

Newport City Council

Supplementary Planning Guidance

**SECURITY MEASURES FOR SHOP
FRONTS AND COMMERCIAL
PREMISES**



Adopted August 2015



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1.0 GENERAL CONSIDERATIONS

- 1.1 The purpose of this Supplementary Planning Guidance is to provide advice to businesses on how premises can be secured to a satisfactory level whilst maintaining a high quality environment that people want to shop in and can feel proud of.
- 1.2 The Council realises that commercial premises are at risk of break-ins and vandalism and that it is sometimes necessary to provide additional security measures. External shutters are often favoured by businesses as a quick and cost effective method of providing this. External shutters and their housings require planning permission when installed on commercial premises and will also require Listed Building Consent if installed on a Listed Building.
- 1.3 Shutters are not always acceptable in planning terms and if you are intending to install them you should contact the Council's Planning Section for advice beforehand. You should always consider security measures other than shutters in the first instance. For example toughened glass or internal shuttering (which in many instances will not need planning permission, see Section 06, Internal Shutters and Grilles). Gwent Police can offer advice on 'Designing Out Crime' and should be consulted on the best way to secure your business especially if you have been the victim of a crime¹.
- 1.4 Other solutions may involve the provision of stall risers (the area of wall beneath a shop window) with reduced window areas above. Windows elevated above ground level are less easy for thieves or vandals to break and smaller and less prominent areas of shuttering would be needed to protect such windows. Works that alter the appearance of a shop front would also need planning permission.

¹ See Paragraph 9.3 for contact details

1.5 However if you decide external shuttering is the best solution for you then you should take the advice in this SPG into account before applying for planning permission. You should not order or install any shutters before you have planning permission.

1.6 You should minimise the area of shuttering installed, for example covering the window but not the solid parts of the shopfront. Unnecessarily large and prominent shutters will be refused permission on design grounds.

1.7 If you make a planning application to provide or retain a shutter it is essential that you provide:

- High quality drawings at appropriate (1:50) scale showing the shutter, its housing and any guide rails. You will need a drawing showing the shutter open and a drawing showing the shutter closed. The drawings should show how the shutter relates to the whole building and not just the ground floor. You will also need a drawing showing a section through the shutter and its housing so it is clear how far the housing will stick out from the shop front.
- Your Design & Access Statement (DAS) which will form part of your application should explain why the shutter and its housing and guide rails are an appropriate security solution for your premises and preferable to other security solutions available such as those mentioned in Paragraphs 1.3 & 1.4.
- Information on how the shutter and its housing and guide rails will relate to the building and the wider area should be included in your DAS. General guidance on writing a DAS can be found on the Council's website at:

http://www.newport.gov.uk/_dc/index.cfm?fuseaction=planning.developmentcontrol&contentid=CONT414603

1.8 Not all shutters are the same and some types are unacceptable, see Table 01, pages 4 & 5. In this guidance note the terms used are:

- Solid Shutter – completely solid and lets no light through.
- Pinhole shutter – looks solid from a distance but has a lot of tiny holes or perforations in it.
- Punched or Letter Box shutter – semisolid but with rectangular ‘letter box’ sized holes punched out of it.
- Grille or Lattice Shutter – the most open type.

1.9 The presence of unacceptable shutter types near your business will not be a justification for further unacceptable shutters which will have a poor impact on the appearance of your premises or the street in general.

1.10 **Guidance Note SM1 (adverse visual impact):**

Shutters, their housing and guiderails should be designed to have the minimum possible adverse impact on the appearance of the premises, the whole building and the street in general.

1.11 This guidance sets out which shutter types are acceptable and where each type is acceptable. Tighter levels of control apply to Listed Buildings (Section 2) and in Conservation Areas (Section 3). In some cases the Council will allow shutter types that would normally be unacceptable if the applicant can show there are exceptional circumstances (Section 8).

Table 01: Shutter Types

Solid Shutter		
Pinhole Shutter		

Punched
Shutter (letter
box)



Grille
(lattice)



2.0 POLICY CONTEXT

2.1 National policy

2.1.1 *Planning Policy Wales (Edition 7, July 2014)*

This document sets out the land-use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs). Procedural advice is given in circulars and policy clarification letters.

2.1.2 Chapter 3: Making and Enforcing Planning Decisions

2.1.3 Paragraph 3.1.7 states the following:

“The planning system does not exist to protect the private interests of one person against the activities of another. Proposals should be considered in terms of their effect on the amenity and existing use of land and buildings in the public interest. The Courts have ruled that the individual interest is an aspect of the public interest, and it is therefore valid to consider the effect of a proposal on the amenity of neighbouring properties. However, such consideration should be based on general principles, reflecting the wider public interest (for example a standard of “good neighbourliness”), rather than the concerns of the individual.”

2.1.4 Paragraph 3.4.3 states the following:

“When a new building is proposed, an existing building is being extended or altered, or a change of use is proposed, developers should consider the need to make it accessible for all those who might use the building. The appropriate design and layout of spaces in, between and around buildings, including parking provision and movement routes, is particularly important in ensuring good accessibility. The preparation of access audits may be useful in any assessment of accessibility.”

2.1.5 Paragraph 3.4.5 states the following:

“Historic buildings can present particular accessibility difficulties. The provision of access suitable for all should be encouraged wherever the installation of such access would not unduly affect the special character of an historic building. When a new extension is designed for a building of special architectural or historic interest it should be fully accessible. Access audits may be useful in assessing the accessibility of historic buildings.”

2.1.6 Chapter 6: Conserving the Historic Environment

2.1.7 Paragraph 6.1.1 states the following:

“[Some of the] Welsh Government’s objectives in this field [that is, conservation] are to:

- Preserve or enhance the historic environment, recognising its contribution to economic vitality and culture, civic pride and the quality of life, and its importance as a resource for future generations;
- Ensure that the character of historic buildings is safeguarded from alterations, extensions or demolition that would compromise a building’s special architectural and historic interest; and
- Ensure that conservation areas are protected or enhanced, while at the same time remaining alive and prosperous, avoiding unnecessarily detailed controls over businesses and householders.”

2.1.8 Paragraph 6.5.8 states the following:

“There should be a general presumption in favour of the preservation of listed buildings.”

2.1.9 Paragraph 6.5.9 states the following:

“Where a development proposal affects a listed building or its setting, the primary material consideration is the statutory requirement to have special regard to the

desirability of preserving the building, or its setting, or any features of special architectural or historic interest which it possesses.”

2.1.10 Paragraph 6.5.17 states the following:

“Should any proposed development conflict with the objective of preserving or enhancing the character or appearance of a conservation area, or its setting, there will be a strong presumption against the grant of planning permission. In exceptional cases, the presumption may be overridden in favour of development deemed desirable on the grounds of some other public interest. The Courts have held that the objective of preservation can be achieved either by development which makes a positive contribution to an area’s character or appearance, or by development which leaves character and appearance unharmed.”

2.1.11 Chapter 10: Planning for Retailing and Town Centres

2.1.12 Paragraph 10.1.1 states the following:

“[Some of the] Welsh Government’s objectives for retailing and town centres are to:

- Secure accessible, efficient, competitive and innovative retail provision for all the communities of Wales, in both urban and rural areas; and
- Enhance the vitality, attractiveness and viability of town, district, local and village centres.”

2.1.13 *Technical Advice Note 12: Design (July 2014)*

2.1.14 Paragraph 2.2 states the following:

“The Welsh Government is strongly committed to achieving the delivery of good design in the built and natural environment which is fit for purpose and delivers environmental sustainability, economic development and social inclusion, at every scale throughout Wales — from householder extensions to new mixed use communities.”

2.2 **Local policy**

2.2.1 *Newport Local Development Plan 2011 – 2026 (Adopted Plan, January 2015)*

2.2.2 Policy CE5 (Locally Listed Buildings and Sites) states the following:

“Buildings and sites of local significance for their architectural or historic interest will be included on a local list and should be protected from demolition or inappropriate development.”

2.2.3 Policy CE7 (Conservation Areas) states the following:

“Development within or adjacent to conservation areas will be required to:

- i) Be designed to preserve or enhance the archaeological or historic character or appearance of the conservation area, having regard to the conservation area appraisal where appropriate.
- ii) Avoid the removal of existing historic features, including traditional shopfronts and joinery.
- iii) Use materials which are traditional, or appropriate to their context.
- iv) Complement or reflect the architectural qualities of nearby buildings which make a positive contribution to the character of the area.
- v) Pay special attention to the settings of buildings, and avoid the loss of any existing domestic gardens and open spaces which contribute to the character of the area.
- vi) Avoid adverse impact on any significant views, within, towards and outwards from the conservation area.”

2.2.4 Policy GP2 (General Amenity) states the following:

“Development will be permitted where, as applicable:

- i) There will not be a significant adverse effect on local amenity, including in terms of noise, disturbance, privacy, overbearing, light, odours and air quality;
- ii) The proposed use and form of development will not be detrimental to the visual amenities of nearby occupiers or the character or appearance of the surrounding area;
- iii) The proposal seeks to design out the opportunity for crime and antisocial behaviour;
- iv) The proposal promotes inclusive design both for the built development and access within and around the development;
- v) Adequate amenity for future occupiers.”

2.2.5 Policy GP6 (Quality of Design) states the following:

“Good quality design will be sought in all forms of development. The aim is to create a safe, accessible, attractive and convenient environment. In considering development proposals, the following fundamental design principles should be addressed:

- i) Context of the site: all development should be sensitive to the unique qualities of the site and respond positively to the character of the area;
- ii) Access, permeability and layout: all development should maintain a high level of pedestrian access, connectivity and laid out so as to minimise noise pollution;
- iii) Preservation and enhancement: where possible development should reflect the character of the locality but avoid the inappropriate replication of neighbouring architectural styles. The designer is encouraged to display creativity and innovation in design;
- iv) Scale and form of development: new development should appropriately reflect the scale of adjacent townscape. Care should be taken to avoid over-scaled development;

- v) Materials and detailing: high quality, durable and preferably renewable materials should be used to complement the site context. Detailing should be incorporated as an integral part of the design at an early stage;
- vi) Sustainability: new development should be inherently robust, energy and water efficient, flood resilient and adaptable, thereby facilitating the flexible re-use of the building. Where existing buildings are present, imaginative and sensitive solutions should be sought to achieve the re-use of the buildings.”

2.2.6 Policy SP9 (Conservation of the Natural, Historic and Built Environment) states the following:

“The conservation, enhancement and management of recognised sites within the natural, historic and built environment will be sought in all proposals.”

3.0 LISTED BUILDINGS

3.1 External security shutters will never be acceptable on Listed Buildings.

3.2 When considering a Listed Building consent application, by law the Council must show “special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”

3.3 If a proposal is detrimental to the architectural or historic interest of a listed building then it will not be acceptable and any application submitted will be refused. External shutters are not acceptable.

3.4 You should remember that the inside of a Listed Building is also listed – internal security measures are highly likely to need Listed Building consent just as external measures do.

3.5 Important points to consider:

- If you are not sure whether your building is listed then you should contact the planning section for advice.
- Carrying out unauthorised works to a Listed Building is a criminal offence and you could be prosecuted – if in doubt check!
- You should contact the Council’s Building Conservation Officer who will be able to advise on acceptable security measures for Listed Buildings. See Section 9.0 for contact details.

3.6 **Guidance Note SM2 (external shutters on listed buildings):**

External shutters are never acceptable on listed buildings.

4.0 **CONSERVATION AREAS**

4.1 Newport has 15 Conservation Areas including most of the city centre. In Conservation Areas, by law “special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area”. This means that the Council at the least, has to make sure that development in conservation areas does not cause harm to that conservation area. Preferably development should improve the conservation area.

4.2 You should check with the Council’s Planning Section or online to find out if your business is in a Conservation Area if you are not sure.

4.3 In practical terms this means that applications in Conservation Areas will usually need to be of a higher design standard than normal and should pay attention to the characteristics of the area. Many of Newport’s traditional shopping areas date back to Victorian times and are often well preserved. As a result highly prominent shutter types such as solid, pinhole and punched (letter box) type shutters will not be acceptable.

4.4 **Guidance Note SM3 (conservation areas):**

Highly prominent shutter types such as solid, pinhole and punched (letter box) type shutters will not be acceptable within or near to conservation areas.

5.0 THE CITY CENTRE AND THE DISTRICT CENTRES

5.1 The City Centre and the District Centres are the main shopping areas in Newport and they are identified in the Development Plan. Solid and pinhole shutters are not normally acceptable in these areas. It is important to remember that much of the City Centre and some parts of some District Centres are also Conservation Areas where control on shutters is tighter and the punched (letter box) type is also unacceptable.

5.2 Guidance Note SM4 (solid/pinhole shutters, the city centre and district centres):

In normal circumstances, solid and pinhole shutters are not acceptable in the City or District Centres.

6.0 SHUTTER HOUSING AND GUIDE RAILS

- 6.1 Shutter housing and guiderails should be integrated as much as possible into the shopfront of the building which will minimise their impact on the appearance of the building and the street in general. This will be especially true in the City's Conservation Areas where the need for good design is especially important. In your design you should achieve the following:
- 6.2 If the shutter is being added to an existing shopfront you should minimise the forward projection of the housing and guiderails. Ideally the housing and guiderails should not project further forward than the shopfront itself. If this is not possible you will be expected to explain why in your planning application as part of the Design and Access Statement.
- 6.3 Wherever possible the shutter housing and guiderails should be built into the shopfront so they are hidden. It may be possible to integrate the housing within the signage on the shopfront which normally makes the shopfront appear less 'busy' and more in keeping with traditional shopping streets.
- 6.4 The housing and guiderails should be colour coated to match the rest of the shopfront and the shutter. Planning conditions will normally require this to be done if it isn't part of your original design. Bare metal will not be acceptable.
- 6.5 Think about the appearance of the building as a whole and the appearance of the street. A shutter scheme that takes into account the appearance of the whole building and the character of the area is more likely to be acceptable than one which has been done with little thought.

6.6 Bulky and/or prominent shutter housing and guiderails will be a reason to refuse planning permission for a security shutter unless it can be shown in your DAS that this was the only practical solution.

6.7 The best schemes integrate security measures into the shopfront. If you are installing a new shopfront think about security measures and signage at the same time.

6.8 **Guidance Note SM5 (housing and guiderails):**

Housing and guiderails should not project forward of the existing shopfront unless it can be demonstrated this was the only practical solution.

7.0 INTERNAL SHUTTERS AND GRILLES

- 7.1 Due to their proximity to the shop window and resultant visibility shutters fitted to the interior of your business may require planning permission if they have a material affect upon the external appearance of the building.
- 7.2 Where you wish to install internal shutters please contact the Planning Department for further advice.
- 7.3 Internal shutters or grilles are highly likely to need Listed Building Consent if installed in a Listed Building.

8.0 SHUTTER TYPES

8.1 Shutters come in a variety of types. The Council favours some types over others. Table 02 shows the acceptability of shutter types in different areas of the City. In general terms the more solid looking a shutter is, then the less acceptable it is. This is because solid looking shutters prevent views into and out of properties which can facilitate crime and also leads to a forbidding fortress like appearance in the street. This can actually increase fear of crime and lead to shopping areas losing vitality as they become less attractive to shoppers. Security is not the sole issue for shopkeepers who need to be aware of the need to maintain a high quality and attractive environment to attract customers.

8.2 If you are intending to install an unacceptable shutter type (see Table 02) then it will not receive planning permission unless you can demonstrate an exceptional need for the shutter proposed (or installed). Some shutter types will never be acceptable in certain areas, see Table 03.

8.3 Guidance Note SM6 (solid shutters and industrial areas):

Solid shutters are only acceptable in industrial areas and nowhere else.

9.0 EXCEPTIONAL NEED

9.1 In exceptional circumstances, pinhole type shutters will be accepted in most places but never on a Listed Building or in (or near to) a Conservation Area. The exceptional need criteria are:

- Your premises have been broken into via the window / door that is proposed to be shuttered at least twice in the 12 month period preceding the application for the shutter (or its installation if you are trying to retain the shutter); or
- Your premises have been vandalised to the extent the window / door to be shuttered has had to be replaced at least twice in the 12 month period preceding the application for the shutter (or its installation if you are trying to retain the shutter); and
- All instances of break-in or vandalism will always need to be documented by crime reports, insurance claims or receipts / invoices for repair of damage and must clearly relate to the window/door to be shuttered.

9.2 Vandalism that does not result in the breakage of glazing, for example graffiti will not justify unacceptable shutter types. It should be remembered that solid shutters provide a ‘canvas’ for graffiti and will not be a solution for this problem.

9.3 Even if exceptional circumstances are shown external shutters of any type will not be acceptable in Listed Buildings.

9.4 Punched (Letter Box) shutters will not be acceptable in or near Conservation Areas even under exceptional circumstances.

9.5 Pinhole Shutters will only be acceptable outside industrial areas if exceptional circumstances are shown. They will never be acceptable on Listed Buildings or in (or near) Conservation Areas.

9.6 See Table 03 for a summary of acceptability of shutter type by area if exceptional circumstances have been shown.

9.7 **Guidance Note SM7 (pinhole shutters):**

Pinhole shutters are only acceptable outside industrial areas if exceptional circumstances have been shown. They are never acceptable on Listed Buildings or in, or near to Conservation Areas.

10.0 FURTHER ADVICE & CONTACTS

10.1 For general advice contact:

Development Services

Regeneration, Investment and Housing

Newport City Council

Civic Centre

Newport

NP20 4UR

01633 656656

planning@newport.gov.uk

10.2 For advice on Listed Buildings and Conservation Areas contact:

Historic Buildings Conservation Officer

Development Services

Regeneration, Investment and Housing

Newport City Council

Civic Centre

Newport

NP20 4UR

01633 656656

planning@newport.gov.uk

10.3 For Police advice on security contact:

The Community Safety Department (Secured by Design)

Maindee Police Station

81 Chepstow Road

Newport

NP19 8BY

01633 247 925 / 926

communitysafety@gwent.pnn.police.uk

- 10.4 A record of Listed Buildings in Newport can be found at the web address below, please note the list is accurate as of 27 July 2011 but it can change so it is always advisable to check with the Council's Conservation Officer:

http://www.newport.gov.uk/xpedio/groups/public/documents/web_text/n_064374.pdf

- 10.5 Information on Newport's Conservation Areas including where they are can be found at the web address below but it can change so it is always advisable to check with the Council's Conservation Officer:

http://www.newport.gov.uk/_dc/index.cfm?fuseaction=planning.conservation&contentid=CONT295610

Table 02: Shutter Types, Acceptability by Area (No Exceptional Circumstances)

	Town centre (not conservation area)	District centre (not conservation area)	Conservation areas (or near to)	Listed building	Industrial areas	Everywhere else
Solid Shutter	x	x	x	x	✓	x
Pinhole Shutter	x	x	x	x	✓	x
Punched Shutter / Letter box type	✓	✓	x	x	✓	✓
Grille/Lattice Shutter	✓	✓	✓	x	✓	✓

Key



Unacceptable



Acceptable

Table 03: Shutter Types, Acceptability by Area (Exceptional Circumstances shown)

	Town centre (not conservation area)	District centre (not conservation area)	Conservation areas (or near to)	Listed building	Industrial areas	Everywhere else
Solid Shutter	x	x	x	x	✓	x
Pinhole Shutter	✓	✓	x	x	✓	✓
Punched or Letter box Shutter	✓	✓	x	x	✓	✓
Grille/Lattice Shutter	✓	✓	✓	x	✓	✓



Unacceptable



Acceptable

Table 04: Other documents you should look at

	Listed Buildings	Conservation Areas	Town Centre/District Centres	General Considerations (all areas)
National Guidance Planning Policy Wales (Edition 4)	#4.10.10 #6.1.1 #6.5.8 - 6.5.11	#6.1.1 #6.5.17	#10.1.1	#4.10
National Guidance (Technical Advice Notes)	TAN 7 - #18 TAN 12 - #5.6 TAN 12 - #5.17.2	TAN 7 - #16-17 TAN 12 - #5.6 TAN 12 - #5.17.2	TAN 12 - #5.17.2	Technical Advice Note 7: Outdoor Advertisement Control Technical Advice Note 12: Design
Newport UDP	Policy CE15 Policy CE18	Policy CE20 Policy CE21 Policy CE24	Policy CE42	Policy SP2 Policy CE32 Policy CE38 Policy CE41 Policy CE42 Policy CE43
Supplementary Planning Guidance (Newport)	Repairs and Alterations to Listed buildings	Town Centre Shopfront Policy – A Design Guide	Town Centre Shopfront Policy – A Design Guide	
Application Advice (Newport)				Advisory Note: Design & Access Statements (DAS)