



Delegated Report

Planning Application

Planning Application No: 20260309

Location: Bennett And Brown, 21 - 24 Windmill Street, Gravesend DA12 1AS

Description: Change of use of retail premises to a cafe with alterations to the existing shop front to provide a new entrance door and direct access from the street. Installation of an external flue to rear.

Applicant: Mrs Lauren Turner

Site Visit Date: 13 May 2026

Submitted Documents/Plans

Drawing no. 0001 rev P2 (existing ground and first floor plans)
Drawing no. 0004 rev P1 (existing ground and first floor plans)
Drawing no. 0002 rev P5 (existing and proposed front elevation)
Drawing no. 0003 rev P3 (existing and proposed rear elevations)
Block Plan
Site location plan
Heritage Statement
Extractor Specification
Photo of corbels, front elevation and rear elevation

Relevant Planning History

20260310	Consent to display advertisement(s); Installation of two illuminated fascia signs to front elevation.	Pending Consideration	
20071097	External illumination to existing fascia sign.	Application Refused, appeal dismissed	12.02.2008
20050273	Amendments to the approved scheme to allow a first floor extension to provide enlarged shop on single storey rear extension previously permitted under planning permission reference number GR/04/304.	Permitted	26.05.2005
20040304	Erection of first floor extension to the rear of nos. 21 and 22 and single storey extension at the rear of no. 24 to provide enlarged retail areas and erection of an external fire escape staircase at the rear of	Permitted	27.05.2004

no. 23.

19940357	Display of an internally illuminated double sided projecting box sign at first floor level.	Application Refused	31.08.1994
19940169	Erection of rear extension at first floor level to form enlarged retail area.	Permitted	27.05.1994
19930121	Change of use of ground floor from shop to class A3 (Food & drink) and installation of an external ventilation duct at the rear.	Application Refused	16.06.1993
19900091	Display of an internally illuminated fascia sign.	Consent for Advert	26.02.1990
19840889	Change of use of printing workshop and warehouse at the rear of 21 and 22 Windmill Street to retail shop	Permitted	17.12.1984
19840795	Installation of new shopfront	Permitted	20.11.1984
19830422	Installation of new shopfront	Application Refused	28.11.1983
19830327	Erection of a single storey extension at the rear to form a warehouse and the surfacing of the residue of the land at the rear to form a lorry loading offloading area and car parking space	Permitted	20.07.1983
19810578	Erection of single storey rear extension to form store and wc	Permitted	30.11.1981
19790424	Display of illuminated fascia lettering	Consent for Advert	11.06.1979
19790146	Installation of a new shop front	Permitted	22.05.1979

Development Plan

Gravesham Local Plan Core Strategy (September 2014):

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS05 – Gravesend Town Centre Opportunity Area
- CS07 – Economy, Employment and Skills
- CS08 – Retail, Leisure and the Hierarchy of Centres
- CS10 – Physical and Social Infrastructure
- CS11 - Transport
- CS12 – Green Infrastructure
- CS18 – Climate Change

- CS19 - Development & Design Principles
- CS20 – Heritage and the Historic Environment

Gravesham Local Plan: First Review (1994)

- Policy P3 – Vehicle Parking Standards
- Policy S6: Local Centres
- Policy S7: Hot Food Shops and Restaurants and other A3 uses
- Policy TC1: Design of New Development
- Policy TC3: Development affecting Conservation Areas
- Policy TC9 - Shopfronts

Paragraph 34 of the NPPF (2024) sets out that policies within adopted local plans should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Such reviews are also a legal requirement as set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012.

The Council undertook such a review in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the NPPF (2024), the Council will also seek to replace these.

National Planning Policy Framework (2024)

- Section 2 – Achieving sustainable development
- Section 4 – Decision-making
- Section 8 – Promoting healthy and safe communities
- Section 12 – Achieving well-designed places
- Section 16 – Conserving and enhancing the historic environment

Supplementary Planning Guidance

- Design for Gravesham: Design Code (2024);
- SPG 4 - KCC Parking Standards (2006);
- Upper Windmill Street Conservation Area Appraisal (2009)
- Security Measures for Shopfronts and Commercial Premises SPG4

Other material considerations

Section 16 (2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires special regard to be had to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses when considering whether to grant listed building consent.

Section 72(1) of the Act requires special attention to be paid to the desirability of preserving or enhancing the character or appearance of the conservation area.

Emerging Local Plan as a Material Consideration

Paragraph 48 of the Framework makes it clear that planning applications can only be determined in accordance with the development plan, unless material considerations indicate otherwise. An emerging Local Plan, does not form part of the Development. The Framework, at Paragraph 49 allows local planning authorities to give weight to relevant policies in emerging Local Plans, according to:

- The stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- The extent to which there are unresolved objections to relevant policies (the less significant the

- unresolved objections, the greater the weight that may be given); and
- The degree of consistency of the relevant policies in the emerging plan to the Framework, the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given to those policies.

West Oxfordshire District Council v Secretary of State for Housing, Communities and Local Government & Rosconn Strategic Land Ltd [2018] EWHC 3065 (Admin) is a High Court judgement that deals with the weight to be given to a Regulation 19 Local Plan. In this judgement the Court found that the weight to be given to an emerging Local Plan, was a matter of planning judgement, which had to be reached having fully considered the relevant part (Paragraph 49) of the Framework.

The Council's emerging Local Plan, is in the process of being consulted upon (it has reached Regulation 19 stage), the Council is not yet aware of whether third parties will support or object to specific policies within the Plan, or whether they will consider the policies with the emerging Local Plan to be broadly sound and consistent with the NPPF (2024). Taking this into consideration, one can only conclude that at this stage of the process, **limited (i.e. minimal) weight should be afforded to the emerging Regulation 19 Local Plan**. This position would only change once the emerging Local Plan has progressed towards submission and examination, with the Council being fully aware of policies that are subject to unresolved objections and with knowledge of policies that have had their soundness and conformity against the Framework challenged.

This approach accords with the approach taken in a separate High Court case, Gladman Developments Ltd v SSHCLG & Corby Borough Council; & Uttlesford DC [2020] EWHC 518 (Admin) and Court of Appeal [2021] EWCA Civ 104, which was also the subject of a Court of Appeal Ruling [2021] EWCA Civ 104.

Consultations, Publicity and Representations

Consultees

GBC Environmental Protection Officer

A low level horizontal outlet is not considered to be acceptable.

With regard to the following comment *'The extraction system will comprise stainless steel baffle filters within the extraction canopy, together with activated carbon filtration installed within the ductwork prior to discharge through the extraction flue.'* The carbon filters aren't shown on the plan and I'm not sure where they can be fitted as the plan indicates that the canopy will be over the cooking area right up against the back wall. There is no space to fit carbon filters which can be quite bulky?

Noted are the comments from the applicant regarding the type of cooking. However, they are still proposing to use ovens, grills, hobs. It's also a large space with lots of seating/covers, so potentially it could be a busy place. Adequate extraction will be needed. Also, the difficulty we have is that this is a change of use to a café and then the café closes, another café/restaurant could open that serves more odorous/greasy foods which the proposed extract system can't cope with.

I am prepared to for this to be dealt with this by conditions as follows:

Restaurant/Café Odour

Prior to any works commencing on site, the applicant shall:

- 1) Submit a scheme in writing to the Local Planning Authority for approval in relation to cooking odour/fume control. The extraction system must be designed and installed in accordance with the "EMAQ/Defra Control of Odour and Noise from Commercial Kitchen Exhaust Systems (2018 update)".Full

details of proposed extraction system to deal with grease and odour control should include:

- a) Plans and details of all duct work (internal and external) and equipment.
- b) Plans showing the location/position of the external flue/discharge stack, including its position in relation to neighbouring properties and window openings.
- c) Details of all grease filtration and odour control including the manufacturer's specification/data sheets. This includes the canopy.
- d) Details, including manufacturer's specification/data sheets of the fan.
- e) Details of proposed routine cleaning and maintenance of the system, and the service requirements of the installed odour control system, including details of system access panels and confirmation that they will be grease tight.
- f) Details of the type of food to be cooked, the cooking time per day; and the type of cooking appliances to be used.

Where the end user is not yet known, the extraction system shall be designed for a 'very high' grease content, a 'very high' level of odour potential and a 'very high' smoke content (EMAQ/Defra Control of Odour and Noise from Commercial Kitchen Exhaust Systems (2018 update)).

- 2) Install and commission the extract system using a competent ventilation engineer in accordance with approved details. Provide a commissioning report to the LPA to verify the installation, ensuring minimum discharge rates are included.

The extraction and odour/fume control equipment shall be maintained and operated in compliance with the approved scheme. After installation of the approved plant, no new plant or ducting system shall be used without the written consent of the Local Planning Authority.

Reason: In the interests of protecting the amenity of adjoining/nearby residential properties and safeguarding the amenities of the surrounding area

Restaurant/Takeaway Noise

Prior to any works commencing on site, the applicant shall:

- 1) Submit a scheme in writing, including a noise survey, to the Local Planning Authority for approval in relation to noise control. The extraction system must be designed and installed in accordance with the "EMAQ/Defra Control of Odour and Noise from Commercial Kitchen Exhaust Systems (2018 update)". The noise survey should assess the worst-case scenario noise impact from the proposed extract and ventilation system, on nearby residential properties and must:
 - a) Assess the whole system and any tonal elements associated it; a 1/3 octave band analysis may be necessary.
 - b) Assess structural transmission with the use of anti-vibration mounts where necessary, linings to ductwork to prevent noise transmission, any inline silencers and provide details of where they have been installed.
 - c) Use the results of the noise survey to ensure that the noise generated at the boundary of any noise sensitive property meets the requirements laid down in BS4142:2014 "Method for Rating and Assessing Industrial and Commercial Sound".
- 2) Install and commission the extract system using a competent ventilation engineer in accordance with approved details. Provide a commissioning report to the Local Planning Authority to verify the installation, including post completion noise levels.

The equipment shall be maintained and operated in a condition such that the requirements of BS4142:2014 continue to be met. After installation of the approved plant, no new plant or ducting system shall be used without the written consent of the Local Planning Authority.

Reason: In the interests of protecting the amenity of adjoining/nearby residential properties and

safeguarding the amenities of the surrounding area

GBC Conservation Officer

Definitely not black all over. The application site lies within a designated Conservation Area, where development should preserve or enhance the area's special architectural and historic character. The proposed colour treatment fails to achieve this objective and would introduce an unnecessarily dominant and visually intrusive appearance that is at odds with the established character of the streetscape.

RAL 7021 is a very dark, almost black colour which would result in the building presenting as a heavy and overly prominent element within the street scene. Such a stark treatment is not characteristic of the more traditional palette generally associated with historic buildings and shopfronts within conservation areas, where lighter and more muted colours are typically employed to complement architectural detailing and maintain visual harmony.

The proposed scheme would draw disproportionate attention to the premises, creating an unduly assertive frontage that competes with, rather than respects, neighbouring historic properties. This risks eroding the cohesive appearance of the Conservation Area and diminishing the appreciation of the building's architectural features.

A more appropriate and sympathetic approach would be to reverse the proposed colour arrangement, with the main frontage finished in **RAL 9001 (Cream)** and the lettering and signage in **RAL 7021 (Black Grey)**. This alternative would:

- Better reflect traditional shopfront colour palettes commonly found within historic settings;
- Provide a softer and more visually balanced appearance;
- Preserve the prominence of architectural details rather than overwhelming them with a dark façade treatment;
- Maintain adequate contrast and legibility for signage without creating visual harm;
- Better preserve and enhance the character and appearance of the Conservation Area, consistent with the objectives of local and national heritage policy.

The proposed reversal would achieve the applicant's commercial objectives while ensuring that the development remains sensitive to its historic context. It would therefore represent a more proportionate and conservation-led design solution.

For these reasons, I respectfully request that the Local Planning Authority either refuse the proposed colour scheme as submitted or secure a revised and more sympathetic treatment through condition or amendment, adopting RAL 9001 as the principal façade colour with lettering in RAL 7021.

Shopfront

The application presents a welcome opportunity to improve the appearance of the shopfront and enhance its contribution to the character of the Conservation Area. In particular, consideration should be given to reducing the height of the proposed fascia sign and reinstating it to a more traditional and historically appropriate proportion.

The existing fascia depth appears excessive and diminishes the visual relationship between the shopfront elements, particularly the pilasters, corbels and upper architectural detailing. A reduced fascia height would better reflect the original design intent of the building and restore the correct proportions of the shopfront.

There is a nearby example of a traditional shopfront at R C Bathrooms that retains its original fascia dimensions, demonstrating how a shallower fascia allows the pilasters and corbels to remain visually prominent and contributes positively to the overall streetscape. This provides a useful local precedent for the treatment of the application property.

Reducing the fascia height would also create the opportunity to reinstate a projecting cornice above the fascia, which is a characteristic feature of traditional shopfront design. Such a cornice could incorporate discreet concealed illumination, avoiding the need for more visually intrusive forms of signage lighting. A successful local example can be seen at the Ladbroke's premises on Windmill Street, where concealed lighting is integrated within the shopfront cornice, providing effective illumination while preserving the quality and appearance of the historic frontage.

The Local Planning Authority is therefore encouraged to seek amendments to the proposal that:

- Reduce the height of the fascia sign to a more traditional proportion;
- Reinstate a properly detailed cornice above the fascia;
- Ensure the pilasters and corbels remain fully visible and visually dominant elements of the shopfront composition;
- Incorporate concealed illumination within the reinstated cornice in place of more prominent lighting installations; and
- Follow established local examples of well-designed traditional shopfronts within the town centre.

These amendments would significantly improve the design quality of the proposal and better preserve and enhance the character and appearance of the Conservation Area, whilst still providing a clear and effective commercial presence for the occupier.

The applicant submitted an amended drawing (revision P5) which addressed these concerns and no objection was raised.

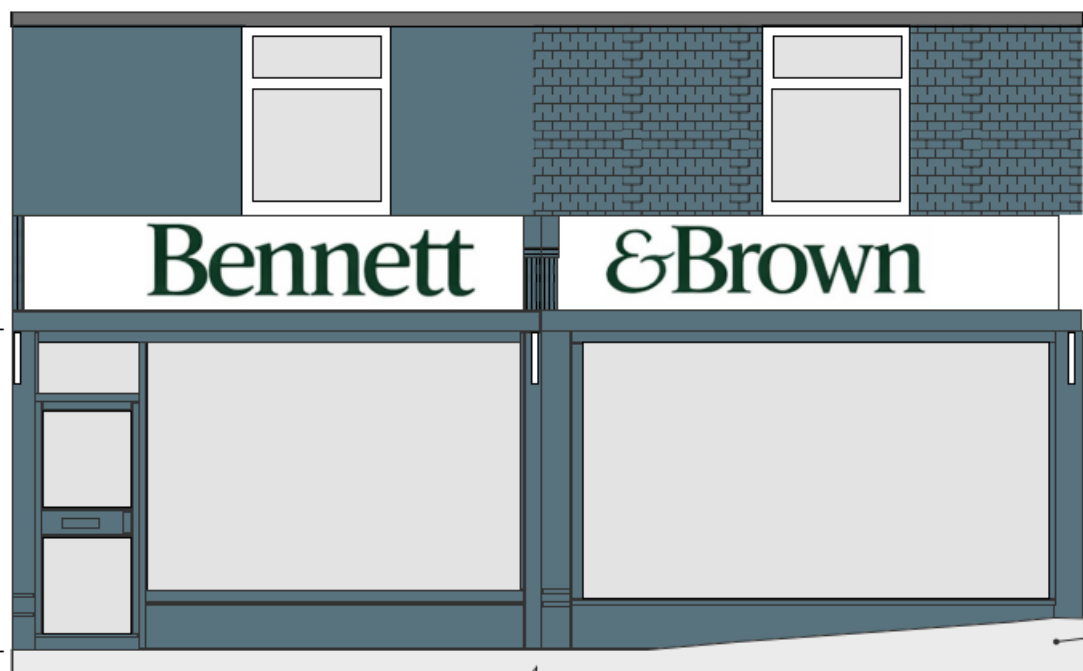
Neighbouring properties

The application has been advertised by site notice, press notice and individual letters to two neighbouring properties. No letters of representation have been received.

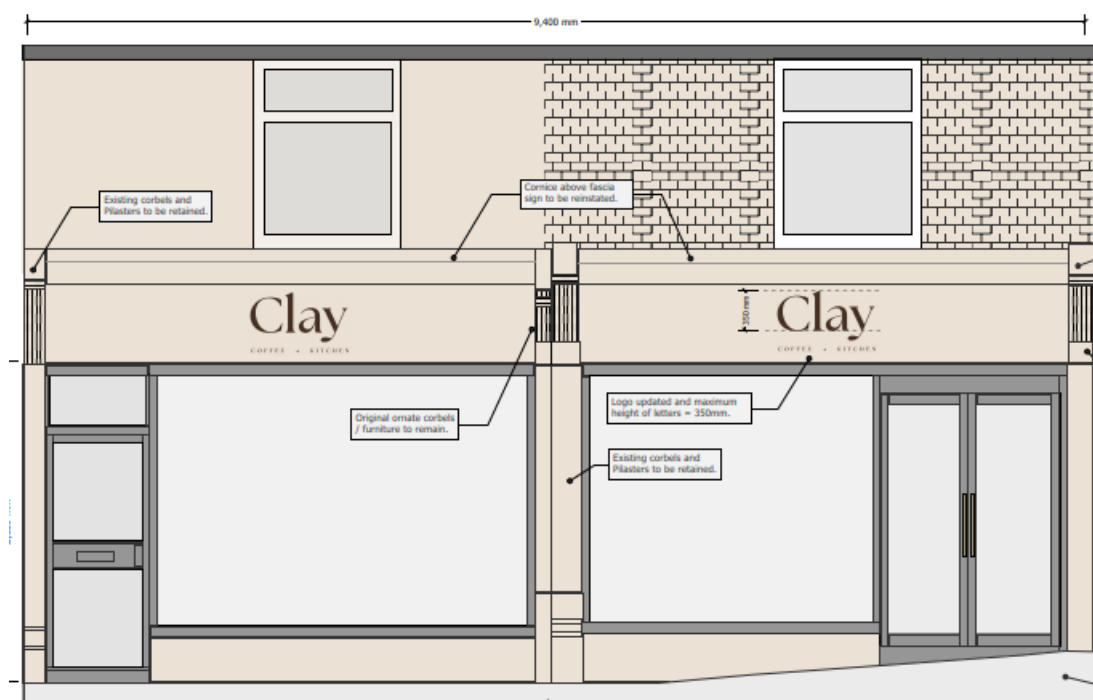
Officer's Analysis

Proposal

This application seeks planning permission for the change of use of retail premises to a cafe with alterations to the existing shop front to provide a new entrance door and direct access from the street. The current use is a shop (Class E (a)) and the proposed use will be a café (Class E (b)). The works also include the painting of the shopfront and installation of an external flue to rear. The existing and proposed plans are shown below:



EXISTING FRONT ELEVATION
@ 1:25



The proposal does not include the signage which is subject to a separate application (20260310).

Principle of development

The application site is located within Gravesend Town Centre where the principle of such a development is acceptable.

Policy CS05 states that the town centre is the principle focus for town centre related economic and social activity in the Borough.

Policy CS08 states that Gravesend town centre will be maintained as the highest order centre within the Borough and retail, leisure, entertainment facilities and the more intensive sport and recreation uses will,

unless otherwise allowed for under this policy, be directed as to the Primary Shopping Area as shown on the Policies Map.

Whilst policy S7 was 'saved' and remains material in determining any application, with the weight accorded it dependent on its consistency with the NPPF, policy S6 was superseded by Local Plan Core Strategy (2014) policy CS08 on Retail, Leisure and the Hierarchy of Centres. This seeks to reinforce a sustainable network and hierarchy of centres and affords protection to existing local centres to safeguard their retail character and function. Development that would adversely affect their vitality and viability is to be resisted under the policy. Saved policy S7 (Hot Food Shops and Restaurants and other A3 units) states that such uses should not cluster with other similar uses to create a dead frontage, should not have a detrimental effect on the amenity of any nearby residential accommodation, should have adequate parking and ventilation trunking should be as discreetly located on the building. Saved Policy S7 remains part of the adopted development plan and carries material weight, subject to consistency with the National Planning Policy Framework.

The site lies within a defined town centre location where commercial and service uses are supported in principle. As a town centre location, where there is no evidence of food uses having an adverse impact on local health, pollution or anti-social behaviour, the application site is considered acceptable under paragraph 97 of the NPPF (2024).

The following is a sample of the nearby units, their use classes and opening hours.

Unit no./name	Use Class	Opening Hours
Nutrimax 4 U (no. 15)	E(a)	Monday : CLOSED Tuesday : 8:30 am – 5 pm Wednesday : 8:30 am – 5 pm Thursday : 8:30 am – 5 pm Friday : 8:30 am – 5 pm Saturday : 10 am – 4 pm Sunday : 10 am – 4 pm
Mindful Movement reformer Pilates (no. 16)	E(d)	Monday 7 am–1 pm, 5:30–8:30 pm Tuesday 7–11:30 am, 5:30–8:30 pm Wednesday 7–11:30 am, 5:30–8:30 pm Thursday 6–10 am, 12–2 pm, 5:30–8:30 pm Friday 7–11 am, 5:30–8:30 pm Saturday 8 am–12 pm Sunday 8 am–1 pm
Post and Packing (no. 17)	E(a)	Monday 8:30 am–6:30 pm Tuesday 8:30 am–6:30 pm Wednesday 8:30 am–6:30 pm Thursday 8:30 am–6:30 pm Friday 8:30 am–6:30 pm

		Saturday 9 am–2 pm Sunday Closed
RC Bathrooms (no. 18)	E(a)	Monday 10 am–5 pm Tuesday 10 am–5 pm Wednesday 10 am–5 pm Thursday 10 am–5 pm Friday 10 am–5 pm Saturday Closed Sunday Closed
Regent Pharmacy (no. 19)	E(a)	Monday 9 am–6 pm Tuesday 9 am–6 pm Wednesday 9 am–6 pm Thursday 9 am–6 pm Friday 9 am–6 pm Saturday 10 am–3 pm Sunday Closed
Urban Estates (no. 20)	E(c)(ii)	Monday 9 am–5 pm Tuesday 9 am–5 pm Wednesday 9 am–5 pm Thursday 9 am–5 pm Friday 9 am–3 pm Saturday 9 am–1 pm Sunday Closed
Application site (nos. 21-24) (proposed)	E(b)	Monday-Friday 7am-7pm Saturday 9am-10pm Sunday 9am-6pm
Wards (nos. 25-26)	E(c)(ii)	Monday 9 am–5:30 pm Tuesday 9 am–5:30 pm Wednesday 9 am–5:30 pm Thursday 9 am–5:30 pm Friday 9 am–5:30 pm Saturday 9 am–5 pm Sunday Closed
Paro Tuition (nos. 27-28)	F1 (a)	Monday: 10:30 AM – 8:00 PM Thursday: 9:00 AM – 7:30 PM Friday: 10:30 AM – 7:00 PM Saturday: 9:30 AM – 1:30 PM Sunday: Closed
Mansion (no. 29)	E(c)(ii)	Monday to Friday: 9:00 AM – 6:00 PM Saturday & Sunday: 11:00 AM – 4:00 PM
Aggarwal accountants (no.	E(c)(i)	Monday 9 am–5:30 pm

30)		Tuesday 9 am–5:30 pm Wednesday 9 am–5:30 pm Thursday 9 am–5:30 pm Friday 9 am–5:30 pm Saturday Closed Sunday Closed
Invicta Bar (no. 31)	Sui Generis (p)	Monday Closed Tuesday 11 am–12 am Wednesday 11 am–12 am Thursday 11 am–12 am Friday 11 am–1:30 am Saturday 11 am–1:30 am Sunday 11 am–12 am
Alto Gusto (no. 32)	E(b)	Monday 12–10 pm Tuesday Closed Wednesday 12–10 pm Thursday 12–10 pm Friday 12 pm–12 am Saturday 12 pm–12 am Sunday 12–8 pm
China Garden (no. 33)	E(b)	Monday 12–2 pm, 5–10 pm Tuesday 12–2 pm, 5–10 pm Wednesday 12–2 pm, 5–10 pm Thursday 12–2 pm, 5–10 pm Friday 12–2 pm, 5–11:30 pm Saturday 12–2 pm, 5–11:30 pm Sunday 1–10 pm
Ambient (no. 34)	E(b)	Monday 5:30–10 pm Tuesday 5:30–10 pm Wednesday Closed Thursday Closed Friday 5:30–10 pm Saturday 5:30–11 pm Sunday 12:30–10 pm
Geoffrey Simmons Insurance Consultants (nos. 35-36)	E(c)(i)	Monday to Friday: 08:30 AM – 05:30 PM Saturday: 09:00 AM – 01:00 PM Sunday: Closed

The surrounding area is characterised by a varied mix of town centre uses. Although food and drink premises are present nearby, they are not concentrated to the extent that would amount to over-clustering. The proposed use would therefore sit comfortably within the existing pattern of development and would not harm the character or function of the town centre.

Overall, it is considered that the proposed development would be an appropriate use in the town centre and would not harm the retail function of Gravesend. As such, the proposal would be acceptable in principle and be broadly in line with Policies CS05 and CS08 of the Gravesham Local Plan Core Strategy (2014) and Saved Policy S6 of the Gravesham Local Plan First Review (1994).

The proposal would also be in line with the first criteria of Saved Policy S7 of the Gravesham Local Plan First Review (1994). The following paragraphs will assess the detailed impacts of the proposal, in line with the rest of the Saved Policy S7 criteria.

The principle of a café use in the town centre is acceptable and therefore the application needs to be assessed against the policies below.

Design, Character and Appearance

Upper Windmill Street Conservation Area

As stated above, the application site is located within the Windmill Street Conservation Area where development should preserve or enhance the area's special architectural and historic character. The row of shops 15-20 Windmill Street are some of the earliest shops in the row which would have been houses originally with gardens to the front. The application site is attached to this row of buildings. The two storey buildings form a terrace of single-bay structures; the rhythm of the bays has been lost at ground floor level with the introduction of modern shopfronts, some of which span across more than one bay, but is retained at first floor level, where some original multi-paned sash windows survive. Negative features of the Conservation Area include modern shopfronts and signage which is not of a design that reflects or enhances the historic building on which it is inserted.

Policy CS19 of the Gravesham Core Strategy 2014 states that new development will be visually attractive, fit for purpose and locally distinctive. It will conserve and enhance the character of the local built, historic and natural environment, integrate well with the surrounding local area and meet anti-crime standards.

Policy CS20 states that the Council will accord a high priority towards the preservation, protection and enhancement of its heritage and historic environment as a non-renewable resource, central to the regeneration of the area and the reinforcement of sense of place. Proposals and initiatives will be supported which preserve and, where appropriate, enhance the significance of the Borough's heritage assets, their setting where it contributes to the significance of the asset and their interpretation and enjoyment, especially where these contribute to the distinct identity of the Borough.

Policy TC9 of the Gravesham Local Plan 1994 states:

The Borough Council will resist developments which would result in:-

- (i) Existing Shopfronts of traditional design and materials being lost.
- (ii) The installation of security grills and shutters on the exterior of Shopfronts.

The application relates to the change of use from shop to café, new shopfront and new paint colour. The paint colour for the front of the building is to be RAL1013 or 9001 (oyster white). The shop front pilasters, corbels, stallrisers, fascia and cornice are to be RAL7021 which is acceptable. The signage colour is to be RAL9001 (cream) with dark lettering (RAL7021). This is characteristic of the traditional palette generally associated with historic buildings and shopfronts within conservation areas where lighter and more muted colours are typically employed to complement architectural detailing and maintain visual harmony. The proposed building, signage and shopfront colours are considered to preserve and enhance the character and appearance of the conservation area consistent with the objectives of local and national heritage

policy.

The proposed replacement shopfront and painting of the building are considered to comply with Policies CS19 and CS20 of the Gravesham Core Strategy 2014, policies TC3 and TC9 of the Gravesham Local Plan 1994 and paragraph 135 and Section 16 of the National Planning Policy Framework 2024.

No security grilles are being proposed and an informative is recommended to advise that, if these were to be installed at a later date, these would need planning permission.

Amenity

The proposed shopfront and external alterations will have no detrimental impact on the amenities of neighbouring properties in terms of loss of outlook, privacy, sunlight or daylight.

The proposed change of use has the potential to impact amenity in terms of noise, disturbance and odour.

Insufficient information has been provided in relation to odour and therefore a condition is recommended that a scheme for odour and noise shall be submitted to and approved by the local planning authority prior to any works commencing.

No details have been provided in relation to waste however there is ample storage to the rear and therefore a condition is recommended to ensure details of waste storage and collection are provided prior to the bringing into use of the property.

The table above shows that the proposed opening hours are similar to other businesses in the row of properties. There are no residential units above the site and no objection is raised to the proposed use.

Overall, it is considered that, subject to conditions, the proposed development would have no significant adverse impacts on the residential amenity of surrounding occupiers and would be in line with Policy CS19 of the Gravesham Local Plan Core Strategy (2014), Saved Policy S7 of the Gravesham Local Plan First Review (1994) and paragraph 135f of the National Planning Policy Framework 2024.

Ecology and Biodiversity

Biodiversity Net Gain

Biodiversity net gain (BNG) is a way of creating and improving natural habitats. BNG makes sure development has a measurably positive impact ('net gain') on biodiversity, compared to what was there before development.

In England, BNG is mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Developers must deliver a BNG of 10%. This means a development will result in more or better quality natural habitat than there was before development.

As this application does not involve any loss of habitat, BNG is not applicable.

Parking and Highways

Paragraph 115(b) of the NPPF 2024 requires new development to ensure that safe and suitable access can be achieved for all users and paragraph 115(d) requires any significant impacts on the transport network or on highway safety to be cost effectively mitigated to an acceptable degree. Paragraph 116 sets out that development should only be refused on highways grounds if there would be an unacceptable impact on highway safety.

Policy CS11 of the Gravesham Local Plan Core Strategy (2014) requires new development to mitigate its

impact on the highway and public transport networks and to provide sufficient parking in accordance with adopted parking standards.

Saved Policy P3 of the Gravesham Local Plan Core Strategy (2014) requires development to make provision for vehicle parking in accordance with adopted parking standards unless justified as an exception and states that parking provision should normally be provided on the development site.

Saved Policy S7 of the Gravesham Local Plan First Review (1994) seeks to ensure that hot food shops are located where there is sufficient car parking available to ensure that the proposal will not harm highway safety.

The site benefits from a highly accessible town centre location with nearby public car parking facilities, including Parrock Street Car Park. Any uplift in vehicle movements would be modest in scale and would not result in unacceptable parking or highway safety impacts. Given the town centre location of this site adequate parking provision is available.

Adequate vehicle parking provision is therefore available in accordance with paragraphs 109 to 114 of the National Planning Policy Framework (2024), Saved Policies T1 and P3 of the Local Plan First Review (1994) and Policies CS11 and CS19 of the Core Strategy 2014 subject to further details of cycle parking provision.

Conclusion

The proposed change of use and shop front alterations will have no detrimental impact on the character and appearance of the conservation area, amenity, parking or highway safety and therefore accords with the abovementioned policies and is recommended for approval.

Recommendation:

Permit

(For detailed conditions / reasons for refusal and informatives, see draft Decision)

Case Officer:	Mrs Alison Webster	Team Leader:	Richard Hart
Signed:		Signed:	<i>R Hart</i>
Dated:	16 June 2026	Dated:	16th June 2026