



Delegated Report

Planning Application

Planning Application No: 20251052

Location: 12 Windmill Street Gravesend Kent DA12 1AD

Description: Change of use from financial services to sale of food and drink.

Applicant: Krysia Pardela-Stachera

Site Visit Date: 30th October 2025

Submitted Documents/Plans

Application Form

01 – Plans and Elevations as Existing

02A – Plans and Elevations as Proposed

03 – Site Location Plan

04 – Block Plans as Existing and Proposed

Planning and Heritage Statement

Article 13 Notice

Cover Letter

Cheftop Details

Catering and Refuse Storage Details

Superseded Plans:

~~02 – Plans and Elevations as Proposed~~

Relevant Planning History

Reference	Description	Decision	Decision Date
19850688	Change of use from Travel Agency to a Building Society Branch Office	Permitted	11.11.1985
19830360	Erection of two storey rear extension to form stair well enclosure and change of use of 1st floor from residential to office	Permitted	24.06.1983

Development Plan

Gravesham Local Plan Core Strategy (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 Historic Environment

Gravesham Local Plan: First Review (1994)

- 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

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 12 – Achieving Well-Designed Places
- Section 15 - Conserving and enhancing the natural environment
- Section 16 - Conserving and enhancing the historic environment

Supplementary Planning Guidance

- SPG 4 – KCC Parking Standards (2006)
- Design for Gravesham – Design Code (2024)
- King Steet Conservation Area Appraisal (2009)
- Gravesham Town Centre Conservation Areas Management Plan (2009)
- SPG 4 - Shopfront and Commercial Premises (2020)

Consultations, Publicity and Representations

Consultees

Ward Councillors

No comments received.

GBC Conservation Officer

No comments received.

GBC Waste and Refuse

I have reviewed this planning application, and I am happy with the proposed refuse & recycling storage details.

To confirm, the new owner will procure an external waste collection company to undertake their waste collection, although the Council can offer this service.

GBC Environmental Protection

The Planning Statement refers to a previous permission under 20211064. However, this relates to 22A High

Street. I can't find a previous permission for a CoU to the sale of food and drink at this address? The planning statement also states that the 'equipment will not require the installation of a kitchen extract system. Unless this statement can be justified with additional information, the following conditions are advised (particularly as a dwelling is attached on Manor Road).

There is no information regarding storage and disposal of refuse storage. Information on this will also be needed.

The proposed opening hours are acceptable.

Restaurant/Takeaway 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 Regulatory Services

No objection in principle. The following comments are made for the information of the applicant.

Health and Safety

In these premises Gravesham Borough Council (GBC) Environmental Health will be the enforcing authority. The applicant must ensure that these premises comply fully with the Health and Safety at Work (etc) Act 1974 and all relevant regulations made there under. For information and advice on health and safety matters check out the HSE website www.hse.gov.uk or contact the Environmental Health team on commercialhealth.admin@gravesham.gov.uk

This workplace will be immediately subject to the requirements of the Workplace (Health, Safety and Welfare) Regulations 1992. Particular attention should be made to the following requirements.

- Regulation 6 requires that effective and suitable provision shall be made to ensure that every enclosed workplace is ventilated by a sufficient quantity of fresh or purified air.
- Regulation 14 requires that every window or other transparent or translucent surface in a door or gate shall where necessary for reasons of safety be constructed of a safety material or be protected against breakage and also be appropriately marked.
- Regulation 20 requires that suitable and sufficient sanitary conveniences shall be provided at readily accessible places. Where between 6 and 25 persons are employed a minimum of 2 water closets must be provided.

Food Safety Comments

I am unable to fully comment on the structure of the kitchen as the plans do not provide me with a detailed layout.

It is a requirement under Article 6(2) of Assimilated Regulation 852/2004 that food business operators must register their establishments with the appropriate competent authority (in this case GBC Environmental Health) at least 28 days before food operations commence.

Registration is via the Gravesham Borough Council website www.gravesham.gov.uk/food-safety

The applicant must ensure that the kitchen fully complies with current food safety legislation to the satisfaction of the Regulatory Services Manager. Structural and operational requirements are covered by the legislation notably Assimilated EC Regulation 852/2004.

All internal structures to the kitchen must be impervious, non-absorbent and washable i.e. easy to clean and maintain in a clean condition.

The provision and location of sinks and wash hand basins is an important consideration in the design and planning of a kitchen. A minimum of 1 wash hand basin and a double sink unit must be installed. A dish washer is also recommended.

For further advice on starting a food business please visit the FSA website

<https://www.food.gov.uk/business-guidance>

Kent Police Designing Out Crime Team

We have reviewed this application in regard to Crime Prevention Through Environmental Design (CPTED) and in accordance with the National Planning Policy Framework (NPPF).

Applicants/agents should consult us as Designing out Crime Officers (DOCO's) to address CPTED and incorporate Secured By Design (SBD) as appropriate. We use details of the site, relevant crime levels/type and intelligence information to help design out the opportunity for Crime, Fear of Crime, Anti-Social Behaviour (ASB), Nuisance and Conflict.

There is a carbon cost for crime and new developments give an opportunity to address it. Using CPTED along with attaining an SBD award using SBD guidance, policies and academic research would be evidence of the applicants' efforts to design out the opportunity for crime.

We recommend SBD guidance is utilised to address designing out crime to show a clear audit trail for Designing Out Crime, Crime Prevention and Community Safety and to meet our Local Authority statutory duties under Section 17 of the Crime and Disorder Act 1998. The points below identify my recommendations for the layout and design of this scheme.

1. CCTV is advised for all areas, especially at entry points, till areas, and other areas with limited natural surveillance or storage areas containing high-value equipment. Please ensure the CCTV supports the lighting plan.
2. We strongly recommend alarms, with an auto-dial function, be installed on all external doors, including emergency exits.
3. If new external doorsets are proposed (a doorset is the door, fabrication, hinges, frame, installation, and locks) we recommend these to meet PAS 24: 2022 UKAS certified standard, STS 201 (certified to PAS 24:2022) or LPS 2081 Issue 1 Security Rating B+. Please note PAS 24 is a minimum-security standard, and communal doors may require a higher standard, such as STS or LPS.
4. If new windows are proposed on the ground floor, we recommend these to meet PAS 24: 2022 UKAS certified standard, STS 204 (certified to PAS 24:2022) or LPS 2081 Issue 1 Security Rating A, STS 222 Issue 4 Burglar Resistance, LPS 1175 Issue 8 Security Rating A1, STS 202 Issue 12 Burglar Resistance BR1 or LPS 1673 Issue 1 Attack Rating AR.A60. Glazing to be laminated. Toughened glass alone is not suitable for security purposes.
5. Lighting - Please note, whilst we are not qualified lighting engineers, any lighting plan should be approved by a professional lighting engineer (e.g. a Member of the Institution of Lighting Professionals), particularly where a lighting condition is imposed, to help avoid conflict and light pollution.
6. Access control. Adequate access control is required for entrances used by staff only such as storage rooms and other restricted areas.
7. Parking - Where unavoidable, the car parking area must be covered by natural surveillance from an "active" window e.g. reception and sufficient lighting. In addition, we recommend CCTV and appropriate signage for visitor bays to avoid conflict and misuse.
8. Waste bins should be kept in a secure enclosure, ideally away from the building as bins can become a climbing aid or even an arson hazard.
9. Any Shutters should be as close to the building line as possible and must avoid the creation of a recess. Shutters must be certificated to LPS 1175: Issue 7, SR2; STS 202: Issue 3, BR2; Sold Secure Gold or PAS 68:2013.

If approved, site security is required for the construction phase. There is a duty for the principle contractor "to take reasonable steps to prevent access by unauthorised persons to the construction site" under the Construction (Design and Management) Regulations 2007. The site security should incorporate plant, machinery, supplies, tools and other vehicles and be site specific to geography and site requirements.



We welcome a discussion with the applicant/agent about site specific designing out crime. If the points above are not addressed, they can affect the development and local policing.

This information is provided by Kent Police DOCO's and refers to situational crime prevention. This advice focuses on CPTED and Community Safety with regard to this specific planning application.

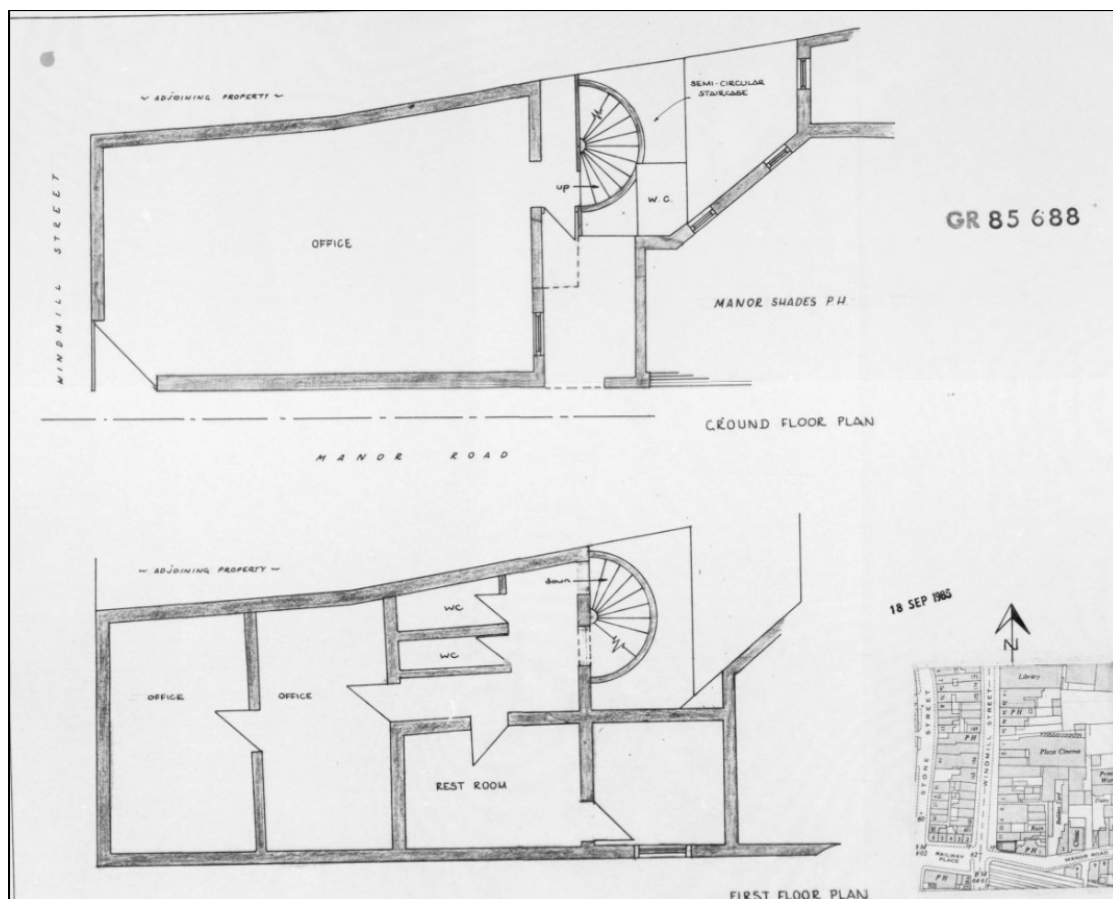
Neighbouring properties

4no. surrounding properties were consulted, and a site notice was displayed. The final date to submit comments ended on 16 January 2026. 0 comments were received from members of the public.

Officer's Analysis

Officer note: The planning statement refers to previous planning permission. However, no previous planning permission for this proposal exists on the site. The reference provided relates to a different application site and a different proposal, so this is assumed to be an error on the planning statement.

The application site received planning permission in 1985 for '*Change of use from Travel Agency to a Building Society Branch Office*' The plans from which are shown below for information purposed (Not to Scale):



Site Description

The site comprises a three-storey mid-terrace building with a commercial unit. It fronts onto Windmill Street within the Gravesend Town Centre Secondary Frontage, an area characterised by shops, restaurants and other commercial uses.

Proposal

The proposed development would change the use of the ground floor from financial and professional services (E(c) to a café/restaurant use (Use Class E(b), comprising the sale of food and drink for consumption on the premises with ancillary takeaway sales, with no primary hot food preparation requiring a fixed extraction system. Internal alterations would also take place to accommodate the change.

Principle of Development

The application site is located within the Gravesend Town Centre Opportunity Area and the Primary Shopping Area. Policy CS05 (LPCS) states that the Opportunity Area will be the principal focus for town centre related economic and social activity in the Borough and that this will be achieved by consolidating the existing retail area, encouraging a mix of employment and residential uses, improving its role as a transport hub by the creation of a public transport interchange, promoting an evening economy through giving support to the provision of leisure uses and taking full advantage of its heritage and riverside setting.

Policy CS08 (LPCS) states that the Council will seek to reinforce a sustainable network and hierarchy of centres which includes maintaining the sub-regional role of Gravesend Town Centre. It states that Gravesend Town Centre will be maintained as the highest order centre within the Borough and the Primary Shopping Area will be the sequentially preferred location for new retail development.

The principle considerations in the assessment of this application are:

- Principle of development
- Design, Character and Appearance
- Amenity of Future Occupiers
- Neighbouring Amenity
- Waste and Refuse

Change of Use

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
1 (Allen Carpets)	E(a)	Monday, Tuesday, Thursday, Friday, Saturday, 9 am–4 pm Sunday Closed Wednesday Closed

Unit no./name	Use Class	Opening Hours
2	Sui Generis	Every day 11am-11PM
2a (Residential above)	C3	N/A
3 (K.J Nails)	E (c) (iii)	Monday-Saturday 9am-6:30pm Sunday 9:30am-4pm
4 (Previously Sally Beauty *Currently Closed*)	E (c) (iii)	N/A
5 (Caribbean Hotpot)	Sui Generis	Monday-Tuesday Closed Thursday-Saturday 12pm-9pm Sunday 12pm-9pm
6 (Sukhothai)	E(b)	Wednesday-Saturday 12–2 pm 6–10 pm Sunday Closed Monday Closed Tuesday 6–10 pm
7 (Southall Street Food)	Sui Generis	Everyday 10 am–10 pm
8-9 (Munns)	E(a)	Monday-Friday 10 am–3 pm Sunday Closed
10 (Mann)	E(c)	Monday-Friday 9 am–5:30 pm Saturday 9 am–2 pm Sunday Closed
11 (Vegan Antics)	E(b)	Friday, Saturday, Wednesday and Thursday 9 am–4 pm Sunday 10 am–4 pm Monday 9 am–2 pm Tuesday Closed
11a (Residential Above)	C3	N/A
12 (Formerly Kent Reliance)	E(c)(i)	N/A
159 (M&M Lettings)	E(c)	Monday - Saturday 9 am–5 pm Sunday Closed
160 (Simpatia)	E(a)	Monday - Saturday

Unit no./name	Use Class	Opening Hours
		9am-9pm Sunday 9am-5pm
161 (RSPCA)	E(a)	Monday – Saturday 9am-4pm Sunday Closed
162 (Super Mart)	E(a)	Monday-Saturday 9 am–6 pm Sunday 12–6 pm
163 (Mr Flower)	E(a)	Monday-Saturday 9am-5pm Sunday Closed
164 (Windmill Butchers)	E(a)	Monday - Friday 7 am–5 pm Sunday 10 am–2 pm
165 (Halifax)	E(c)(i)	Monday-Friday 9:30 am–4:30 pm Saturday 9:30 am–1 pm Sunday Closed
166 (Oxfam)	E(a)	Monday-Saturday 8:45 am–4:45 pm Sunday Closed
167 (Nationwide Building Society)	E(c)(i)	Monday, Tuesday, Thursday, Friday 9 am–4:30 pm Saturday 9 am–12 pm Sunday Closed Wednesday 10 am–4:30 pm

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. The existing use of the application property is already non-retail and as such, there would be no loss of a retail unit, should planning permission be granted.

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.

Design, Character and Appearance

The proposed development would comprise a change of use with no external alterations proposed. The planning statement advises that no kitchen extract system would be required. As such if approved a condition would be placed on the decision requiring that no external ducting systems are placed on the building.

It should be noted that no changes are proposed to the current shopfront. No details regarding signage or advertisements have been submitted as part of this application. Separate advertisement consent would be required for any illuminated signage, which would be determined on its own merits. For the avoidance of doubt, an informative can be added to any planning permission granted informing the applicant of this.

On balance, the proposed development would comply with the requirements of Policy CS19 of the Core Strategy 2014 and paragraph 135 of the NPPF (2024) in terms of design, character and appearance.

Neighbouring Amenity

As outlined above, it is important that any development safeguards the amenity of neighbouring properties and land. Following a period of consultation with neighbouring properties, no objection to the proposal was received.

The neighbouring building contains a residential flat in the upper floors (11a). The introduction of a food use at the application site has the potential to cause adverse odour and noise/disturbance impacts to the occupiers of any surrounding residential properties from cooking/odour extraction activities, customer visits/activities and delivery driver visits/activities.

The proposed opening hours would be 07:00 to 18:00 between Mondays and Fridays and 08:00 and 17:00 Saturdays, Sundays and Bank Holidays. The application site is located adjacent to a public house and as such, any noise/disturbance associated with the proposed development would be experienced in this context. Therefore, the proposed opening hours are considered acceptable and there would be no adverse noise/disturbance impacts. The opening hours can be subject to a planning condition attached to any planning permission granted.

Following comments from Environmental Protection further details were submitted which show the refuse storage area in the basement. Management of the waste is detailed included a weekly collection schedule for general waste and recycling and 2x weekly schedule for food waste. The GBC Waste and Refuse team were consulted and found the submitted details to be acceptable. Following Environmental Protection comments, further details were submitted regarding the that there is a lack of necessity for cooking equipment that would require ventilation. Only a convection oven is required to toast/warm food. The convection oven:

- Captures steam generated during baking process
- Condenses vapor into water internally
- Discharges condensate via drainage pipe to wastewater system
- No external extraction ductwork required

Therefore, the pre-commencement conditions proposed to cover Noise and Odour are not considered necessary in this instance. However, a condition restricting cooking use, and ventilation installation would be applied to restrict adverse impacts in this regard.

Given the established commercial character of Windmill Street, and the presence of existing food and drink premises in the vicinity, the proposed use would not result in unacceptable harm to neighbouring residential amenities, subject to the imposition of appropriate conditions relating to hours of use.

The application site is located in the Gravesend A226 One Way System Air Quality Management Area (AQMA). Although the proposed development would be likely to increase vehicle movements in the surrounding area, it is not considered that the increase above the existing use, would be so significant as to

warrant a refusal on air quality grounds.

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) and Saved Policy S7 of the Gravesham Local Plan First Review (1994).

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.

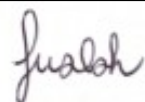
Conclusion

Taking all material considerations into account, including the town centre location and the use of conditions to mitigate potential amenity impacts, the proposal is considered acceptable and complies with all relevant national and local planning policies.

Recommendation

The recommendation is to approve the development.

(For detailed conditions and informatives, see draft Decision)

Case Officer:	Mrs Lisa Fisher	Team Leader:	Mrs Faye Walsh
Signed:		Signed:	

Dated:	19 th January 2026	Dated:	19 January 2026
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