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Dear Sir/Madam

**Planning Applications for replacement of shopfront on like-for-like basis at Nationwide Building Society, 14 Market Square, Westerham, TN16 1AW**

Please find enclosed a planning application for the above proposal on behalf of our client Parker Technical Services.

The application comprises the following documents:

- Planning Permission form and Ownership Certificate
- Listed Building Consent form and Ownership Certificate
- Location Plan
- Elevations and Sections
- Photos of Site
- Planning Application Fee of £234.00

This letter provides a description of the proposed development and an assessment of the planning policy requirements of relevance to the application.

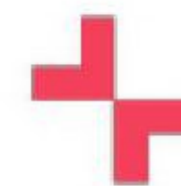
**Site Description & Proposed Development**

The site is located at 14 Market Square, Westerham. The property is a three-storey terraced property on a major commercial thoroughfare in the centre of the town. Surrounding uses are all town-centre uses include cafes, retail uses, restaurants, and pubs.

The site currently comprises a building society across three-storeys, with public access taken from Market Square on the front (south) elevation of the property. The ground floor is customer-facing, with a reception area, desks, and meeting rooms. The upper floors comprise staff areas, offices, and storage rooms.

The property is Grade II listed and is located within a Conservation Area.

The shopfront features of 14 Market Square have been destroyed following a vehicle raid on the shop. Having been assessed by building consultants, the remaining pieces have been found to be beyond repair or reinstatement. It has been possible to collect enough of the debris from the shopfront to provide a reconstruction of the design for the new features to be based on, though these pieces are so fragmented, missing, or damaged that full reconstruction using the pieces is not possible.



The proposal is to undertake a like-for-like replacement of the shopfront features that have been destroyed following a break-in at the property in October 2020. For the avoidance of doubt, the works to not relate to the upper fascia or other signage features on the building.

### **Design Statement**

In October 2020, the Nationwide branch was rammed by a vehicle in an attempt to break into the branch. This destroyed many features of the shopfront and damaged most of it beyond repair. The proposed works consist of like-for-like replacement of these shopfront features.

In the meantime, a temporary frontage has been erected for security purposes and to make the site safe for the public, with the branch operating a limited service at this time. The shopfront needs to be replaced for operational and security reasons.

The proposed replacement shopfront will be a like-for-like re-instatement of the previous shopfront. Samples of the timber profiling around the windows have been taken from the debris on the site, and analysed to enable an accurate reconstruction of the original features to be created. These reconstructions will be of profiled timber, sculpted to the previous style, and painted to match.

This process will ensure that no new features are introduced to the frontage of the property in terms of design, colour, and materials. These will all be restored to be consistent with the pre-established character of the building and the historic setting of the application site.

The attached drawings show details of the shopfront elevations as proposed. Like-for-like replacement is considered to be the most appropriate intervention in this case, due to the highly sensitive, historic nature of the location.

### **Heritage Statement**

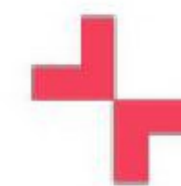
14 Market Square is part of Brunswick House, a Grade II Listed Building (List Entry Number: 1244119). Historic England's listing of the property reads as follows:

*“Late C18 or early C19 front of 2 storeys and attic, 4 windows. Tall slated mansard roof (front part now covered in felt) with 4 high, flat headed dormers. Painted brick with cornice band and parapet with coping gutter. Recessed replaced sash window on 1st floor. Ground floor left small modern shop window. At right altered shop front of mid C19 with sunk panel pilasters, wreaths in frieze above and moulded and modillioned cornice. Central 4-panel door with rectangular fanlight whose top angles are rounded.*

*Nos 12, 16, 18A, 18, 22, 24, 26 & 28 form a group.”*

As it is part of a Conservation Area as well as being Listed, this dual heritage status makes the building a valuable heritage asset in an attractive part of the town. Furthermore, the property is currently in active use as a building society. Retaining historic buildings in active use is highly desirable, not only so they continue to be active and functional components of the urban environment.

The site has been in active use as a Building Society branch for a number of years and is an established component of the local area. It is considered to be vitally important that it is restored to its previous condition for reasons relating to the visual attractiveness of the area and restoring the



heritage value of the town centre, as well as for security reasons relating to the building's function as a Building Society. The proposed works will allow the building to continue to be a functional part of the local environment for years to come.

### **Pre-Application Advice**

A request for Pre-Application Advice was submitted to Sevenoaks District Council in December 2020. This submission requested Council guidance on an early iteration of the proposal, including the replacement of the shopfront with redesigned features, replacement of fascia a new shopfront layout, and repositioning of features such as the door and ATM.

Feedback was received from Scott Fisher, Case Officer, which highlighted that the loss of features of historic or architectural significance through insensitive alteration was not acceptable in view of Policy EN4 and would not be supported by the Conservation Officer either.

Additionally, the feedback indicated that "The proposed alterations to the shop front including the change in design, size and colour would be seen in the context of the surrounding street scene", and that while these "could be acceptable", this would be subject to the impact on the Conservation Area and Listed Building.

Therefore, taking account of these comments and the difficulty of justifying the proposal in terms of it altering the appearance of the shopfront, the proposal was revised to be for like-for-like replacement. This is considered to address the concerns of the Conservation Officer in that there is no longer any "insensitive alteration", and the replacement of features (unavoidable due to the scale of damage) is purely like-for-like replacement, ensuring continuation of architectural and historical character.

The new scheme is considered to represent a more appropriate option in this regard, and has been chosen to ensure optimised heritage and conservation outcomes that preserve the character of the building and village setting.

The Pre-Application Advice response identified that the proposal would be considered against Policies EN1, EN4, and EN5 of the Allocations and Development Management Plan, and Policies LO8 and SP1 of the Core Strategy. The Westerham Village Design Statement is also understood to be applicable.

### **Planning Policy Assessment**

The current development plan for the site is the Sevenoaks Local Plan, which comprises the Core Strategy, adopted February 2011, and the Allocations and Development Management Plan, adopted in February 2015. The Proposals Map identifies the site as being located within a Conservation Area and a Town and Local Centre, subject to policies EN4 and TLC4 respectively.

#### *Core Strategy*

As relevant to this proposal, **Policy LO8 – The Countryside and the Rural Economy** states that:

*"... The countryside will be conserved and the distinctive features that contribute to the special character of its landscape and its biodiversity will be protected and enhanced where possible. The distinctive character of the Kent Downs and High Weald Areas of Outstanding Natural Beauty and their settings, will be conserved and enhanced.*



*Particular regard will be given to the condition and sensitivity of the landscape character and securing the recommended landscape actions in the proposed SPD to ensure that all development conserves and enhances local landscape character and that appropriate mitigation is provided where damage to local character cannot be avoided. ...”*

The proposal to undertake a like-for-like replacement of the shopfront features at the application site is not considered to be of a significant enough scale to impact on the setting of the countryside or the Areas of Outstanding Natural Beauty (AONBs). In any case, the proposal will preserve the local character of its surroundings by being identical to the established shopfront appearance at this location, and introducing no new features or elements that would affect the character or setting. In this sense, the proposal is considered to be compliant with Policy LO8.

**Policy SP1 – New Development and Conservation** states that:

*“All new development should be designed to a high quality and should respond to the distinctive local character of the area in which it is situated. Account should be taken of guidance adopted by the Council in the form of Kent Design, local Character Area Assessments, Conservation Area Appraisals and Management Plans, Village Design Statements and Parish Plans. In rural areas account should be taken of guidance in the Countryside Assessment and AONB Management Plans.*

*In areas where the local environment lacks positive features new development should contribute to an improvement in the quality of the environment.*

*New development should create safe, inclusive and attractive environments that meet the needs of users, incorporate principles of sustainable development and maintain and enhance biodiversity.*

*The District’s heritage assets and their settings, including listed buildings, conservation areas, archaeological remains, ancient monuments, historic parks and gardens, historic buildings, landscapes and outstanding views will be protected and enhanced.”*

The proposed development takes cognisance of the setting in a Conservation Area and as a Listed Building, and ensures that these assets are preserved by proposing a like-for-like replacement of the shopfront features. This will ensure that the pre-existing appearance of the property and the location is maintained and preserved. No new features or design elements are proposed to be introduced. The proposal is therefore considered to be responsive to local character as it is a reinstatement of the features previously present at the site. Therefore, the proposed development is in accordance with Policy SP1.

*Allocations and Development Management Plan (ADMP)*

As relevant to this proposal, **Policy EN1 – Design Principles** states that:

*“Proposals which would create high quality design and meet the following criteria will be permitted:*

- a) the form of the proposed development would respond to the scale, height, materials and site coverage of the area; ... .”*

The proposal is for the like-for-like replacement of shopfront features that have been destroyed by criminal activity. The new features will use exactly the same styles, colours, and materials as the



previous shopfront features. This is considered to accord with the above provision of Policy EN1 in that the proposal will use precisely the same design principles as the previous shopfront features.

**Policy EN4 – Heritage Assets** states that:

*“Proposals that affect a Heritage Asset, or its setting, will be permitted where the development conserves or enhances the character, appearance and setting of the asset.”*

*Applications will be assessed with reference to the following:*

- a) the historic and/or architectural significance of the asset;*
- b) the prominence of its location and setting; and*
- c) the historic and/or architectural significance of any elements to be lost or replaced.*

*Where the application is located within, or would affect, an area or suspected area of archaeological importance an archaeological assessment must be provided to ensure that provision is made for the preservation of important archaeological remains/findings.*

*Preference will be given to preservation in situ unless it can be shown that recording of remains, assessment, analysis report and deposition of archive is more appropriate.”*

The proposal is to replace the previous features with a new shopfront consisting of identical materials, colours, and design features. While the architectural and historical features being replaced are recognised to be of significant value, they are beyond repair following an act of vandalism and cannot be restored sufficiently enough to be re-used on the shopfront. Fragments of the features have been collected and from these the design has been copied and replicated anew. This will ensure continuity of all aspects of the shopfront that contribute to the historic and architectural significance and character of both the building itself and the Conservation Area.

In this sense the proposal is considered to accord with Policy EN4 in that the character, appearance, and setting of the historic environment are being preserved.

**Policy EN5 – Landscape** states that:

*“The Kent Downs and High Weald Areas of Outstanding Natural Beauty and their settings will be given the highest status of protection in relation to landscape and scenic beauty. Proposals within the AONB will be permitted where the form, scale, materials and design would conserve and enhance the character of the landscape and have regard to the relevant Management Plan and associated guidance.*

*Proposals that affect the landscape throughout the District will be permitted where they would:*

- a) conserve the character of the landscape, including areas of tranquillity; and*
- b) where feasible help secure enhancements in accordance with landscape actions in accordance with the Sevenoaks Countryside Assessment SPD.”*

The proposal is considered to be of too small a scale to have an impact on the landscape or scenic beauty of the AONBs. Despite this, the proposal is still considered to accord with the principles of Policy EN5 in that it utilises matching scale, materials, colours, and design, as the previous shopfront features. The proposal is therefore compliant with Policy EN5.



**Policy TLC4 – Neighbourhood and Village Centres** covers the site due to its inclusion in Appendix 8 of the plan. This Policy relates to Changes of Use and new uses in Neighbourhood and Village Centres. As there is no change of use proposed to this property as part of the proposal this policy is not considered to be of relevance and therefore does not apply to this proposal.

#### *Westerham Village Design Statement*

The Westerham Village Design Statement (WVDS) was adopted in April 2019. The document sets out a number of Design Guidelines for new development in Westerham, each following a general theme. In terms of Landscape & Setting, Guideline LS8 is applicable, which states that *“Planning policies to protect Conservation Areas and Listed Buildings should be strictly applied.”*

The relevant policies for this have been reviewed in detail above, and is considered that the proposal complies with them fully.

The Design Guidelines on Settlement Characteristics includes SC1 and SC12. Respectively, these state that:

*“Westerham’s unique historic setting contributes greatly to its local distinctiveness and will be protected from inappropriate development. Any proposed development shall retain and enhance the distinctive character of the town” and “New development should be designed and sited to ensure that Heritage Assets and their settings are protected and enhanced”.*

For the reasons given previously in this letter, it is considered that the proposed replacement of the shopfront contributes to both the historic character of the town by ensuring the continuation of the historic design of the shopfront features, and using colours and materials previously established on the shopfront. This will have the benefit of protecting the heritage value of the application property and its setting.

On the topic of Buildings & Materials, Guideline BM1 is applicable, which states, inter alia, *“new development should respond to the scale, height, materials and site coverage of the immediate locality”*

As discussed above, the proposal utilises identical materials to the previous shopfront features that have been destroyed. It is therefore considered that these respond to the immediate locality as they are replacements of a previously present type of material (timber).

There are no further provisions or guidelines of the WVDS that are considered to be relevant to the proposal. Therefore, it is considered that the proposed development accords with all relevant provisions of the Development Plan as demonstrated above.

#### **Summary**

This application is for Planning Permission and Listed Building Consent for the replacement of shopfront features at the Nationwide Building Society, 14 Market Square, Westerham, TN16 1AW. The property was subject to a break-in attempt in October 2020 during which a vehicle was driven into the shopfront. This destroyed the shopfront elements beyond repair, and a temporary shopfront was erected for security purposes and to allow the shop to continue to operate in a limited capacity. The proposal is to replace this shopfront on a like-for-like basis with features designed to match the original shopfront elements identically in terms of material, colour, and design. This has been possible after collecting fragments of the original shopfront from the proposal site.



An early iteration of the proposal was submitted to Sevenoaks District Council as part of a pre-application advice process. This featured a revised shopfront design with new colours and features, and the repositioning of some key elements such as the main door and the ATM. Feedback from Sevenoaks District Council planners suggested this was not a preferable option and would likely not be supported. As a result, the proposal has been revised to facilitate a like-for-like replacement of the shopfront so that the historic and architectural character of the building and the setting will be preserved.

The proposal has been considered in respect of all relevant policies of the Development Plan and is considered to accord with these. The proposed works will ensure there is no diminishment to the building's appearance and will allow the continued operation of this listed building, while also maintaining the historical character and established features of the Conservation Area by reinstating the shopfront's appearance on a like-for-like basis.

The works accord with the relevant provisions of planning policy and make a positive contribution to the heritage asset and the Conservation Area. It is therefore considered that consent should be granted for Planning Permission and Listed Building Consent for this proposal.

I trust that the above and enclosed are acceptable. If you have any questions or require any further information about this proposal please do not hesitate to contact me on the details below.

Yours faithfully



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