

Design and Access Statement incorporating Planning and Heritage Statements.



Conversion of Bows Pavilion to Café Bakery

Site: Bows Pavilion, Windmill Gardens, Clarence Place, Gravesend, DA12 1LB

Applicant: Basement Bakehouse Ltd

1 Introduction

This statement is in support of an application for alterations to an existing bowls pavilion and to erect external decking along with internal alterations and new bi-fold doors to convert the existing vacant sports pavilion to a local café bakery.

Since the previous use as a sports pavilion and the proposed use as a bakery and café fall under **Class F2 (Local Community Uses)** as defined under the Use Classes Order 2025, there is no change of use in planning terms.

The proposal aims to bring the currently unused building back into active use by establishing a small neighbourhood café serving baked goods, coffee and light food. The development would involve internal alterations to accommodate café

seating, a service counter and food preparation area, together with modest external changes including a decked seating area and accessible ramp.

The building would not be extended and the existing timber structure would be retained and sympathetically refurbished including a new set of bi-fold doors to connect the external deck seating area to the café interior.

The café / bakery would be operated by the applicant.

2 The Applicant.

Basement Bakehouse is a small independent micro-bakery based in the Windmill Hill area of Gravesend. The business produces handmade sourdough bread, cinnamon buns, cookies and seasonal baked goods and has developed a growing local customer base.

The business currently operates a weekend bakery service and has developed a growing local customer base.

In response to increasing demand, the bakery began operating temporary pop-up retail activity within Windmill Gardens pavilion alongside a small coffee trailer which has been serving park visitors since October 2025. The bakery continues to produce its baked goods for sale in these temporary facilities at its current location nearby in Constitution Hill.

These temporary arrangements have demonstrated the suitability of the location for a small café use and is supported by growing strong local demand for a permanent facility.

The proposed café bakery would consolidate these existing temporary operations into a single permanent location within the pavilion. The development would therefore replace temporary structures with a well-designed and appropriately managed facility that better integrates with the character of the park and the surrounding conservation area

3 Proposed Use

The proposed development would create a **small café bakery** serving:

- baked goods produced by Basement Bakehouse
- speciality coffee
- light food options

The business will combine the existing coffee trailer operation and bakery retail activity into a single location within the pavilion.

The pavilion will therefore provide a permanent, well-designed facility replacing temporary arrangements currently in place within the park.

The site would be in use all week and operate daytime retail hours with some early hour kitchen time.

The business also proposes occasional events which extend to early evening.

List of food items likely to be prepared fresh on site:

- Sourdough bread
- Sweet rolls (e.g. cinnamon rolls, lemon buns etc)
- Cookies
- Brownies
- Sandwiches
- Salads
- Stromboli/Pizza
- Pastries
- Cakes
- Coffee/Tea

4 The Site

The pavilion is located within Windmill Gardens, an urban park set within the Windmill Hill Conservation Area.

The pavilion is a small, detached timber structure dating from early 1900's that historically served as a changing room and clubhouse facility, latterly for the Belle Vue and Windmill Bowls Clubs. Both clubs ceased operating in 2020 and the building has remained vacant for several years since without prospect of re-opening as a sports pavilion.

The pavilion is cited within the CACA as not of specific merit. However, it has some general value and contributes as an example of a park sports pavilion of its period and in the historic context of the park.



View of the Proposal Site From West Within the Park

The Windmill Tavern lies immediately to the NE of the pavilion at the lower end of Shrubbery Road and there remains a garden entrance to the pub garden immediately adjacent to the pavilion.

This pub was constructed in 1789 and is notable for the side chimney stacks and its mansard roof although is not listed.



It does serve as a footfall generator to the potential benefit of the proposed bakery as a complimentary use and in making pedestrians arriving via the park mutually aware of each other.

6 Proposal

The existing building would be refurbished to maintain and preserve the character and appearance of the “pavilion” and would not be extended.

Alterations would involve: (see plans submitted with this application)

- Internal reconfiguration and refit to café use provision of limited outdoor seating on new timber decking.
- installation of accessible entrance ramp and steps
- New timber full height screen / doors onto the deck area.

- External storage shed with associated boundary fence and gate
- A compact HVAC system
- External sign post advertising the café
- External lighting to the decking area and illuminating signage

6.1 The existing interior would be stripped out and the new interior would be split into two parts, internal public seating and an open baking kitchen. The bakery kitchen incorporating seating for customers and an open bakery area

A schedule of the proposed bakery equipment is included on the drawings. Notable equipment which **will NOT be used**:

- Fryers
- Commercial bread deck ovens
- Gas hob
- Gas boiler

6.2 A non-slip timber external deck is proposed to the NW and NE elevations, with associated steps and an accessible ramp which would provide external customer seating and improved access to the pavilion bakery. The deck, ramp and steps would have black steel perimeter balustrades.

New twin bi-fold fully glazed screen doors are proposed to the NW elevation that would open either partially or fully onto the deck seating area to achieve a convenient public entry to the bakery from entrance steps and to provide an open connection between interior and exterior seating areas.

6.3 For storage of stock materials and equipment associated with the bakery, an off the shelf Keter Darwin - 8x6 ft Apex 2 door Shed is proposed, coloured brown to blend with the wood stain finish of the pavilion. The shed would be sited discretely – centrally at the rear of the pavilion between it and the pub boundary to the SW. A ship-lap vertical timber garden fence with matching gate would be erected along the short boundary between the SE corner of the pavilion and the pub boundary finished in brown woodstain.

6.4 The proposed bakery kitchen does not require full commercial kitchen extraction equipment like a commercial kitchen would, due to a complete absence of frying or stove top cooking.

It would only have two bread ovens that are of an "artisan" nature, more akin to domestic ovens than large scale commercial or industrial set ups, and no other cooking equipment.

Steam from the proposed bread ovens can be easily processed using a basic air recirculation system which does not generate significant operational noise levels .

Therefore, the proposed system should not require a noise survey.

The following equipment is proposed to serve the interior ventilation requirements for the seating and open bakery areas together:-

Proposed interior air handling equipment comprising ;

1 x Mitsubishi Electric LGH.80.RVX.80 hot recovery unit located below the internal structural roof apex - with ducted delivery and extract coupled to an intake grille under the apex of one gable end elevation and exhaust grille on the other gable end elevation.

1 x Daikin – Sky air Alpha Series wall mounted interior cooling unit FAA/71.A coupled with the below outdoor condenser

Proposed Outdoor unit ;

1 x Daikin RZAG71NV1 condenser unit located at low level in the rear compound close to the storage shed.

Technical details of the proposed system equipment are submitted within the application documents.

6.5 A post-and panel sign is proposed to advertise the café bakery. It is proposed to place the sign near the perimeter of the bakery site next to the pathway and steps leading up to its proposed deck area, and facing downhill into the centre of the park.

Details are included in the submission drawings.

6.6 Some fixed lighting is proposed on the NW and NE elevations using downlighting to wash the walls and illuminate the deck surface. As such there will be minimal outward glare.

7 Heritage Matters / Statement

Today, the Windmill Hill is one of Gravesham's designated conservation areas and as such is a Heritage Asset.

Section 16 of the NPPF, Policy CS20 of the Core Strategy, Saved Policy TC3 of the Gravesham Local Plan First Review and the Windmill Conservation Area Character Appraisal are relevant.

These policies highlight the desirability of sustaining and enhancing the significance of heritage assets and the desirability of new development making a positive contribution to local character and distinctiveness.

Policy CS20 of the Core Strategy sets out that the Council will accord high priority towards the preservation, protection and enhancement of its heritage and historic environment. It states that proposals which preserve and, where appropriate, enhance the significance and setting of heritage assets will be supported.

Policy TC3 of the Gravesham Local Plan First Review also advises that development will be carefully judged for its impact on the conservation area and be expected to make a positive contribution to the conservation area.

The Windmill Hill Conservation Area Character Appraisal is also a material planning consideration. It is noted that it does not identify this building as a “positive building” in the conservation area.

Windmill Gardens is a central feature of the CA and the former sports pavilion is located centrally within that overlooking the retained tennis courts, and war memorial beyond.

Windmill Hill is a prominent historic site rising 55 meters above the Thames to its north. It has served as a strategic royal lookout, a vital Thames beacon, and a bustling Victorian pleasure ground.



The Beacon at the top of Windmill Hill

General Description

The boundary of the Windmill Hill Conservation Area runs along the centre of Parrock Road, Leith Park Road and Windmill Street. It includes all properties in Clarence Place, 70-90 Parrock Street, 13-16 William Street, 2 Parrock Road and all properties in Christ Church Crescent and Road.

There are 14 listed buildings – all Grade II, three of which are in relatively close proximity ;

- The war memorial within the park is close by and
- Homestead (30 & 31 Clarence Place) at the foot of Shrubbery Lane a few doors
- South Hill Bank Club at 1 Parrock Street opposite corner from Homestead at the foot of Shrubbery Lane



History

Much of the area's development may be traced back to early Victorian times when Windmill Hill was a popular tourist attraction, at the height of Gravesend's popularity as a resort, for the thousands of holidaymakers who arrived from London by steamboat.



Hill Side Terrace – Shrubbery Road beyond downhill

Character

Although most of those tourists abandoned Gravesend for other resorts further afield when the railway was extended, particularly the North Kent Line which opened in

1849, much of the area is still in leisure use, either as informal open space or more formally laid out gardens.

The hill's topography has resulted in some interesting and intricate patterns of townscape, involving changes of level; steeply sloping roads with framed glimpses out over the surrounding area; grand villas elevated above the road, exploiting the views around the edges of the Conservation Area and culminating in spectacular views over the town and beyond from the summit. The area contains many fine buildings of which Clarence Place probably has the greatest concentration.



View of Constitution Crescent from Windmill Hill. Grade II Listed

Constitution Crescent in South Hill Road is a listed terrace nearby. An incomplete classical terrace, it dominates the skyline for miles around. At close quarters this group is even more dominant, particularly when viewed against the neat rows of artisans' cottages nearby, which have their own innate charm and contribute just as much to the character and appearance of the area as the grander, more ornate villas.

Shrubbery Road, one of the oldest roads on the hill, contains a fine collection of different architectural styles and periods and includes The Windmill Tavern which abuts the proposal site on its NE boundary.

Historic milestones and important features for Windmill Hill ;

- 1377: Originally known as "Rouge Hill," the site was instituted as a defensive royal beacon by King Richard II at the summit and a high-ground watchpoint that signalled warnings during the Spanish Armada.

- 1606: King James I, Christian IV of Denmark, and Prince Henry gathered on the hill to watch naval cannon salutes on the river.
- 18th Century: The first windmill was erected on the summit during the Elizabethan era. It was destroyed by a gale in 1763 but rebuilt in 1764.
- Victorian Heyday: In the 1840s, the hill was developed into a pleasure ground for Londoners arriving by steamboat.
- 19th Century: Windmill Hill was a huge draw for Londoners arriving by steamboat. The last working windmill (which featured a camera obscura) became a prime tourist attraction before it was dismantled in 1894 for safety reasons following a fire to the adjacent mill house.
- 20th Century: The gardens contain a Grade II listed war memorial commemorating the losses of both World Wars, featuring a striking winged-victory statue unveiled in 1922.
- The hill itself also features marked areas where a Zeppelin dropped bombs during WWI.

Windmill Gardens (nestled at the foot of Windmill Hill) is significant within Gravesend as a key historical focal point and an active local community leisure hub.



Photograph (Postcard) of the Proposal Property Pavillion and Bowling Green (early 20C)

The proposed recycling of the pavilion as a community café and local artisan bakery will directly act to preserve this tired historic structure, revitalise its community significance and promote public use of the gardens.

This new development will thus restore a lost focal point in the community and enhance the conservation area with a new lease of life that is naturally complimentary to the existing tennis sports activity and public use of the gardens.

8 Planning Policies and Considerations

8.1 Heritage Policies

See Section 7 above relative to Heritage Policies and issues.

8.2 Potential Impacts on residential amenity

- Paragraph 135 of the NPPF
- Policy CS19 of the Core Strategy

These policies require new development to be located, designed and constructed to safeguard the amenity, including privacy, daylight and sunlight, of its occupants and those of neighbouring properties and land".

Loss of privacy/sunlight/daylight/outlook

There is a significant separation distance of in excess of 30m between the existing building and the nearest residential dwelling which are located on Shrubbery Road to the south and in excess of 40m to the east.

The new windows and the new decking face northwards and north-eastwards and would not impact the residential amenity of the occupiers of these properties.

Furthermore, given that the proposal would not result in the extension of the existing building, it is unlikely that there would be any additional impacts on the amenity of nearby residents in terms of loss of sunlight/daylight or outlook.

Noise and odour

The proposal includes a baker's kitchen using two domestic style / scale bread ovens (as kitchen equipment schedule below), which do not produce significant emanating or significant odours or noise over and above that of residential kitchens and would not require a specific or targeted kitchen extract system – i.e. no canopy, grease filtration and odour control equipment or specialised maintenance regime.

A small heating and cooling ventilation system is proposed and the manufacturer's information is appended. This is no different to some residential and to small commercial premises and would not result in noise disturbance to the occupiers of nearby properties or the surrounding area.

8.3 Highway issues

- Policy CS11 of the Core Strategy
- Saved Policy P3 of the Gravesham Local Plan First Review

These policies seek to ensure that new development mitigates its impact on the highway and that sufficient parking is provided - reflecting the availability of public transport provision and the accessibility of local services and facilities.

The council has acknowledged that it would not be possible to provide additional on-site parking due to the location of the site and that it is likely that a very strong case could be made for a nil level of additional parking based on the location of the building within a local public park where most customers would walk to rather than make a specific journey by car.

It seems likely that parking pressures from the previous use as a bowls facility would be more intense than for the proposed use.

8.4 Biodiversity net gain

- Article 7 of The Town and Country Planning (Development Management Procedure) (England) Order 2015:

Biodiversity net gain is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021).

However, the government has announced that it is bringing into force an amendment that increases the extent of new coverage on a small development site (such as the proposal site) for exemption on a de minimus basis to apply.

The government announce that this rule change is to apply from July 2026 and is intended to protect minor developments from disproportionate financial impacts relative to compulsory biodiversity improvements.

It is clear that the proposal would fall under the new threshold. However, given the current legislation and submission checklist requirements for planning applications, a BNG assessment has been included in the submission documents but it is contended that the imminent emerging policy change should be given significant weight in this instance and biodiversity impacts should be regarded as de minimus and the development on this site should be exempt from biodiversity net gains.

8.5 Other Planning Matters

This proposal follows consultations with both Planning and Leisure, Arts & Culture departments at Gravesham Borough Council.

A Pre-Application Enquiry was submitted in spring last year and the Council's response issued on 29 September 2025 (Reference: **PRE20250099**) advised in summary ;

“ Subject to the loss of the pavilion as a “sports facility being justified in terms of paragraph 104 of the NPPF and Policy CS13 of the Core Strategy, it is likely that the Council would be able to support the principle of the proposed use. Furthermore, there is no objection to the proposed changes to the elevations of the building and provision of a decked area and ramp, subject to appropriate details being submitted at the planning application stage. “

Loss of Sports Facility

Paragraph 104 of the NPPF advises that developing non sports related uses on existing open space, sports and recreational buildings and land, including playing fields and formal play spaces, should be resisted other than where such open space, buildings or land is now surplus to requirements and unless the development is for alternative sports or recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

Policy CS13 of the Core Strategy also refers to “sports facilities” and states the following: The Council will seek to make adequate provision for and to protect and enhance the quantity, quality and accessibility of green space, playing pitches and other sports facilities, in accordance with an adequate, up to date and relevant evidence base.

The Bowls Pavilion historically supported the Belle Vue and Windmill Lawn Bowls Clubs both of whom ceased operating in 2020, and the building has remained unused since that time.

The GRFC Lawn Bowls Club at Ronald Biggs Drive also closed permanently in 2020 and has been re-allocated to develop retirement homes in due course.

Absence of active clubs or bowling activity interest associated with either of these sites on council land and in particular, absence of interest on the proposal site for over six years indicates that the building is currently surplus to the needs of organised bowls facilities.

Clearly, the building has been vacant since 2020 due to both occupying clubs closing as part of a general trend in Gravesend where other bowling facilities have died away.

The pavilion is therefore now “surplus to requirements” and has no obvious opportunity for its re-use as a sports facility making such use no longer feasible, and is in a situation of decay and progressive dilapidation. Consequently, this central element of an important historic pleasure garden in a conservation area is in need of redress and the proposed community bakery / café would reverse this situation.

The proposed re-use would also positively support and promote the use of the nearby tennis courts by providing refreshment facilities and could be expected to reinforce and sustain this sports activity in Windmill Gardens.

The proposed bakery-café in any case falls under **Class F2 (Local Community Uses)** as defined under the Use Classes Order 2025, there is thus no change of use in planning terms.

Demand for the Proposal

The proposed development responds to clear local demand for a small neighbourhood café serving Windmill Gardens and the surrounding residential area.

The current pop-up coffee trailer operation and bakery pop-up have demonstrated strong local support and enjoy regular and growing customer use.

These temporary arrangements indicate that the site is well suited to a small-scale hospitality use, to serve park visitors and the local community.

The pavilion conversion would formalise and improve this provision through the creation of a permanent, well-designed facility

9 Conclusion

The proposal will help to revitalise and promote community use of the gardens following the loss of existing use of the pavilion by two bowls clubs. The proposed café would provide a complementary facility supporting the recreational use of Windmill Gardens, including the existing tennis courts and general park activity.

The proposal has been designed to have minimal impact on the established environment by re-use of the existing building with only minor alterations and appropriately scaled additional decking,

The proposals employ both restoration and replication of the current materials and finishes, preserve the character of the existing building and will enhance the character of the park and wider conservation area.

Overall, the proposal represents a sensitive reuse of an existing vacant building within a sustainable urban location. By providing a small-scale café facility serving park users and the surrounding neighbourhood, the development will provide local employment and contribute positively to the social vitality of Windmill Gardens while preserving the character of the existing structure and its conservation area setting.