



Delegated Report

Full Planning Application

Planning Application No:	20230532
Location:	14 & 15 King Street, Gravesend, Kent, DA12 2EB
Description:	Conversion of both existing ground floor units into one retail unit together with alteration of the two existing shopfronts to form one shopfront.
Applicant:	Mr Bal Kundi
Site Visit Date:	4 August 2023

Submitted Documents/Plans

Application form
Location Plan
Drawing no. D01 (Existing and Proposed Ground Floor Plans)
Drawing no. D02 (Existing Front and Rear Elevations)
Drawing no. D02 (Proposed Front and Rear Elevations)
Design and Access Statement

Relevant Planning History

Reference	Description	Decision	Decision Date
20191243	Retention of existing timber windows and external painted fenestration.	Refused Appeal dismissed	10.02.2020 14.07.2020
20190043	Application for approval of condition 3 attached to planning permission reference number 20170577 relating to the details of the materials to be used in the external faces of the extension.	Approval of details	30.09.2019
20180592	Application for approval of condition 3 attached to planning permission reference number 20170577 relating to the details of the materials to be used in the external faces of the extension.	Refusal of details	18.07.2018
20170577	Erection of single storey rear extension.	Permitted	19.02.2018
20090106	Display of externally illuminated fascia sign and externally illuminated hanging sign at first floor level.	Refused	27.03.2009

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale and Distribution of Development

- CS05 – Gravesend Town Centre Opportunity Area
- CS08 – Retail, Leisure and the Hierarchy of Centres
- CS11 – Transport
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 – Design and Development Principles
- CS20 – Heritage and the Historic Environment

Saved Policies in the Gravesham Local Plan First Review (1994)

- TC3 – Development Affecting Conservation Areas
- TC9 – Shopfronts
- T1 – Impact of Development on the Highway Network
- P3 – Vehicle Parking Standards

The Council has a statutory requirement under Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) which states that, with respect to buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

Paragraph 33 of the NPPF (2021) 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 (2021), the Council will also seek to replace these.

National Planning Policy Framework (2021)

- 2 – Achieving sustainable development
- 6 – Building a strong, competitive economy
- 7 – Ensuring the vitality of town centres
- 9 – Promoting sustainable transport
- 12 – Achieving well-designed places
- 15 – Conserving and enhancing the natural environment
- 16 – Conserving and enhancing the historic environment

Supplementary Planning Guidance

- SPG4 – Security measures for shopfronts and commercial premises (2020)
- SPG4 – KCC Parking Standards (2006)
- Technical Housing Standards – Nationally Described Space Standards (2015)
- Management Plan – Gravesend Town Centre Conservation Areas (2009)
- King Street Conservation Area Character Appraisal (2009)
- Design Sheets 1-6

Consultations, Publicity and Representations

Consultees

GBC Conservation

No comments received.

Neighbouring properties

The application has been advertised by individual neighbour letters to 29 properties, and on site and in the press. The overall consultation period expired on 1 September 2023.

No letters of representation have been received from neighbouring properties.

Local Ward Councillors were also consulted, and no responses were received.

Officer's Analysis

Proposal

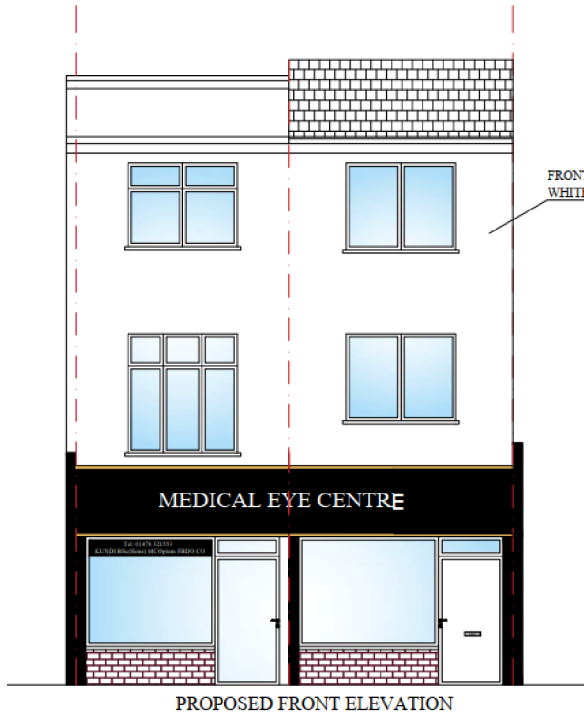
This application seeks permission for the conversion of both the existing ground floor units into one retail unit together with the alteration of the two existing shopfronts to form one shopfront.

The existing unit at No. 14 is a medical eye centre. The owner of the eye centre has purchased the unit next door at No. 15 and wishes to expand the business into this property. The internal wall will be removed on the ground floor between the two units to create a larger floor space. The existing internal staircase at No. 14 will be relocated to No. 15, served by the existing door opening and a new internal wall will be installed around the staircase. A new stallriser will be created as part of the new shopfront to No. 15. The plans state that the materials will match the existing; the existing shopfronts appear to be aluminium and the stallriser at No. 14 is brick. A fascia design similar to that at No. 14 will be extended across the whole of the two units but the fascia will be deeper.

Existing elevation



Proposed front elevation



The submitted statement asserts that timber windows are proposed to replace the 'existing poor windows' but the openings are blocked up (and have been for at least 9 years according to Google Street View) so it is not possible to see the state of any existing windows. The application form states that there are existing timber sash windows and that the proposed windows will also be timber sashes. However, sash windows are not shown on the plans.

There are various discrepancies in the submitted plans:

- there is an existing recessed door to No. 14 that is not shown on either the existing or proposed plans;
- there are blocked out window openings on the first and second floors of No 15 that are not shown on the existing elevation, and the elevations do not accurately reflect the sizes of these window openings, which are smaller than those at No. 14;
- the scale bar on the proposed elevation is incorrect;
- the existing fascia is not drawn correctly as it is not shown to be sitting between existing corbels;
- a first floor doorway at the rear is also shown to be altered on the proposed plan but this is not mentioned anywhere in the application.

Principle Issues

The main issue to consider in the determination of this application is the design of the shopfront changes and the impact on the application buildings and surrounding street scene. There are no amenity or highways concerns.

Design, Character and Appearance

Section 12 of the NPPF 2021 relates to achieving well-designed places and sets out the Government's requirements in relation to design issues. Paragraph 126 emphasises the importance of achieving high quality, beautiful and sustainable buildings and places. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

Paragraph 130 of the NPPF 2021 seeks to ensure that development will add to the quality of an area, be

visually attractive, and sympathetic to local character and history. Policy CS19 of the Core Strategy 2014 reflects these aims and requires that new development is well designed and respects the character and appearance of the surrounding area.

Nos. 14 and 15 King Street lie within the Gravesend Town Centre Opportunity Area and the King Street Conservation Area. In line with Policy CS05 (Gravesend Town Centre Opportunity Area) of the Core Strategy 2014, it is important that redevelopment is supported where this improves townscape character.

The NPPF 2021 also places great significance on the desirability of sustaining and enhancing heritage assets, and on new development making a positive contribution to local character and distinctiveness (paragraphs 197 and 190 respectively). This is echoed in Policy CS20 of the Core Strategy 2014, which states that the significance of the Borough's heritage assets and their setting should always be preserved or enhanced. Saved Policy TC3 of the Local Plan 1994 also states that development is expected to make a positive contribution to the conservation area.

The Council's planning guidance for shopfronts within the town centre or local shopping centres seeks high standards of shopfront design and aims to ensure shopfronts are designed to maintain the attractiveness of the centre. Any proposed alterations should therefore be well designed, including the type and colour of materials, and appropriate in terms of the scale and character of the original building, in order to make a positive contribution to the area. This is particularly important in the context of historic streets and conservation areas.

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.

It is recognised within the King Street Conservation Area Appraisal that Nos. 14 and 15 King Street are under maintained and that the installation of shopfronts of a traditional design in King Street would raise the quality of this environment. The Appraisal states that a negative feature of King Street is the poor quality of existing shopfronts and signage.

This application presents a good opportunity to improve the shopfront design at the units. However, unfortunately, there are various discrepancies within the application submissions, and a complete lack of any detail in the plans or proposed materials. Materials are simply stated to 'match existing' but as the existing shopfront, particularly at No. 15, is of such poor quality, matching materials would not be acceptable here. There is no heritage statement provided to help describe the significance of the buildings in the Conservation Area and the justification for the works.

The Council's Design Sheets 1-6 provide guidance to support the supplementary planning guidance on shopfront and commercial premises (SPG3 and SGP4). In relation to the application proposal there are various relevant points to be taken from the guidance:

- (Design Sheet 1: Introduction to the general principles of shopfront design, access to upper floors and the need for consent) Traditionally designed shopfronts should be retained.
- (Design Sheet 3: Design details; door & access, stallriser, pilasters and fascia) A removal of a recessed doorway to create a doorway opening straight onto the pavement will not normally be permitted; stallrisers can be rendered, painted timber panelling, stone or marble faced or tiled; pilasters should always be incorporated into the shopfront design; fascias are normally enclosed by cornices and capitals or console brackets supported by pilasters; the height of the fascia should be appropriately scaled in relation to the overall proportion of the shop and should not exceed 20 per cent of the overall shopfront.
- (Design Sheet 4: Materials, timber specification and finish) Stainless steel, natural finish or powder coated aluminium and plastic lack the visual quality of wood and are unlikely to find approval for Listed Buildings or buildings in a Conservation Area.

Considering the requirements of the policies and guidance above, the changes proposed to the shopfronts are unacceptable. Whilst the individual pattern of the two units will generally be retained, traditional

elements such as the recessed door and existing pilasters and brackets on the fascia will be removed. The shopfronts appear to be aluminium and the stallrisers are brick, both of which are inappropriate in terms of proposed materials and would be visually harmful to the application buildings themselves and the wider conservation area within which they sit. Furthermore, the excessive height of the fascia is out of proportion with the scale and height of the buildings.

In addition, the seemingly larger first and second floor window openings and proposed replacement window design would not be acceptable, particularly given the history of the relatively recently refused and dismissed proposal for replacement windows at No. 14 under application 20191243. Whilst these windows are timber, their thick framed design was not considered acceptable, and this was supported at appeal.

The poor design and materials of the proposed shopfronts and windows, with the loss of traditional and original features, and the lack of any consideration to the Conservation Area designation, will significantly detract from the character and appearance of the application buildings and fail to preserve or enhance the surrounding Conservation Area.

The proposal would therefore fail to comply with the above requirements of saved Policies TC3 and TC9 of the Local Plan 1994, Policies CS05, CS19 and CS20 of the Core Strategy 2014 and paragraphs 126, 130, 190 and 197 of the NPPF 2021.

New signage would be the subject of an advertisement consent application and would be appropriately assessed as and when such an application is submitted, with a particular consideration of the designation of the site. An informative should be included on this basis.

Conclusion and Recommendation

The proposal has many discrepancies in the submitted plans and a lack of information on the detailed design of the replacement shopfronts, fascia and first and second floor windows to provide any confidence that the proposal would preserve or enhance these buildings within the King Street Conservation Area. This application is accordingly recommended for refusal on the following ground:

The lack of information on the detailed design of the shopfronts and fascia, or on the significance of the heritage of the buildings, and the general poor design and materials proposed, together with the loss of traditional shopfront features, are considered to significantly harm the character and appearance of the application buildings and would fail to preserve or enhance the surrounding King Street Conservation Area. The proposal therefore fails to comply with the requirements of saved Policies TC3 and TC9 of the Gravesham Local Plan 1994, Policies CS05, CS19 and CS20 of the Gravesham Local Plan Core Strategy 2014 and paragraphs 126, 120, 190 and 197 of the National Planning Policy Framework 2021.

(For reason for refusal and informatives, see draft Decision)

Case Officer:	Mrs Katherine Parkin	Team Leader:	Richard Hart
Signed:		Signed:	
Dated:	30th August 2023	Dated:	31st August 2023