



Delegated Report

Advertisement Consent

Planning Application No: 20260704

Location: Former Bowls Club Windmill Gardens Clarence Place Gravesend

Description: Advertisement consent; Free standing back-illuminated rectangular flat metal panel supported between two timber posts

Applicant: Mrs Andrea Smith

Site Visit Date: Desktop Assessment

Submitted Documents/Plans

Planning Application Form;
Drawing No. 26-031-DW-002 – Existing Site Plan;
Drawing No. 26-031-DW-003 – Existing Site Plan Tree Removal;
Drawing No. 26-031-DW-004 – Proposed Site Plan;
Drawing No. 26-031-DW-100 – Existing Floor Plan;
Drawing No. 26-031-DW-101 – Proposed Floor Plan;
Drawing No. 26-031-DW-200 – Existing Elevations;
Drawing No. 26-031-DW-201 – Proposed Elevations;
Drawing No. 26-031-DW-400 – Proposed Front Signage;
Supporting Information – Tree Report;
Supporting Information – Tree Survey Report (Aureus Tree Services Ltd – 22/04/2026);
Supporting Information – Daiken Alpha Domestic Cooling Data;
Supporting Information – Ecology BNG Report (Ref. 1822);
Supporting Information – Tree Constraints Plan;
Supporting Information – Appendix C: Photos of Trees;
Supporting Information – Ventilation Product Information;
Supporting Information – Drawing Schedule & Issue Record;
Supporting Information – Design and Access Statement inc. Planning and Heritage Statements

Relevant Planning History

Reference	Description	Decision	Decision Date
20260703	Conversion of existing building into a bakery and coffee shop with associated external deck seating area, air con unit and storage shed.	Pending Consideration	

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS11 – Transport
- CS19 – Development & Design Principles

- CS20 – Heritage and the Historic Environment

Gravesham Local Plan: First Review (1994)

- TC3 – Development Affecting Conservation Areas
- TC8 – Advertisement Consent

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 3 – Advertisement Control policy Guidelines (2020)
- Windmill Hill Conservation Area Appraisal (2009)

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

Analysis

Paragraph 141 of the NPPF (2024) sets out that poorly sited and designed advertisements can have a negative impact on the quality and character of an area and that advertisements should be subject only to control in the interests of amenity and public safety, taking account of cumulative impacts.

The local interpretation of this policy approach is set out in Saved Policy TC8 of the Gravesham Local Plan First Review. This policy sets out that applications for advertisement consent will be determined with reference to the adopted policy guidelines for advertisement control and that if displays are detrimental to public safety or to amenity, they will be resisted.

As such the main issues in the determination of this application are whether it is acceptable in principle to have illuminated advertisements at the application site, which is also located within the Windmill Hill Conservation Area, and if so whether the proposed advertisements would be appropriate in public safety, amenity terms and highway safety.

Amenity

The application site is located within the urban area within the Windmill Gardens where the principle of development is acceptable. It is also located within the Windmill Hill Conservation Area.

Policy CS19 states 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 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.

There is no particular reference to the building in the Conservation Area Appraisal however it is stated within the Appraisal that the tennis courts and bowling green have a direct visual correlation to Clarence Place. With regard to signage, the Appraisal states that *Windmill Hill Gardens contain a neat arrangement of cast iron and timber benches grouped around the War Memorial. Black painted slatted litter bins are located close to some of the benches.* It does not specifically refer to signage.

Overall, the Borough Council is very concerned to ensure that the environment generally is improved by achieving a good standard of design in new development and is aware that commercial requirements have to be balanced against the need to protect the amenity of the area.

Policy 4 of the Advertisement Control Guidelines states that Advertisement displays in other parts of the urban area of Gravesend and Northfleet will generally be acceptable on business premises, if they relate to the trade or activity carried on in the premises. Other advertisements will be considered on their individual merits and may be acceptable if they are viewed against a commercial background and, in the case of illuminated advertisements, are adequately screened from residential property.

The proposed sign is simple and of a scale in keeping with the size of the associated building and would not detract from the Windmill Gardens.

The level of illumination will not drastically change and is appropriate for the type of business at the site.

Policy 5 states that In or adjoining conservation areas and on listed buildings, or in a position which would affect the setting of a listed building, the protection of amenity will be the paramount consideration. Advertisements should harmonise with the architectural features of any building on which they are displayed and not otherwise detract from the appearance of the conservation area or listed building.

Policy 7 states that *advertisement displays will be expected to comply with the following criteria – they*

should be sympathetic to the appearance of the building or land on which they are displayed and should not be an over-intrusive feature in the street-scene or locality; they should not cause or add to an impression of clutter on a building or other land.

The proposed plans show signs that are sympathetic to the associated building and the land upon which it is to be located. It will not detract from the character of the Windmill Gardens.

There are no residential properties in close proximity to the building and the level of illumination complies with the Institution of Lighting Professionals, Professional Lighting Guide 05; therefore no objections are raised.

Public Safety

Policy 8 states that advertisements should not obstruct visibility, interfere with the interpretation of road signs or traffic signals, or distract the attention of drivers. The signage would not be located within close proximity to a road and therefore no objections.

Conclusion

The proposed sign is modest in scale, measuring 1.0m by 0.5m, and would be positioned at a low height. The use of timber posts and a weathering steel panel provides a simple and high-quality design that reflects the landscaped and historic character of Windmill Gardens. Whilst the sign would be illuminated, the illumination is limited to the laser-cut lettering rather than the entire panel, reducing its visual prominence. Given its scale, design and materials, the proposal would not appear unduly intrusive or result in harm to the character, appearance or significance of the Windmill Hill Conservation Area. The proposal is therefore considered consistent with the objectives of the NPPF in respect of amenity and heritage conservation.

The development would accord with Policies CS19 and CS20 of the Gravesham Local Plan Core Strategy 2014), Saved Policies TC3 and TC8 of the Gravesham Local Plan First Review (1994), the Advertisement Control Policy Guidelines (2020) and Paragraph 141 of the National Planning Policy Framework (2024).

Recommendation:

Permit

(For detailed conditions and informatives, see draft Decision)

Case Officer:	Ms Amanda Cue	Team Leader:	Richard Hart
Signed:	A Cue	Signed:	R Hart
Dated:	7 th August 2026	Dated:	10 th August 2026