

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

Date: 11 August 2021
Our reference: I1104049

Dear Sir / Madam

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

On behalf of our client, Reef Group, the owners of St. George's Shopping Centre, we hereby enclose a planning application seeking approval 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, St. George's Shopping Centre, Bath Street, Gravesend, DA11 0TA (hereinafter 'the Site').

The description of development is as follows:

"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".

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

- Planning Application Form;
- Site location Plan (PL.18.01);
- Block Plan (PL.18.02);
- Existing Mall Level Plan (PL.18.03);
- Existing Servicing Deck Level Plan (PL.18.04);
- Existing Elevations (PL.18.05);
- Proposed Mall Level Plan (PL.18.06);
- Proposed Servicing Deck Level Plan (PL.18.07);
- Proposed Elevations (PL.18.08).

In addition to the above, the requisite fee of £462 has been paid via the Planning Portal. The Planning Portal reference for this submission is **PP-10115359**.

This letter serves as our Planning Statement; it sets out details of the proposed change of use and the proposed external alterations; and assesses these against current national and local 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.

Other than the applications set out above, the planning history for the St. Georges Centre is typified by piecemeal refurbishment and various changes of use relating to individual units therein. In addition, there have been several permissions relating advertisements and shopfront alterations.

Proposed Development

The proposed development comprises 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.

The Units currently comprise 470 sq. m. of retail floorspace (Use Class E). Units 18-19 have a floorspace of 293 sq. m. and Reef Group seek to operate 214 sq. m. of this space as an Art Gallery and 79 sq. m. as Co-Working Space.

Unit 20 comprises 177 sq. m. of Use Class E floorspace, given its proposed use as a café/event space (Use Class E), a formal change of use is not required. This has been confirmed by Officers at Gravesend Borough Council.

The art gallery and café/event space will be located at ground floor 'mall' level and will be linked by a new set of double doors set into the adjoining wall between the units - allowing them to be used separately or as single space. The flexible co-working space will be located at the first-floor level of Unit 18 – 19.

In order to facilitate the change of use, a number of small-scale shopfront alterations are required. Firstly, the three existing sets of entrance doors within the shopfronts will be replaced with new aluminium framed powder coated doors in white finish (to match the existing shopfront). This will not result in a change to the shopfront layout and the doors will remain in the same locations as existing.

Secondly, at the upper level, the existing set of windows on the northern 'mall' elevation will be replaced by a single larger window in an aluminium framed powder coated grey finish. The existing portion of brick wall between the existing windows will be removed to allow the installation of the proposed larger window. The existing louvre panels on the eastern 'servicing deck' elevation will also be replaced by a new set of aluminium framed powder coated windows in grey finish. As part of this the opening in the wall will be made larger to allow the installation of the set of windows.

These new windows will allow more natural light into the proposed co-working space at first floor level. Overall, these are small scale alterations, which will improve the aesthetic appearance of the units and the functionality of the internal space.

No advertisements are proposed as part of this application. Any signage for the art gallery, co-working space and café will be covered by a separate Advertisement Consent Application.

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);

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 Regulation 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 (Regulation 19) in late 2021. The revised Core Strategy, and Site Allocations Development Management Policies Document Plans are not due to be adopted until late 2022 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 Government's planning policies for England and how they are expected to be applied. The NPPF encompasses an overarching principle of sustainable development and seeks to use the planning system as a means of facilitating positive sustainable growth through appropriate development.

Paragraph 11 of the NPPF explains that plans and decisions should apply a presumption in favour of sustainable development, and that LPA's should approve development proposals that accord with an up-to-date development plan without delay.

Paragraph 81 of the NPPF stipulates that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

Chapter 7 of the NPPF encourages the implementation of positive planning policies that promote competitive town centre environments. As such, Local Planning Authorities are encouraged to: "support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation", and "promote their long-term vitality and viability".

Annex 2 (Glossary) of the NPPF confirms that "*Main Town Centre Uses*" include offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Core Strategy **Policy CS02** (Scale and Distribution of Development) includes the strategic objective of revitalising the Gravesend Town Centre Opportunity Area as a focal point for retail, leisure, cultural and tourism facilities and small scale office provision to serve the needs of the Borough whilst preserving and enhancing its character as a riverside heritage town.

Core Strategy **Policy CS07** (Economy, Employment and Skills) seeks the delivery of new office, retail cultural and leisure space within Gravesend Town Centre.

Core Strategy **Policy CS08** (Retail, Leisure and the Hierarchy of Centres) sets out that Gravesend Town Centre will be maintained as the highest order centre within the Borough and retail, leisure, entertainment facilities and the more intensive sport and recreation uses will be directed to the primary shopping area.

Core Strategy **Policy CS05** (Gravesend Town Centre Opportunity Area) identifies Gravesend Town Centre as the principal focus for town centre related economic and social activity in the Borough. It supports improvements to the enhancement of retail, leisure, entertainment, cultural and tourism provision.

Local Plan Saved **Policy S3** (Policy for Maintenance of Shopping Frontage) states that Council will generally resist changes of use to alternatives other than shopping (within Use Class A1) at ground floor level or the principal trading level.

The Local Plan also recognises that some non-shopping uses require a location within the town centre shopping area. As such saved **Policy S4** (Policy for Non-shopping Uses in the Shopping Areas) sets out that Borough Council will allow changes of use to uses which are appropriate to the Town Centre Shopping Area and which require a shop window frontage, including uses falling within Use Class A2, provided that the total number of buildings in such uses in each particular length of street is not excessive.

Local Plan Saved **Policy TC9** (Shopfronts) sets out that the Borough Council will resist developments which would result in existing Shopfronts of traditional design and materials being lost and the installation of security grills and shutters on the exterior of Shopfronts.

Emerging Local Plan **Policy RE1** (Shopping Frontages in Gravesend Town Centre) sets out that development within Gravesend Town Centre is expected to contribute positively towards maintaining its distinctive character, range of services and status as the highest order centre within the borough.

Additionally, the Council will seek to ensure that the vitality and viability of the retail frontage within which it is located is not undermined either through the introduction of inappropriate uses or the overconcentration of a particular type of use. In considering proposals under this section, regard will be had to the proposed opening hours of the unit and the level of footfall likely to be generated during normal shop opening hours compared to the existing use.

As part of new developments in appropriate locations in the Primary Shopping Area, the modernisation of or merging of shop units to meet the needs of the market will also be supported where it also accords with other policies set out in this Local Plan and respects local context.

The supporting text of **Policy RE1** recognises that in the town centre many upper floors are currently underused and capable of being used beneficially for residential, office or other uses suitable for a town centre location. The introduction of these uses will be supported where they provide a good standard of amenity for future occupiers and are otherwise acceptable in policy terms.

Emerging Local Plan **Policy RE2** (Complementary, Cultural and Tourism Uses in Gravesend Town Centre) states that proposals for complementary town centre uses including recreation, creative arts, cultural and tourism development will be supported where they are compatible with and maintain the vitality and viability of the retail frontage on which they are located and the town centre in general.

Emerging Local Plan **Policy DES2** (Shopfront Design) requires that new shopfronts should be of high-quality design and respond positively to the character of the building and its location.

Planning Policy Compliance

The proposed shopfront changes and the principle of operating Units 18 – 19 and 20 as an Art Gallery (Use Class F1), Café (Use Class E) and Co-Working Office Space (Use Class E) is in compliance with national and local planning policy, as set out above.

Planning policy at all levels encourages development that supports the viability and vitality of Town Centres, and promotes competitive Town Centre economies (**Chapter 7 of the NPPF**; **Core Strategy Policy CS08**; **Emerging Local Plan Policies RE1 and RE2**).

While Local Plan **Saved Policy S3** states that Council will generally resist changes of use to alternatives other than shopping at ground floor level, **Saved Policy S4** recognises that some non-shopping uses require a location within the town centre shopping area, and Core Strategy **Policy CS08** sets out that leisure and entertainment facilities will be directed to the primary shopping area in which the Site sits.

The principle of enabling Town Centres to adapt flexibly to respond to challenges facing the High Street, is supported by **NPPF Chapter 7**, **Core Strategy Policies CS05, CS07** and **Emerging Local Plan Policy RE1**.

It should be noted that there are currently nine empty units within the St. Georges Centre, including Units 18 – 19 and Unit 20, which have been vacant for over 2 years and 1 year, respectively. The proposed uses comprise an Art Gallery (Use Class F1), Café (Use Class E) and Co-Working Office Space (Use Class E) which are all considered Main Town Centre Uses as set out in the NPPF. The provision of these complementary town centre uses is supported by Core Strategy **Policy CS05** and **Emerging Local Plan Policy RE2** which seeks the enhancement of arts, leisure, entertainment, cultural and tourism provision in Gravesend Town Centre.

The delivery of office space in Gravesend Town Centre accords with **Core Strategy CS07**, additionally the supporting text of **Emerging Local Plan Policy RE2** encourages the upper floors of buildings which are currently underused and capable of being used beneficially to be brought into residential, office or other uses suitable for a town centre location. Given the upper floor of unit 18 – 19 is currently vacant and has been historically underutilised, the provision of co-working office space at the upper level should be supported given it will better utilise the space and bring it back into economic use.

The proposal will bring the units back into use and deliver a mix of town centre uses which will help maintain the vitality and viability of the retail frontage in accordance with **Emerging Local Plan Policy RE2**. The introduction of a new creative mixed-use Art Gallery, Café and Co-Working space within Gravesend Town Centre will encourage visitors and workers into the Town Centre, add to the thriving concentration of retail units within the area, and will encourage linked trips.

Overall, the proposal will help maintain Gravesend Town Centres distinctive character, range of services and status as the highest order centre in line with Emerging Local Plan **Policy RE1** and ensure it remains a focal point for retail, leisure, cultural, office and tourism facilities as per the strategic objective of Core Strategy **Policy CS02**.

The proposed development will not result in the loss of a traditionally designed shopfront and the proposed replacement shopfront doors and first floor windows will be of a high-quality that matches the design and quality of the existing shopfronts in the St. Georges Centre. Importantly, the Units will continue to provide active frontages, and will better enhance the

streetscene. As such the alterations to the shopfront and windows accords with requirements of Saved **Policy TC9** and Emerging Local Plan **Policy DES2**

Conclusion

This planning application relates to 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.

The proposed development will bring three vacant units within St. George's Shopping Centre back into economic use; generate increased footfall and dwell time in St. George's Shopping Centre; and support the overall vitality and vibrancy of Gravesend Town 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 granted planning permission.

We trust that you have all of the necessary information to progress with this planning 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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