies CS11 and CS19 of the Gravesham Local Plan Core Strategy (2014).

Condition Implementation Context

The Delegated Officer's Report recognised that the SEN school use generates a distinct transport profile, with most pupils arriving via local authority-arranged taxis or carers rather than independently. This concentrated pattern of drop-off and pick-up has potential to create congestion on the A226 Overcliffe and impact bus priority measures if unmanaged.

Accordingly, the condition requires a robust Travel Plan to:

- Set clear objectives and modal-split targets (particularly for staff and visitors);
- Establish an implementation framework with a Travel Plan Co-ordinator and awareness initiatives;
- Provide monitoring and review mechanisms to ensure compliance; and
- Formalise safeguarding protocols for staggered, supervised drop-off and pick-up.

Submitted Travel Plan

The **School Travel Plan (Crosby Transport Planning, Ref. PC/P25078 STP, dated August 2025)** sets out a detailed framework for achieving sustainable transport outcomes. Key elements include:

- **Objectives:** To reduce single-occupancy car trips, promote walking, cycling, and public transport, and ensure safe and efficient drop-off and pick-up operations.
- **Modal-Split Targets:** Staff targets for increased walking and cycling, with exploration of taxi-sharing arrangements for SEN pupils.
- **Implementation Programme:** Appointment of a **Travel Plan Co-ordinator**, installation of a green travel noticeboard, promotion of active travel, and liaison with local authorities.
- **Monitoring and Review:** Annual surveys, monitoring of staff and visitor travel, and regular reporting to Gravesham Borough Council.
- **Action Plan:** A phased timetable of initiatives (Table 7.1 of the STP) including installation of cycle facilities, newsletters, cycle forums, and liaison with Kent County Council.

The plan is proportionate to the scale and nature of Pierview Academy, realistic given the SEN pupil profile, and enforceable over the lifetime of the development.

Policy and Guidelines Context

The submitted details align with the following:

- **Gravesham Local Plan Core Strategy (2014):**



- Policy CS11 (Transport): *requires new development to minimise car dependency and support sustainable transport modes.*
- Policy CS19 (Development and Design Principles): *ensures development is inclusive, sustainable, and mitigates transport impacts.*
- **Kent County Council Guidance:** Supports secure cycle storage and School Travel Plans as fundamental requirements for school-based development.
- **NPPF (2024):** Paragraphs 115–120 require development to maximise opportunities for sustainable travel, supported by high-quality facilities and Travel Plans for significant trip-generating uses.

Application for Condition Discharge

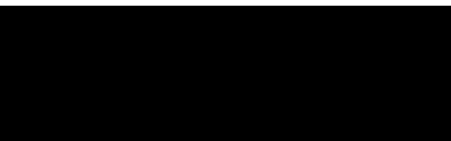
This submission to discharge Conditions 1 and 2 comprises the following:

- **Completed Application Form with Certificate A;**
- **Covering Statement** (*prepared by Directive Planning and Developments Ltd*);
- **Secure Cycle Storage Details** (*ref. DOC/6-8OC/SD100*);
- **10 Space Original Shelter Specification** (*produced by The Bike Storage Company*); and
- **School Travel Plan** (*produced by Crosby Transport Planning Ltd*)

The statutory fee of **£383.00** has been paid via the Planning Portal.

We trust that the submitted information comprehensively addresses the requirements for discharging Conditions 1 and 2 of planning permission 20250293. We respectfully request written confirmation of discharge at the earliest opportunity. Should any additional clarification be required, we remain at your disposal.

Yours sincerely,



Hector Melendez LLB (Hons.)
Director
Directive Planning and Developments