# The Rushmoor Plan: Shop Front Design Supplementary Planning Document (SPD)

## **Consultation Statement**

Regulation 12 Town and Country Planning (Local Development) (England) Regulations 2012

## Persons consulted when preparing the supplementary planning document

The Shop Front Design SPD was subject to public consultation for a period of 6 weeks between 20<sup>th</sup> October 2014 and 1<sup>st</sup> December 2014. Copies of the draft document and supporting information (namely a Strategic Environmental Assessment Determination and the Statement of Matters and Availability (see Appendix 1)) were made available to view at the following locations during opening hours:

- Rushmoor Borough Council Offices
- Aldershot Library (see letter to Librarian in Appendix 2)
- Farnborough Library (see letter to Librarian in Appendix 2)

The SPD and supporting information was also made available to view online at <a href="https://www.rushmoor.gov.uk/spds">www.rushmoor.gov.uk/spds</a> (see Appendix 3 and Appendix 4).

Representations were invited via post or via email.

#### Consultation letters and emails

The Council notified all registered members on the Rushmoor Local Plan consultation database. The database covers a wide range of stakeholders including local residents, businesses, statutory bodies such as English Heritage and civic groups such as the Farnborough Society and Aldershot Society. In total, there are approximately 900 contacts on the database. The majority of members were contacted via email (see Appendix 5) and those without an email address were contacted via post (see Appendix 6).

#### Documents available on the Council's website

Copies of the draft SPD and the Strategic Environmental Assessment Determination were made available to view/download on the Council's website at <a href="www.rushmoor.gov.uk/spds">www.rushmoor.gov.uk/spds</a> and <a href="www.rushmoor.gov.uk/article/7771/Draft-shop-front-design-guide-supplementary-planning-document-SPD">www.rushmoor.gov.uk/article/7771/Draft-shop-front-design-guide-supplementary-planning-document-SPD</a>.

### Press Release

A press release was published by Rushmoor Borough Council on the 17<sup>th</sup> September 2014 (see Appendix 7) following approval from Cabinet to undertake public consultation. The press release was circulated to the following local newspapers:

- Aldershot News and Mail
- Farnham Herald
- Basingstoke Gazette
- Hampshire Chronicle
- Surrey Advertiser
- Hampshire Independent
- Surrey and Hampshire News

## Summary of the main issues raised by those persons

The Council received a total of 7 responses to the consultation These comments are presented in full within Appendix 8. The key issues raised were:

- Concerns over who is qualified to determine what is a 'good quality traditional shop front';
- Concerns that a precedent has already been set for poor shop fronts and it may not be possible to rectify this;
- Inconsistency between Figure 3 and the written text of the document regarding hanging signs;
- The section on listed buildings/heritage assets could be strengthened;
- Concerns that some of the design principles proposed were inappropriate and unachievable.

## How those issues have been addressed in the supplementary planning document

The Officer comments relating to these concerns and how they have been addressed in the final version of the SPD can be found in Appendix 8.

## Appendix 1 Statement of SPD Matters and Availability

The Rushmoor Plan: Draft Shop Front Design Supplementary Planning Document (SPD)

#### Statement of SPD Matters and Availability

Regulation 12 Town and Country Planning (Local Development) (England) Regulations 2012

Title: Draft Shop Front Design Supplementary Planning Document

Area Covered: Rushmoor Borough

**Subject Matter:** The purpose of this SPD is to provide design guidance on the alteration or installation of shop fronts and shop signage in order to maintain or raise the design quality of these features of the townscape.

Representation Period: 20 October 2014 - 1 December 2014

Copies of the draft documents and the supporting information are available to view at:

- Rushmoor Borough Council Offices between 8:30am and 5pm Monday to Thursday, and between 8:30am and 4:30pm Friday
- Aldershot Library, 109 High Street, Aldershot, Hampshire GU11 1DQ at the following times:
  - o Monday 9.30am 7pm
  - Tuesday 9.30am 5pm
  - o Wednesday 9.30am 5pm
  - o Thursday 9.30am 7pm
  - o Friday 9.30am 5pm
  - o Saturday 9.30am 4pm
  - o Sunday 10am 2pm
- Famborough Library, Pinehurst, Farnborough, GU14 7JZ at the following times:
  - o Monday 9.30am 7pm
  - o Tuesday 9.30am 6pm
  - o Wednesday 9.30am 6pm
  - Thursday 9.30am 6pm
     Friday 9.30am 7pm
  - o Saturday 9.30am 5pm
- Online at <u>www.rushmoor.qov.uk/spds</u>

Representations to be sent to:

Planning Policy Team, Rushmoor Borough Council, Council Offices, Farnborough Road, Farnborough, Hants GU14 7JU

Or by email to plan@rushmoor.gov.uk

Adoption Notification: If you wish to be notified of the adoption of this SPD, please request this as part of your submissions.

## **Appendix 2 Letter to Librarian**



Govinni, Offices, Familinough Road, Famboraugh, Lams, GU14 7JU Tel: (01252) 398 399

Wede det www.rushningsgov.iik

Your reference

Contact: Nick Irvine

Our reference

Telephone: 01252 398739

Email: plan@rushmoor.gov.uk

Date: 16 October 2014

Dear Librarian,

#### Draft Shop Front Design Guide Supplementary Planning Document (SPD) consultation

In October 2011, Rushmoor Borough Council adopted a key planning document known as the Core Strategy. This sets out a number of overarching planning policies that will guide future development in the Borough up to 2027. To help to implement some of these planning policies, the Council has produced further guidance for consultation on shop front design as set out below.

#### Shop Front Design Guide SPD

The Shop Front Design Guide SPD provides design guidance on the alteration or installation of shop fronts and shop signage in order to maintain or raise the design quality of these features of the townscape. It applies to all buildings in Use Classes A1 (shops), A2 (financial and professional services), A3 (restaurants and cafes), A4 (drinking establishments) and A5 (hot food take-aways).

The guidance will be used by Rushmoor Borough Council in assessing planning applications for shop fronts and shop signage and the Council will promote its use as a guide for shop owners, architects and planning agents.

As part of the consultation process, the Council is required to put the document on public display. Accordingly, please find enclosed two copies of the consultation document for viewing purposes only. The consultation period runs until the 1st December 2014.

Yours faithfully,

11/1/12

Nick Irvine

Senior Planning Officer

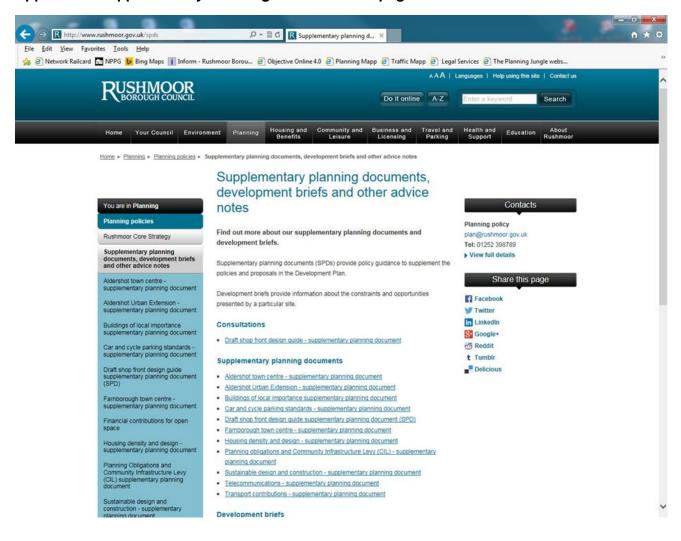
Planning Policy and Conservation

Chief Executive Andrew Lloyd . Director of Resources Inn Herison . Director of Community & Emifronment David Cubic

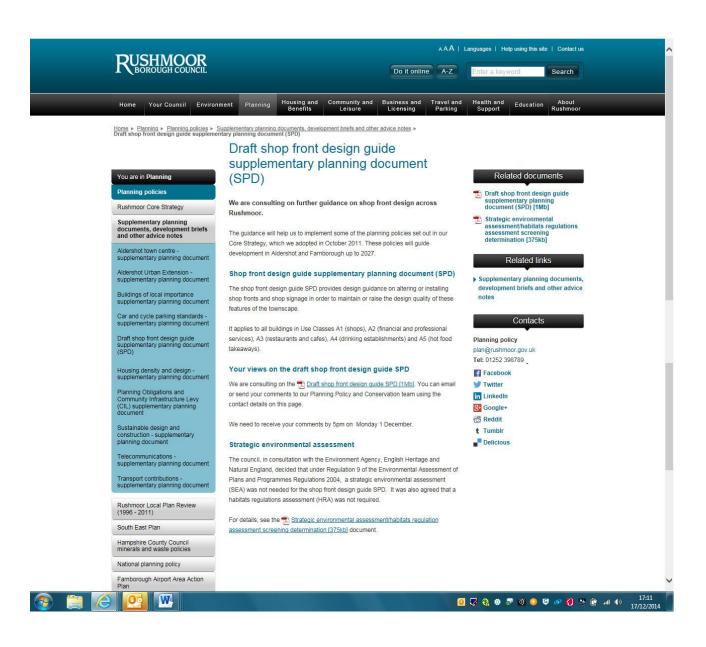
Email: customereervices@rushmoor.gov.uk

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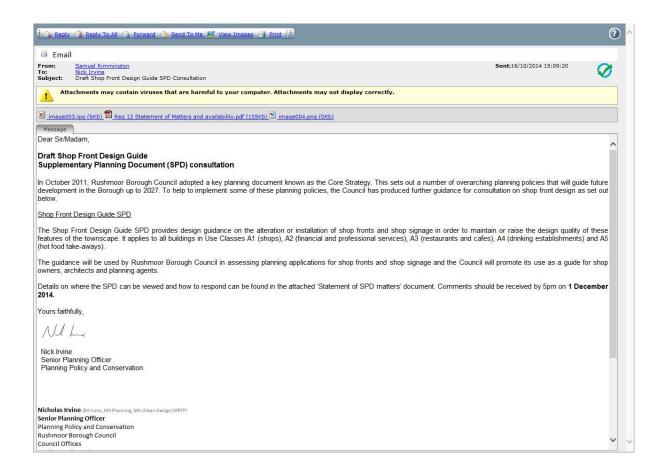
## **Appendix 3 Supplementary Planning Document webpage**



## Appendix 4 Draft Shop Front Design Guide SPD consultation webpage



## **Appendix 5 Email to consultees**



## **Appendix 6 Letter to consultees**



Govinni, Offices, Familinough Road, Famborough, Lants, GU14 7VU Tel: (01252) 398 399

Website: www.rushning.gov.iik

Your reference Contact: Nick Irvine

Our reference Telephone: 01252 398739

Email: plan@rushmoor.gov.uk

Date: 09 October 2014

Dear Sir/Madam,

#### Draft Shop Front Design Guide Supplementary Planning Document (SPD) consultation

In October 2011, Rushmoor Borough Council adopted a key planning document known as the Core Strategy. This sets out a number of overarching planning policies that will guide future development in the Borough up to 2027. To help to implement some of these planning policies, the Council has produced further guidance for consultation on shop front design as set out below.

#### Shop Front Design Guide SPD

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The guidance will be used by Rushmoor Borough Council in assessing planning applications for shop fronts and shop signage and the Council will promote its use as a guide for shop owners, architects and planning agents.

Details on where the SPD can be viewed can be found in the attached 'Statement of SPD matters' document. Please send any comments that you may have to Nick Irvine at the address at the top of this letter or email them to <a href="mailto:plan@rushmoor.gov.uk">plan@rushmoor.gov.uk</a>. Comments should be received by 5pm on 1 December 2014.

Yours faithfully

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Nick Irvine

Senior Planning Officer

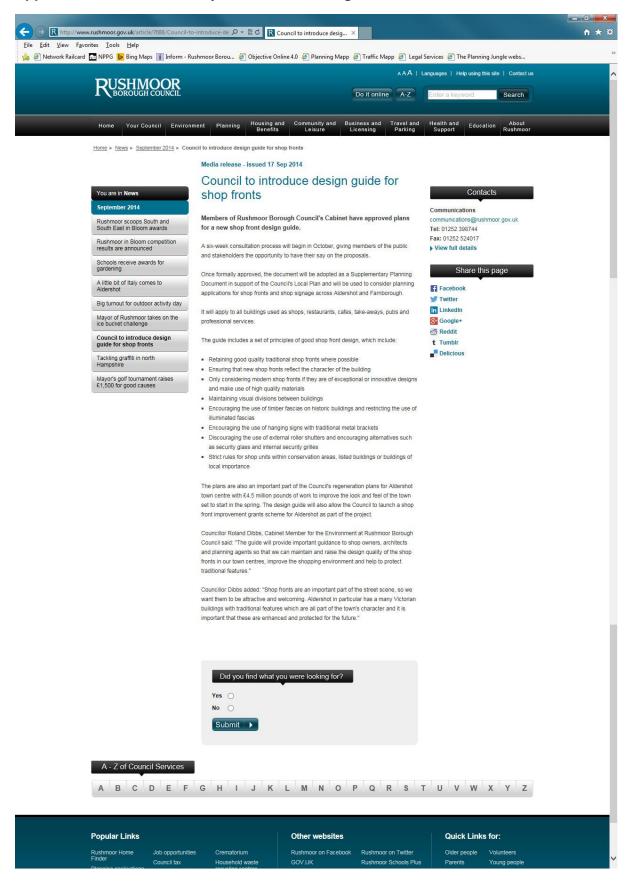
Planning Policy and Conservation

Chief Essentive Andrew Lloyd . Director of Resources Inn Herison . Director of Community & Esstrement David Cubic

Email: oustomereervices@rushmoor.gov.uk

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## Appendix 7 Press Release by Rushmoor Borough Council



## Appendix 8 Shop Front Design Guide Supplementary Planning Document – Consultation Responses and Officer Comments

Respondent	Response	Officer Comment
Natural England	Natural England agrees with the conclusion that the SPD will not	Comments noted. No suggested change.
	have a significant adverse effect on any Natura 2000 sites and	
	that a full appropriate assessment is therefore not required. We	
	also note that the SPD will support the delivery of Core Strategy	
	policies which have been subject to a full Assessment, including	
	any in-combination effects with other plans.	
The Farnborough	There are several apostrophe errors in the draft:	
Society		
	Contents: Should be Dos and Don'ts, not Do's and Don'ts	Comments noted. The apostrophe errors have been
	Page 3: 2.1. the plural of SPD is SPDs, not SPD's	addressed in the final version of the document.
	Page 7. 4.8. 1950's should read 1950s	
	Page 9: Heading should read Dos and Don'ts, not Do's and	
	Don'ts	
	I trust these will be corrected in the final draft.	
	The Farnborough Society generally welcomes this initiative to	
	improve the local street scene. However, we would like to	
	register some concerns as itemised below:	
	DP1: Who exactly will determine what constitutes a 'good	DP1 – Applications will be determined by an assigned Case
	quality traditional shop front'?	Officer within the Development Management team against
		the principles set out in the SPD. Where an application falls
	In what way will that individual be qualified to make that	within a designated conservation area or relates to a
	determination? The public would need confidence the person or	listed/locally listed building, the Council's Historic Buildings
	people charged with making these decisions is appropriately	Officer will be consulted on the proposals.

Respondent	Response	Officer Comment
	qualified.	
	DP2: Again, the public would need to feel confident that decisions are being taken by appropriately qualified individuals, or RBC could risk challenge.	DP2 – see above.
	DP3: This is even more problematic, given that taste is entirely subjective. It would therefore be vital that the public recognise the expertise of the individual making the determination.  Modern design tends to excite a good deal of opposition and RBC need to be prepared to counter that.	DP3 – The Council recognises that historic shop fronts will not be appropriate in all circumstances. Contemporary buildings will support contemporary shop fronts. It is recommended to amend Design Principle 3 to reflect that the onus of the text is on the introduction of modern designs within a historic building/conservation area.
	DP4: No objection	DP4 – Comments noted. No suggested change.
	DP5: We support this in principle, though we question whether mistakes in scale of the past can be rectified. Or will a precedent be deemed to have been set? Unless clarified, this might be open to challenge.	DP5 – This principle outlines what is considered by the Council to be appropriate/acceptable in design terms for the introduction of new fascia boards from this point forward. It addresses a gap in local policy that has resulted in incongruous fascia boards that are evident in parts of the Borough.
	DP6: No objection	DP6 – Comments noted. No suggested change.
	DP7: This might be problematic, given that damage can be caused by sunlight. However, we support the principle generally.	DP7 – Comments noted. No suggested change.
	DP8: No objection	DP8 – Comments noted. No suggested change.

Respondent	Response	Officer Comment
	DP9: The question of taste also arises here. Who will be the arbiter of RBC taste? It could invite challenge.	DP9 - Applications will be determined by an assigned Case Officer within the Development Management team against the principles set out in the SPD. As this principle relates to applications falling within a designated conservation area or relates to a listed/locally listed building, the Council's Historic Buildings Officer will be consulted on the proposals.
	DP10: No objection	DP10 – Comments noted. No suggested change.
	DP11: As with other aesthetic considerations, this is somewhat subjective and could invite challenge.	DP11 - As this principle relates to applications falling within a designated conservation area or relates to a listed/locally listed building, the Council's Historic Buildings Officer will be consulted on the proposals.
	DP12: No objection.	DP12 – Comments noted. No suggested change.
	Overall, we support the aims of the document, but are concerned that some of the design principles tend to rely on aesthetic taste, which is entirely subjective, and that this could leave RBC open to challenge unless the individuals charged with making decisions are demonstrably qualified to make those decisions.	
Environment Agency	Thank you for consulting us on the Shop Front Design Guide SPD. This consultation is a low priority and due to current resourcing issues we are experiencing we will not be providing a	Comments noted. No suggested change.
Waverley Borough	comment.  Thank you for consulting Waverley Borough Council on the	Comments noted. No suggested change.

Respondent	Response	Officer Comment
Council	above document. Waverley officers have considered the	
	document and do not wish to make any comments on the draft	
	SPD.	
Trevor Hills	Thank you for sending details of this consultation. The document	
	contains very sensible advice and I support its intent. There are,	
	however, one or two inconsistencies which should be	
	addressed. For example:	
	Figure 3 (Example of a Good Shop Front) shows a hanging sign	Comments noted. This inconsistency has been addressed in
	well above the fascia, contrary to DP8 which states: "hanging	the final version of the document.
	signs shouldbe at fascia level".	
English Heritage	Thank you for consulting English Heritage on the draft	Comments noted.
	Shopfronts SPD. We welcome this initiative as a tool to provide	
	a robust approach to managing change in the historic	
	environment by providing clear guidance and principles to	
	inform development proposals.	
	We have seen elsewhere that shopfronts design guidance can	
	provide an important resource in supporting sensitive	
	restoration of historic buildings and sustaining the character of	
	historic areas. In particular this helps raise awareness of the	
	impact of minor development on the character of the historic	
	environment as a whole and to raise the quality of design and	
	workmanship. We see this as an important contribution to	
	promoting sustainable development that protects and enhances	
	the value derived from sense of place with particular value for	
	supporting the vibrancy and success of town centres. As such,	
	we support the approach and commend the SPD to the Council.	

Respondent	Response	Officer Comment
	Notwithstanding our general support for the approach set out, we would like to take this opportunity to recommend a small number of amendments to the SPD to enhance the clarity of the guidance provided.	
	The paragraph at 7.5 relates to both listed buildings and buildings in a conservation area, while the guidance within the section (continuing to 7.7) relates to the wider range of designated and non-designated heritage assets. However, the heading of the section refers exclusively to listed building consent, which may fail to draw the attention of applicants for other appropriate applications to the information provided. We recommend changing the title of this section to either Heritage Assets or simply Historic Buildings and Areas.	Para 7.5 – Heading changed to reflect wider range of designated and non-designated heritage assets that are covered within the text. Suggested changes to the text have also been accommodated.  Additional information, as suggested by English Heritage, has also been added to this section of the SPD.
	The paragraph at 7.5 should explain that listed buildings require listed building consent in addition to planning consent for alterations that would affect their character as buildings of special architectural or historic interest, including alterations to shopfronts. It may also be instructive to point out to building owners that failure to secure consent before making alterations to listed buildings is a criminal offence.	
	The paragraph should draw attention to the requirement set out within the National Planning Policy Framework for the applicant to describe the significance of the listed building, conservation area or other form of heritage asset as part of their application,	

Respondent	Response	Officer Comment
	providing a level of detail that is proportionate to their	
	significance and no more than is required to understand the	
	potential impact of the proposal on them.	
	To ensure applicants make full use of the existing guidance	
	available to them the following section should also provide	
	direct reference to the Council's existing guidance, including the	
	Buildings of Local Importance SPD and the Council's guidance on	
	Heritage Statements. Where they are available, it would be	
	helpful to draw applicants' attention to the information already	
	set out in appraisals of conservation areas and the information	
	contained with the statutory list and the County's Historic	
	Environment Record as sources that should be consulted and	
	referred to in applications as a minimum.	
	Applications for shopfront additions or alterations affecting	
	historic buildings should be considered on a case-by-case basis	
	and informed by an understanding of the significance of the	
	building and its setting, either as a heritage asset or through	
	their contribution to the character of the area, potentially	
	forming part of the character and appearance of a conservation	
	area or other area of historic townscape. Whilst the traditional	
	form of shopfront illustrated may be suitable for buildings	
	constructed in the late 19th and early 20th century (or earlier	
	buildings that had shopfronts inserted during this period),	
	earlier and later buildings may have other forms of shopfront	
	that are representative of their age, whilst other commercial	
	buildings such as historic public houses may have very specific	

Respondent	Response	Officer Comment
	architectural features that reveal their age and historic use. As	
	such, a degree of caution needs to be expressed about over	
	prescriptive use of a standardised design based on a single	
	architectural period. As such, it will be necessary to consider	
	whether some of the principles set out will be weighed against	
	the need to sustain and enhance the significance of the building	
	or area as a heritage asset and potentially set aside where the	
	heritage significance of the building would be compromised. We	
	would recommend inserting a clause at 7.7 to read:	
	" Where a building's existing historic architectural features	
	already contribute to its historic or architectural interest, or to	
	the positive historic character and appearance of the area, these	
	should be identified within the assessment of the building and	
	preserved, or indeed revealed, through the design of any	
	alterations proposed."	
	We hope these suggestions help in taking forward the shopfront	
	guidance as a tool to support investment and regeneration in	
	Rushmoor. Should you wish to discuss any points within this	
	letter please do not hesitate to contact me.	
Chris Thomas Ltd on	We note firstly that the policies which this draft SPD is said to	Comments noted.
behalf of the British	support do not include any policies which refer to the control of	
Sign and Graphics	advertisements. It is assumed that the SPD therefore relies on	The SPD states at paragraph 2.2 that it relates to policy CP2
Association (BSGA)	the requirement for good design as suggested in the NPPF and	(Design and Heritage) of the Core Strategy and policy S3 (Shop
	NPPG.	fronts) of the Rushmoor Local Plan Review Saved Policies.
	We are sure that the Council would not disagree with the	The SPD does not override the Advertisement Regulations and

Respondent	Response	Officer Comment
	premise that "good" design is a subjective matter. You will be	does not seek to introduce additional criteria against which to
	aware that the Advertisements Regulations require	assess advertisements. It is a guidance document that seeks
	consideration only of amenity and public safety. The "need" or	to achieve an improvement to the street scene/retail
	"justification" for a particular advertisement is not a relevant	experience for shoppers by encouraging applicants to
	consideration (see section 4 of the PPG). For the same reason,	consider the design principles before submitting proposals.
	the content of an advertisement is rarely a relevant factor; nor	Supplementary planning documents add further detail to the
	whether the advertisement happens to be a "corporate" image.	policies in the Local Plan. They can be used to provide further
	Each proposal must be considered on individual merit and on	guidance for development on specific sites, or on particular
	the basis of visual amenity and/or public safety only. With this	issues, such as design in this instance. Supplementary
	background, we offer the following comments on the draft SPD's	planning documents are capable of being a material
	detail:	consideration in planning decisions but are not part of the
		development plan.
	Paragraph 3.6 – "consent to display" should be replaced with	Para 3.6 – comments noted and text amended accordingly. A
	"express consent" which is the correct term. "Is usually	footnote reference has been introduced as a link to the DCLG
	required" should be replaced "may be required". There are	advisory booklet "Outdoor advertisements and signs – a guide
	literally thousands of different advertisements which may be	for advertisers".
	displayed on or within a shopfront which are either excepted	
	from control or will have deemed consent. "Usually require" is	
	totally misleading. We suggest that reference also be made here	
	to the DCLG's free advisory booklet "Outdoor advertisments and	
	signs – a guide for advertisers", of which your Council should	
	hold a stock. Such reference would also helpfully replace	
	paragraph 7.9 of the SPD which is also misleading.	
	Desire District E (DDS)	
	Design Principle 5 (DP5) – the general assumption that internally	DP5 – Amend wording of DP5 with the following:
	illuminated "box fascias" are bulky and therefore unlikely to be	
	acceptable has no factual justification. We accept that older-	"Fascia boards shall be in proportion to the scale of the

Respondent	Response	Officer Comment
	style, fully internally illuminated bulky box fascia and projecting signs (often rather crudely "bolted-on" to an existing fascia) are often unacceptable. But modern internally illuminated slimline "box" signs, often fret-cut to restrict illumination to lettering/logo only, are often wholly appropriate and particularly well-related to more modern styles of shopfronts. Similarly, the assumption that timber fascias are the most appropriate on historic buildings is unsupportable. Historic buildings may well have modern shopfronts inserted. A timber fascia is likely to appear most incongruous when set above a modern shopfront. What is important is that the fascia (in design and materials) should relate appropriately to the shopfront (and, where possible, to the building as a whole). As a general advertisement control "principle", we suggest the following might replace the whole of DP5:	building and shop front. Overly large fascia shall not be supported. The top of the fascia should relate to the ground floor and should under no circumstances reach the base of the first floor windows. For buildings within a Conservation Area, particularly listed buildings, fully illuminated box fascias are likely to be unacceptable. This will certainly be the case where the shop front retains/proposes traditional elements. On a historic building that retains/proposes traditional elements, a timber fascia is most appropriate, either with painted lettering or with individual letters of another suitable material."
	"Advertising should be carefully designed with regard to the character and proportion of the shopfront, the building and adjacent shopfronts in the street scene. Similarly, materials should be chosen to empathise with the character and appearance of the shopfront and surroundings, particularly where the building is of historic importance or in a conservation area."  Design Principle 6 (DP6) – the Council cannot control the colour of shopfronts, even in conservation areas (although they may on	DP6 - Planning permission is needed for 'building operations' of any consequence, including most alterations and
	listed buildings). This is a personal matter for the owner. Similarly, there is no justification for selecting "corporate" image	extensions to existing buildings, within a conservation area.  This includes works that will materially affect the appearance

Respondent	Response	Officer Comment
	or branding as a particular instance. The Council may not reject	of the building. As such, the choice of colour can be
	a "corporate" image unless it is detrimental to amenity in the	considered by the Council in respect of the proposed works to
	particular circumstances of the individual case. Nor should the	shop fronts. Colour can be an extremely important factor in
	Council try to insist that colour schemes should be in keeping	determining the character and appearance of buildings. The
	with adjoining buildings. This is beyond the Council's control;	imposition of corporate colour schemes regardless of the
	and would make for some exceedingly dull shopping streets.	location may erode the character of the area but minor
	Similarly, what is a "vivid" or "bright" colour? Red, yellow,	variations can often emphasise the uniqueness of the
	maroon, green, orange? It would be a very strange shopping	location.
	street if all these "bright" colours were to be avoided. And what is a "large area"? A wall, window or some sort of plain panel?	Amend wording to replace "muted colours" with "a traditional
	This subparagraph is generally meaningless and should be	palette of colours".
	deleted.	pulette of colours .
	deleted.	
	Design Principle 7 (DP7) – "where suitable justified". See above.	DP7 – Amend wording to replace "where suitably justified"
	The advertiser does not have to "justify" any advertisement. It	with "where they are not detrimental to the character or
	must be considered on grounds of amenity only. "Where	appearance of the conservation area/listed building."
	suitably justified" should be replaced with "where they are not	
	detrimental to amenity".	
	Design Principle 8 (DP8) – "where considered appropriate" –	DP8 – Delete "Where considered appropriate". Amend "be at
	considered by whom? This should be replaced with "where	fascia level" to read "be above fascia level" as the original
	acceptable in terms of visual amenity". "Be at fascia level"	wording contradicts the drawing in Figure 3. Replace
	contradicts figure 3! Hanging signs are often displayed above	"projecting box signs which are internally illuminated should
	fascia level and this adds to the charm of the street. "Be at fascia	be avoided" with "slimline box signs with subtle e.g. letters
	level" should be deleted. Again, the assumption that internally	only) may be acceptable where related to a modern shop
	illuminated projecting box signs should be avoided on historic	front."
	buildings and in conservation areas has no factual justification.	
	See comments on DP5. Subtle (perhaps letters only) internally	

Respondent	Response	Officer Comment
	illuminated "slimline" projecting signs may well be acceptable on modern shopfronts, even where they are in a listed building or conservation area. Again, a "traditional hand painted sign" would look totally out of place on a modern shopfront. "Hanging signs should not be used as a means of additional advertising" – this requires an assessment of the "need" for the sign which matter is not within the Council's powers under the Regulations (this also applies to "unnecessary additional advertising" in Figure 4 which should be replaced with "advertisements poorly related to the appearance and character of the building").	
	Design Principle 9 (DP9) – as above, the suggestion that all signs in conservation areas or on listed buildings should be "traditional styled hand painted lettering" or wood or metal raised lettering has no justification. There are not enough signwriters left in the UK to meet such demands in Rushmoor alone, let alone the rest of the UK! We see no purpose at all in this flawed design principle and suggest it be deleted entirely.	DP9 – Amend wording of DP9 with the following:  "Where traditional elements of the shop front are retained/proposed in Conservation Areas or on Listed Buildings, signage should use traditional styled hand painted lettering or raised lettering in wood or metal. Other types of lettering shall only be supported if of suitable appearance.  Glass signage and glass painting shall also be considered."
	Design Principle 10 (DP10) – as with DP9, this totally generalised statement is overly prescriptive. It does not allow for consideration on merit. It adds nothing to the SPD as a whole and should be deleted.	DP10 – Having reviewed the principles, it is considered that the issue of illumination is satisfactorily addressed by other principles. Subsequently it is recommended that DP10 is deleted.
	Design Principle 11 (DP11) – "where suitably justified". See above. It is not within the Council's powers to consider "justification". "External illumination of". This is impossible as	DP11 – Replace wording of DP11 with the following:  "Illumination must be carefully designed to reflect the

Respondent	Response	Officer Comment
	explained above. It should be sufficient to say that the illumination of shopfronts and signs will be permitted provided that it does not adversely affect amenity. If the Council consider that extra guidance is required, we would suggest that DP11 be replaced with:  "Illumination must be carefully designed to reflect the character and appearance of the overall shopfront. Internal illumination can often be effective where the design allows only the characters of the signs to be illuminated, perhaps through individually mounted lettering, fret-cutting or halo lighting. In circumstances where external illumination is proposed as more appropriate to the design of the shopfront, fittings should avoid an unsightly clutter of projecting lamps and wiring."	character and appearance of the overall shopfront. Internal illumination can often be effective where the design allows only the characters of the signs to be illuminated, perhaps through individually mounted lettering, fret-cutting or halo lighting. On traditional shopfronts, particularly those within conservation areas or on listed buildings, external illumination is preferred e.g. spotlights/trough lighting as this is more appropriate to the design of the shopfront. In such cases, fittings should avoid an unsightly clutter of projecting lamps and wiring."
	Paragraph 7.8 – to avoid confusion, "permission" (in the second sentence) should be replaced with "consent".	Para 7.8 - Replace "permission" (in the second sentence) with "consent".
	Paragraph 7.9 – is generally inaccurate and misleading. For example, advertisements within Class 2 in Schedule 3 to the Regulations may be displayed on shop walls which do not have a shop window. We suggest that this paragraph be replaced with a simple reference to DCLG's excellent advisory booklet, as above.	Para 7.9 – amended to make reference to the DCLG advisory booklet.
	It is hoped that these comments are found to be useful and informative, if you have any further questions, please contact me.	