



Delegated Report

Planning Application

Planning Application No: 20240211

Location: 125 Singlewell Road Gravesend Kent DA11 7QA

Description: Retrospective Application for the installation of a new shop front with roller shutter.

Applicant: Mr Suhk Khaira

Site Visit Date: 20.03.24

Submitted Documents/Plans

Application Form

Email confirming description

001 Rev A – Location Plan, Existing Block Plan, Proposed Block Plan

002 Rev A – Pre-existing and Existing Floor Plans

003 Rev A – Pre-existing and Existing Shop Fronts

Relevant Planning History

Reference	Description	Decision	Decision Date
20240210	Retention of a single storey rear extension.	Permitted	30.04.2024
19940563	Formation of self contained flat at 1st. floor level, installation of door at the front, internal alterations and erection of single storey rear extension to form stock room & w.c.	Permitted	10.11.1994
19750424	Internal alterations and increase in retail floorspace at ground floor level and erection of single storey extension at rear to storeroom	Permitted	03.09.1975

Development Plan

Gravesham Local Plan Core Strategy (September 2014):

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS08 – Retail, Leisure and the Hierarchy
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 – Development & Design Principles

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards
- TC9 - Shopfronts

Paragraph 33 of the NPPF (2023) 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 (2023), the Council will also seek to replace these.

National Planning Policy Framework (2023)

- Section 2 – Achieving Sustainable Development
- Section 8 – Promoting healthy and safe communities
- Section 9 – Promoting sustainable transport
- Section 12 – Achieving well-designed and beautiful places

Supplementary Planning Guidance

- SPG 2 - Residential layout guidelines including Housing Standards Policy Statement October 2015 Adopted 1996 – amended June 2020;
- SPG 4 – Security measures for shopfronts and commercial premises Adopted 1996 – amended April 2020.
- Design for Gravesham – Design Code (2024)

Consultations, Publicity and Representations

Consultees

Ward Councillors

No comments received.

Neighbouring properties

A site notice was placed on 28th March 2023 and 7no. surrounding properties were consulted. Following an amendment to the description to include the roller shutter, another site notice was displayed on 13 May 2024 and neighbour letters sent again. 0 comments were received from members of the public and the consultation period expired on 07 June 2024.

Officer's Analysis

The application site consists of a two-storey mid terrace building on Singlewell Road. The building is situated in a local centre, and it was previously in use as 'Hydrofresh' with a flat above. The premises originally had a traditional shopfront which can be seen from the image below, with tile stallrisers which match the majority of the other shops in the parade;

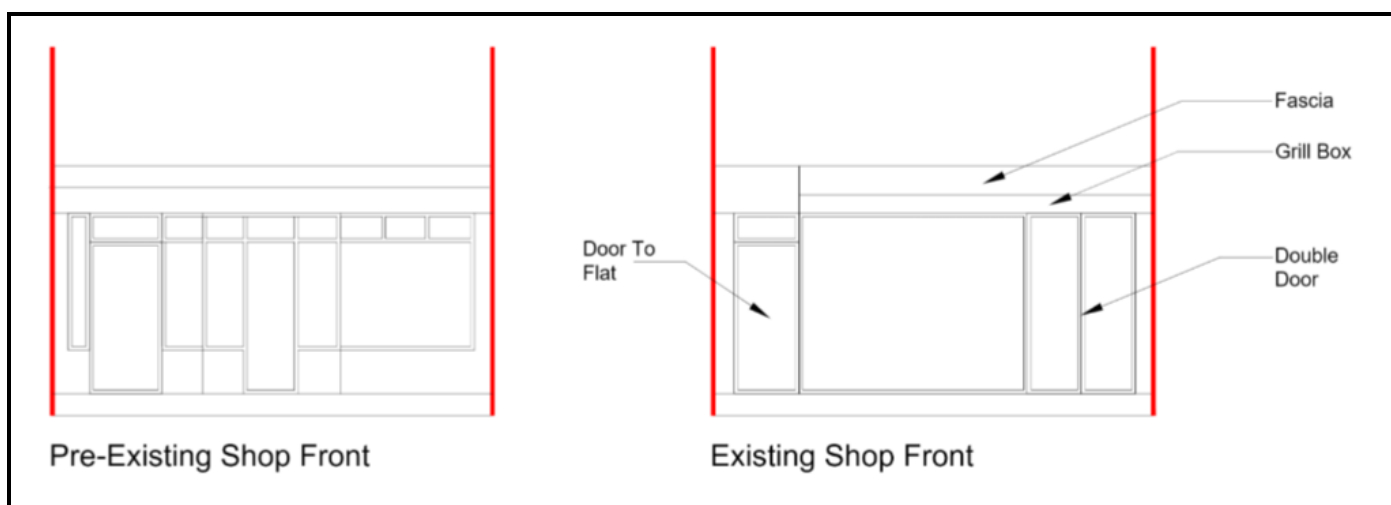


More recently the unit was taken over for use as 'AA Plumbing & Bathrooms'. This is an application for the retrospective changes to the frontage as shown in the below image for reference.



Image taken on 28.03.24

The below image shows how the frontage has changed, with an increase in glazing with loss of partitioned windows with timber glazing bars and loss of tile stallrisers with replacement 'modern' appearance with large glazing panels.



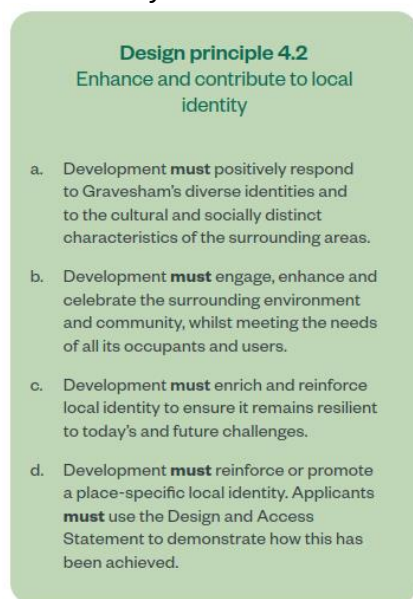
Principle of Development

The application site is located within the urban area where Policy CS02 (LPCS) states that development will be prioritised therefore the principle of the development is considered acceptable in principle.

Design, Character and Appearance

Policy CS19 (LPCS) requires new development to be visually attractive, fit for purpose and locally distinctive. It should conserve and enhance the character of the local built, historic and natural environment and integrate well with the surrounding local area. In particular the design of new development should be derived from a robust analysis of local context and character and make a positive contribution to the street scene and the character of the area.

The Design for Gravesham; Design Code (2024) details how developments must enhance and contribute to local identity.



In this instance, the site does not form a designated heritage asset. However, the parade of shops which the site forms part of, has a traditional row of shopfronts which contributes to the local identity. It is clear that the glazing on the frontage has been increased from the traditional frontage, with windows no longer defined by the timber framework and stallrisers. All other units have stallrisers and central doorways with windows on either side, giving a symmetrical appearance, with smaller windows rather than larger glazing sheets as proposed by this application. These are key characteristics of the shopfront which has been lost by the retrospective changes proposed in this application. The loss of the traditional shopfront in this central position amidst the existing traditional shopfront would result in the loss of traditional and unified features of the previous original shopfront.

This image below has been included to show the original shopfront and its traditional features;



Turning to the roller shutter, neighbouring properties 127 (The bakery) and 129 (The Post Office) both have roller shutters. Based on google street views the bakery had the shutters installed by 2015 and The Post Office had the shutters installed by 2019. The Post Office did not apply for planning permission for the Roller Shutters. The Bakery applied for roller shutters, but the application was withdrawn as insufficient information to validate the application was not received. Neither properties therefore have planning permission for the roller shutters. As such there is no precedent in the local authority granting roller shutters in this location, despite their presence.



Image taken on 28.03.24

Specifically in relation to shopfronts, Policy TC9 of the Local Plan 1994 states that the Borough Council will resist developments that would result in existing shopfronts of traditional design and materials being lost, and that would result in the installation of security grills and shutters on the exterior of shopfronts.

SPG4 provides guidance on roller shutters as follows:

Roller shutters

Roller shutters require planning permission and are generally considered unacceptable. This category of shutter includes those solid roller shutters with viewing panels, perforations, cutouts or holes. Listed building consent is unlikely to be granted for roller shutters on listed buildings. On buildings within conservation areas, planning permission is unlikely to be given. Planning permission in other situations may only be granted if the following exceptional circumstances apply:

1. the applicant must demonstrate, by documentary evidence, that a persistent security problem exists which could only be resolved by the use of solid roller shutters, as opposed to other security measures, eg grilles;
2. the property should be in an isolated situation, where there is no particular need to maintain a shopfront display;
3. any such scheme should be commensurate with the overall aim of achieving a variety of subtle but secure shopfront security measures

If it is considered that the provision of roller shutters is acceptable in principle. Their installation and design should be carried out as sensitively as possible and the following elements should be incorporated:

1. shutter boxes should be located and designed in accordance with the advice for grille boxes;
2. the guidance channels should be concealed or painted to match the shopfront, or be removed during the day;
3. in all circumstances, the shutter shall be sensitively detailed to give relief to the surface of the shutter, to minimise the visual impact;
4. in most circumstances, the shutter should be fitted so as not to obscure any existing pilasters and should be no lower than the top of the stallriser;
5. shutters should not obscure or damage any other architectural features;
6. shutters should have no viewing panels, but should be perforated and colour finished to match the shopfront;
7. consideration should also be given to incorporating quality sign writing, detailing the name and/or trade of the business. This may require advertisement consent, involving a separate application.

As per the guidance, roller shutters are considered unacceptable unless evidence has been provided which demonstrates a persistent security problem exists which could only be resolved by the use of solid roller shutters and where the property is in an isolated situation. In this instance, neither exception apply and so the use of roller shutters is unacceptable in principle.

The elevations show a replacement frontage with inappropriate level of glazing, which would not be reflective to the local streetscene. Also, the shutter as evident on the site visit, results in a closed frontage covering the traditional shopfront and the glazing which would be harmful to the character of the area as it would not be reflective and would result in an oppressive and 'closed' appearance to the front of this row of retail units. It has been confirmed by the applicant that the shutter will be down for the most part, as they do not intend on having opening hours. As such this results in the open frontage of a shop within a parade being closed.

On balance, the proposed development would **NOT** comply with; the Security measures for shopfronts and commercial premises Supplementary Planning Document (SPG 4), saved Policy TC9 of the Gravesham Local Plan 1994, Policy CS19 of the Gravesham Local Plan Core Strategy 2014 and paragraph 135 the National Planning Policy Framework (2023).

Amenity of Future Occupiers

The NPPF (2023) states that planning decisions should aim to secure a high standard of amenity for all existing and future users. The impact on amenity is also considered with regard to the criteria with Policy CS19 of the Core Strategy, which states that new development should be located, designed and constructed to safeguard the amenity, including privacy, daylight and sunlight, of its occupants, and those of neighbouring properties and land. The impact on neighbours will be assessed in the next section of the report.

The building is assumed to be in use as a retail unit with a flat above given this is the last known use and no change of use of the premises has been submitted. The first floor is accessed from the front of the building. Access continues to be available from the same position albeit with a replaced door. No internal changes are proposed.

In respect of the amenity of occupiers the proposal on balance is therefore considered compliant with Policy CS19 (LPCS).

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.

Whilst the site forms a row of retail units, there are a number of flats above the shops. The alterations do not result in any overbearing bulk or overshadowing to neighbouring properties. Nor would it directly overlook private amenity spaces.

The proposal is therefore considered to safeguard the amenity of neighbouring properties in compliance with policy CS19 of the Core Strategy 2014.

Conclusion & Recommendation

The poor design and materials of this retrospective shopfront, together with the loss of traditional and unified features of the previous original shopfront, are considered to significantly harm the character and appearance of the application building and fails to preserve or enhance the character of the streetscene and surrounding retail units. The proposal therefore fails to comply with the requirements of Section 4.2 of the Design for Gravesham – Design Code (2024), saved Policy TC9 of the Gravesham Local Plan 1994, Policy CS19 of the Gravesham Local Plan Core Strategy 2014 and paragraph 135 the National Planning Policy Framework (2023).

The introduction of roller shutters on this traditional shopfront is considered to significantly harm the character and appearance of the application building and fails to preserve or enhance the character of the streetscene and surrounding retail units, accentuated by the shutter being closed during day time hours. The proposal therefore fails to comply with the requirements of the Security measures for shopfronts and commercial premises Supplementary Planning Document (SPG 4), and Section 4.2 of the Design for Gravesham – Design Code (2024), saved Policy TC9 of the Gravesham Local Plan 1994, Policy CS19 of the Gravesham Local Plan Core Strategy 2014 and paragraph 135 the National Planning Policy Framework (2023).

The recommendation is to refuse this application.

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

Case Officer:	Mrs Lisa Fisher	Team Leader:	Miss Faye Hobbs
Signed:		Signed:	
Dated:	30 th July 2024	Dated:	31 July 2024