

Mr Richard Hart
Gravesham Borough Council Civic Centre
Windmill Street
Gravesend
Kent
DA12 1AU

Date: 20 December 2021
Our reference: I1104050

Dear Sir / Madam

Units 18 – 19 and Unit 20 St. George's Shopping Centre | Advertisement Consent Application

On behalf of our client, Reef Group, the owners of the St George's Shopping Centre, we hereby submit an Advertisement Consent application for the installation of 10no. non-illuminated fascia signs, 2no. illuminated fascia signs, and 1no. non-illuminated projecting blade sign at Units 18, 19 and 20 at St George's Shopping Centre, Bath Street, Gravesend, DA11 0TB (hereinafter 'the Site').

The description of development is as follows:

"Display of 10no. non-illuminated fascia signs, 2no. illuminated fascia signs, and 1no. non-illuminated projecting blade sign".

The following documents have been submitted in support of this application:

- Planning Application Form;
- Site Location Plan (PL18.01);
- Ground Floor Plan (PL18.04);
- Units 18 – 19 Existing Elevation (PL18.05);
- Unit 20 Existing Elevation (PL18.06);
- Units 18 – 19 Proposed Elevation (PL18.07);
- Unit 20 Proposed Elevation (PL18.08);
- Unit 18 – 19 Signage Details (PL18.10 & PL18.11);
- Unit 20 Signage Details (PL18.12 & PL18.13); and
- Proposed Signage Visualisations (PL18.02 & PL18.02).

In addition to the above, the requisite fee of £132 has been paid via the Planning Portal. The Planning Portal reference for this submission is PP-10492544.

This letter serves as our Planning Statement and sets out details of the proposed signage. In addition, this letter assesses the proposed development against the current national, regional and local planning policy.

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The Site

The application site comprises Units 18-19 and Unit 20 of St. George's Shopping Centre, which lies within the designated Primary Shopping Area of Gravesend Town Centre.

The Site is currently vacant and comprises 470 sq. m. of Use Class E floorspace. Units 18-19 has been vacant since the April 2019. The Units are split over two floors, with retail space at the ground floor 'Mall' level, and back of house space at first floor 'Servicing Deck' level. Unit 20 has been vacant since August 2020, and wholly sits at ground floor level.

St. George's Shopping Centre comprises 37 retail units (falling under Use Class E), and has an overall floor area of 20,766 sq. m. The Site fronts onto the internal pedestrian walkway of the St. George's Shopping Centre, it adjoins Unit 17 to the east which is occupied by "Goatcher Chandler" and to the south by Units 21 – 22 which are currently vacant. The Site is also located adjacent to Units 26 – 29 which are occupied by "Anytime Fitness".

St. George's Shopping Centre is broadly bound to the north by St. George's Church; to the east by Princess Street; to the south by New Road; and to the west by Bath Street.



Figure 1 – Site Location

Planning History

A review of the Council's online planning records confirms that St. Georges Shopping Centre has a detailed planning history. The most relevant permissions are as follows:

- **19770445** | Outline application for development for shopping and office purposes together with a car park and all necessary servicing | Permitted 10/11/1977.
- **19790100** | Details of redevelopment for shopping purposes together with a car park and all necessary servicing | Permitted 13/02/1979.
- **20180903** | Refurbishment of St. George's Centre, to include: the removal of internal canopies; refurbishment of internal canopies; alterations to entrance canopies; replacement of flooring; update and refurbishment of soffits, blank walls, fascias, shop fronts, undercroft areas; and an updated lighting scheme | Permitted 13/12/2018.

Most recently application Ref: **20211051** was approved on the 21st October 2021 for:

"Full Planning Application for the change of use of Units 18-19 from Retail (Use Class E) to Art Gallery (Use Class F1) and Co-Working Space (Use Class E); and external alterations to Units 18-19 and Unit 20".

This application is for signage pursuant to the above change of use application (Ref. 20211051).

Proposed Signage

This application seeks Advertisement Consent for the display of 2no. illuminated fascia signs, 10no. non-illuminated fascia signs and 1no. non-illuminated projecting blade sign on the northern (interior mall) elevation of Units 18-19 and Unit 20 of St. George's Shopping Centre, as shown in **Figures 2** below:



Figure 2 – Visualisation of proposed signage.

It is proposed to display 12no. fascia signs on the shopfront, 2.3 metres above ground floor level (above the shopfront glazing and doorways). Two of these proposed fascia signs (18b and 19b) will be internally illuminated (below 200 cd/m²).

It is also proposed to display a single non-illuminated projecting blade sign on the shopfront of Unit 20, which will project 42 centimetres from the shopfront.

The “*St Georges Arts Centre*” and “*Creative Gravesham*” branding will be clearly displayed on the signage in white text and red, orange and yellow logos, set onto black backing.

The specifications of the proposed fascia signs and projecting blade sign are detailed in the accompanying proposed signage details documents (PL18.10, PL18.11, PL18.12 & PL18.13).

Local Development Framework

This Section sets out the planning policy framework against which the proposed development should be assessed. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise.

For the purpose of assessing the proposed development, the Local Development Framework for Gravesham Brough Council comprises:

- Gravesham Core Strategy (2014); and
- Gravesham Local Plan First Review (1994) (Saved Policies 2007).

Other material considerations include:

- National Planning Policy Framework (2021); and
- Gravesham Advertisement Control Policy Guidelines SPD (2020).

Additionally, Gravesham Brough Council (GBC) in the process of reviewing the Core Strategy and adopting a Site Allocations Development Management Policies Document.

GBC published the draft Reg 18 Local Plan in October 2020 which was following by a public consultation that ran from October to December 2020. It is expected that GBC will carry out the next stage of consultation (Reg 19) in early 2022. The revised Core Strategy, and Site Allocations Development Management Policies Document Plans are not due to be adopted until 2023 and therefore carry limited weight.

Under the Gravesham Local Plan Core Strategy Policies Map (2014), the Site is designated as falling within Gravesend Town Centre, the Primary Shopping Area and Gravesend Town Centre Opportunity Area.

Planning Policy Assessment

The National Planning Policy Framework (NPPF) (2021) sets out the overarching planning guidance to which all Development Plan Documents should comply. As such, the NPPF is a material consideration of considerable weight. Guidance as to how the NPPF, Planning Policy and Planning Law should be used in practice is provided within the National Planning Practice Guidance (NPPG).

Paragraph 126 seeks to ensure that the planning system leads to the creation of high quality buildings and places which is cited as a key element of sustainable development in order to create better places to live and work, helping to foster support for development among local communities.

Paragraph 136 of the NPPF sets out that the control of advertisements should only be in the interests of public safety and amenity.

Saved Local Plan Policy TC8 explains that all applications for advertisement consent will be examined in the light of the Borough Council's adopted policy guidelines for advertisement control and displays which are detrimental to public safety or to amenity will be resisted.

The Gravesham Advertisement Control Policy Guidelines SPD (2020) recognises that advertisement displays can add to the appearance of Gravesend as a lively and prosperous shopping centre. Accordingly, the level of advertisement display acceptable in the town centre shopping area will be higher than elsewhere in the Borough.

Policy 1 of the SPD sets out that advertisements, including illuminated advertisements, will generally be acceptable on business premises in the Town Centre shopping area. However, the Borough Council will expect displays to be well designed and attractive.

Policy 7 expects advertisement displays 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; and
- Advertisement displays should not be detrimental to public safety, particularly on the highway.

Policy 8 sets out that advertisements should not obstruct visibility, interfere with the interpretation of road signs or traffic signals, or distract the attention of drivers.

Wherever feasible, applicants should observe the following basic design points:

1. Advertisement proportions - depth should not exceed a quarter of the shopfront height to underside fascia.
2. Type back-lit letters or "halo" lit, or good-quality external illumination.
3. Materials – These should not clash with adjacent shopfronts or be garish. Large areas of acrylic or other shiny materials should be avoided. The use of matt finish or timber painted fascias will be preferred, as will dark fascias with white or light-coloured lettering
4. Illumination -Any illumination used should conform with the luminance recommendations of the Institution of Lighting Engineers' Technical Report
5. Brightness of Illuminated Advertisements, in respect of internally illuminated advertisements which are visible from the highway.

Planning Policy Compliance

Given the proposal and the planning policy context identified above, the planning considerations relevant to this development are Design, Amenity and Public Safety. These are discussed in detail below.

Design and Amenity

In accordance with **Saved Local Plan Policy TC8** and **Gravesham Advertisement Control Policy Guidelines SPD (2020)**, the proposed signage is of a high-quality, contextually appropriate design. The signage is located within a Shopping Centre, and is not located within close proximity to any Listed Buildings or Conservation Areas.

The proposed signage is of a type and scale that is to be expected within a Shopping Centre. It should be noted that Units 18, 19 and 20 were previously operated as retail units with shopfront signage in place; thus, this application simply seeks to update signage that was previously in place. Owing to the surrounding context, and the small-scale nature of the proposals, it is not considered that the proposed signage would add to visual clutter. In this respect, the proposals accord with **Policy 7** of the Advertisement Control Policy Guidelines SPD.

The proposed signage has been designed in consideration of the design principles set out in **Policy 8** of the Advertisement Control Policy Guidelines SPD. It should be noted that the 2no. illuminated signs are of a good-quality external illumination, not exceeding 200 cd/m², in accordance with **Policy 8 (2), (4) and (5)**. All signs are of a high-quality, contextually appropriate colour and materiality, with white or light-coloured lettering on a darker background (as encouraged by **Policy 8 (3)**). As required by **Policy 8 (1)**, the depth of each proposed sign does not exceed a quarter of the shopfront height to the underside of the fascia.

Assessment of the impact on amenity is generally consideration as to whether the advertisements will affect the visual appearance of the area. In this case, the proposed fascia signs are similar to those currently provided at the St. Georges Centre, they reflect company corporate image and branding of the St Georges Arts Centre and Creative Gravesham; and are suitably located and proportionate to the shopfront elevation of the building as shown on the submitted drawings. As such we consider that the proposed fascia adverts comply with **Policy 1** of the Gravesham Advertisement Control Policy Guidelines SPD, and will have no adverse effect on public amenity in accordance with **Policy 7**.

Public Safety

In accordance with **Policies 7 and 8** of the Advertisement Control Policy Guidelines SPD, the proposed signage will not affect public safety. In this case the proposed signage is not located on a public highway and is situated within an enclosed pedestrianised mall. As such the proposed signage and illumination will have no effect on public safety in accordance with Policies 7 and 8.

Having regard to all of the above, the proposed signs are considered to be proportionate, well located and designed to have no adverse effects on either amenity or public safety. The proposed advertisements are therefore considered to be fully acceptable.

Conclusion

This proposal seeks Advertisement Consent to install 10no. non-illuminated fascia signs, 2no. illuminated fascia signs, and 1no. non-illuminated projecting blade sign on the northern (interior mall) elevation of Units 18-19 and Unit 20 of St. George's Shopping Centre.

The above proposal fully accords with adopted planning policies, and responds to modern market demands. Therefore, in accordance with Paragraph 11 of the NPPF, it should be approved.

We trust that you have all of the necessary information to progress with this Advertisement Consent application, and we look forward to receiving confirmation of validation. If you have any queries, please do not hesitate to contact me at this office.

Yours faithfully,



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