# **Shopfront Design Guide Supplementary Planning Document Consultation Statement**

#### March 2024

#### 1.0 Introduction

1.1 This Consultation Statement has been prepared in accordance with Regulations 12 and 13 of the Town & Country Planning (Local Planning) (England) Regulations 2012 and the council's Statement of Community Involvement.

#### 2.0 What was consulted upon?

2.1 The Shopfront Design Guide Supplementary Planning Document (SPD) was subject to a six-week period of consultation between 23 October and 3 December 2023.

#### 3.0 Why is the SPD needed?

3.1 The Shop Front Design Guide SPD sets out guidance to promote good shop front design, restoration and refurbishment. The aim is to improve the general standard of design across the county when carrying out general shopfront alterations and when bringing vacant buildings back into use. This is especially important in areas that are a designated as a conservation area or affect designated or non-designated heritage assets.

#### 4.0 Area of coverage

4.1 The SPD covers the whole of County Durham.

#### 5.0 Steps the council took to publicise the draft SPD.

- 5.1 The council publicised the draft SPD by:
  - a) emailing consultees on the planning policy consultation database;
  - b) publicising via the council's online consultation portal;
  - c) making hard copies available in Durham County Hall and Customer Access Points;
  - d) making the SPD available on the council's website;
  - e) online events with the public and the industry;
  - f) using the council's corporate notifications and social media outlets; and
  - g) press release.

#### 6.0 Outputs from online events

Two online events were held during the consultation period on Wednesday 7 November from 5:30pm to 7pm, and on Tuesday 14 November between 10am and 11.30am.

#### 7.0 Formal responses to the consultation

- 7.1 Three representations were received to the formal consultation from City of Durham Parish, City of Durham Trust and Belmont Parish Councils, which are set out in full alongside the council's response in Appendix A.
- 7.2 In summary responses highlighted the following key issues:
  - a) Document welcomed.
  - b) Whilst the document rightly focuses its main attention to traditional shopfronts and the historic environment, responders considered that more guidance is needed in relation to new shopfronts and leisure premises frontages. Different retail areas need to be treated with some degree of separation based on their own distinct character.
  - c) There are benefits to encouraging retention of traditional historic shopfronts.
  - d) Consideration should be given to the effect of the shopfront design on the wider street scene.
  - e) SPD rightly highlights that many modern security shutters are generally not suitable for use in retail areas and it should insist that external shutters are excluded completely from areas such as the Conservation Area.
  - f) The document could be strengthened by requiring all new illuminated signage to comply with the Institute of Lighting Professionals best practice.
  - g) A Frames are now to be prohibited and that the primary purpose of the public highway i.e., to pass and repass without let or hindrance is supported and upheld across the county. We congratulate DCC on this element of this SPD but hope that this will be matched by effective enforcement.
  - h) Outside seating must be clearly delineated from the pavement and provide adequate clearance for pedestrians free of street furniture. This SPD or perhaps another more suitable document should set down that bins should not be left out on street and that internal bin collections should be promoted as much as possible.
  - i) Examples are needed to show good and bad design.

#### 8.0 Changes to the SPD

8.1 Following consideration of the feedback received a number of changes were made to the SPD. Key changes include:

- a) Additional text has been added to note that while the information within the SPD is geared towards traditional shopfronts, the principles are relevant to all shopfronts.
- b) Encourage retention and restoration over replacement references included to emphasise this point.
- c) A Frames document already contains reference to this matter. Section has been amended however to reflect what can/cannot be controllable through planning.
- d) Document now contains numerous examples of 'good' design to show what can be achieved and would be encouraged.
- e) Minor presentation and text amendments to improve accuracy and clarity.

#### 9.0 Next Steps

- 9.1 The SPD will be subject to a second stage of consultation from 3 June to 14 July 2024. The consultation will be publicised using the following methods:
  - a) emailing consultees on the planning policy consultation database;
  - b) emailing those who responded to the first stage of consultation or attended an online event;
  - c) publicising via the council's online consultation portal;
  - d) making hard copies available in Durham County Hall and Customer Access Points;
  - e) making the SPD available on the council's website;
  - f) online events with the public;
  - g) using the council's corporate notifications and social media outlets; and
  - h) press release.

## Appendix A – Formal consultation responses

Respondent	Comment	DCC Response
City of	Shopfront design has always been strongly influenced by	New shopfronts and leisure premises frontages.
Durham	fashions and prevailing architectural trends. Whilst this	References added noting that while the information within
Parish	document rightly focuses its main attention to traditional	the SPD is geared towards traditional shopfronts, the
Council	shopfronts and the historic environment, the Parish Council	principles are relevant to all shopfronts.
	believes that more guidance is needed in relation to new	
	shopfronts and leisure premises frontages.	Encourage retention and restoration over replacement –
		references included to emphasize this point, e.g. p4.
	Design principles	
	The Parish Council believes that this document should	Illumination
	encourage the retention and restoration of historic and	Multiple shopfronts – should stay that way not be
	traditional shopfronts over replacement, particularly where	amalgamated. This issue is case specific but the principles
	the original shopfront or detailing still remain. This can	within the document should cover this issue in terms of
	often be a more cost-effective and sustainable way of	retaining existing traditional shopfront features etc.
	improving a shopfront, and helps to retain the character of	
	the building and street scene. In that regard, the Parish	Security – term needs to be kept as certain cases require
	Council very much welcomes the <i>Principles of Shopfront</i>	this approach.
	Design section of this document at page 9.	
	The Parish Council also welcomes the guidance on	Illumination – compliance with other standards. Cannot
	corporate images and use of colour for shopfronts within	require this here, but can reference it
	this document. Inappropriate illumination from signage and	
	modern intrusions into the historic fabric of streets are an	A Frames – document already contains reference to this
	ongoing problem in Durham City.	matter. Section has been amended however to reflect what
	The Parish Council feels that this section of the document	can/cannot be controllable through planning.
	should press this issue further. Consideration should be	
	given to the effect of the shopfront design on the wider	Seating and bins – not within remit of this doc.
	street scene. Poor or overbearing designs can have a	
	negative impact on the appearance of the neighbouring	Illumination document noted, however this is not free
		information which can be shared, but a chargeable

shops and wider shopping street, and reduce the appeal for shoppers to visit and spend time within the area. This section of the document should state clearly that developers should look to neighbouring buildings for inspiration and identify the character of the shopping street so that the proposal blends in with the street scene, whether this is a consistent uniform style, or a variety of styles which add interest and individuality. The proportions, materials and detailing should not seek to dominate unnecessarily.

Moreover, where a shop occupies more than one unit, the shopfront should seek to retain the appearance of each individual unit to promote the vertical emphasis and retain the rhythm of the buildings. These may be linked visually through the use of a consistent fascia design on each unit.

#### Security

The Parish Council very much welcomes the guidance set out in page 12 of this document relating to the security of shops and premises but feels that this should go further and insist that external shutters are excluded completely from areas such as the Conservation Area or, at the very least, the term "if possible" be removed from this section. As the main funding body for the City's successful ShopWatch initiative, the Parish Council fully accepts that security is of the upmost importance to retailers within town centres, however the impact of some of these methods can have a significant and detrimental impact on the street scene. The Council's draft SPD rightly highlights that many modern security shutters are generally not suitable for use in retail areas.

document. Reference to illumination are included in the document as well as being a matter covered by CDP policy 31.

Solid, or almost solid, external roller shutters have a negative effect on the shopping street which can outweigh the perceived security benefits. They can also create a foreboding appearance which gives the impression that the area is susceptible to crime and attract graffiti and flyposting and conceal important architectural features of the premises.

Traditional shopfronts with classical principles of design such as stall risers, mullions and glazing bars, are generally more secure than modern designs with extensive panes of glass as smaller areas of glass are harder to break. The most effective measure to improve the security of premises is to encourage an active and well-used high street throughout the day and evening which in turn would encourage its own natural surveillance.

#### Lighting

The Parish Council fully endorses the section of this document which relates to lighting and would add that light pollution in general is a growing issue of concern within the City; the damaging effects of which must be mitigated through the planning system. Indeed, paragraph 5.325 of the supporting text for CDP Policy 31 is clear that: "Light pollution is artificial light that illuminates areas that are not intended to be lit. The intrusion of overly bright or poorly directed lights can cause glare, wasted energy, have impacts on nature conservation, and affect people's right to enjoy their property. It can also severely affect our view of the night sky. Light pollution may also damage the perception of a heritage asset in its setting, especially if the asset is experienced at night or is floodlit. The NPPF is clear that planning policies should limit the impact from

light pollution on local amenity." There is a cumulative impact from all the night time uses and their advertising from leisure-based units within the City. Unnecessarily high levels of illumination will add to this cumulative negative impact.

Whilst local development plan policies offered some level of protection against this issue, the Parish Council feels that this document could be strengthened by requiring all new illuminated signage to comply with the Institute of Lighting Professionals – The Brightness of Illuminated Advertisements (PLG05) 2015 document. This document offers clear guidance on the planning, assessment and maintenance of all forms of illuminated advertisements. It is a must have document for planners and lighting specialists who work in the area.

#### A Frames

The Parish Council very much welcomes the fact that this document now makes clear that A boards will no longer be permitted.

This is something the Parish Council has long called-for in both Saddler Street and Silver Street in Durham City, where we have a particular issue. As you will be aware, a disability audit was carried out of Durham City in 2019 and 2020 by an inclusive design consultant. This work was commissioned by Durham County Council's Equality and Diversity Officer, Transformation and Partnerships. The aim of this audit was to establish the current level of accessibility in Durham City centre and to identify the barriers and other potential issues which disabled people might experience when visiting the city. The audit also includes four levels of prioritised recommendations so that

a plan of remedial works can be formulated and implemented in tandem with budgets. Recommendations put forward by the inclusive design consultant were categorised, for example where an issue constitutes a potential health and safety hazard, it is allocated Priority 1. Recommendations were provided for best practice solutions and minimum standards, where appropriate. The use of A boards by local businesses on the public highway was highlighted throughout the audits as a recurring issue and the design consultant has proposed that DCC consults with local visual impairment groups to obtain their views on these features.

Tackling the use of A frame boards in the City centre was allocated priority 3-4 by the audits. This is a substantial problem for those with mobility impairment, such as the blind and partially sighted, wheelchair users and people with prams/pushchairs.

It is right that these A Frames are now to be prohibited and that the primary purpose of the public highway - i.e., to pass and repass without let or hindrance – is supported and upheld across the county. We congratulate DCC on this element of this SPD but hope that this will be matched by effective enforcement.

#### Seating and bins

Forecourt seating or trading form part of a shopfront and can invigorate the street scene, however in Durham City this is causing an unacceptable situation in many parts of the main shopping centre. The Parish Council would welcome a statement within this document which specifically set out that this must avoid causing obstruction

to pedestrians, nuisance to nearby residents or harm to visual amenity.

Outside seating must be clearly delineated from the pavement and provide adequate clearance for pedestrians free of street furniture. Particularly for primary routes with heavy footfall, the Parish Council would welcome clear guidance in metric terms in this document of what space must be required at all times to allow pedestrians to pass unhindered.

Similarly, bins left out on the street can have a terribly negative impact on our town centres. This is a particular problem in the City and the Parish Council would welcome a strong statement from this SPD or perhaps another more suitable document that bins should not be left out on street and that internal bin collections should be promoted as much as possible.

# City of Durham Trust

Generally, the Trust welcomes the guide and considers that it will be useful document when approved. The Guide concentrates on traditional shopfronts and consequently the historic environment. While this is helpful and supported by the Trust, there is a need to deal with new shopfronts and leisure premises frontages. It will need additional sections to deal with this or to clearly identify its current focus.

The main thrust of the Trust's comments is to reflect its concerns experienced when dealing with planning applications and the extensive experience of members and trustees. Principal areas are:

1. The retention and repair of traditional shopfronts

p.3-8 reference added to include mention of 'modern' buildings – guidance is transferable to all shopfronts despite the emphasis on traditional approaches, page 18 new section on modern shopfronts, with good practice examples.

p.10 amended

p.12 security wording amended

Signage section amended to include reference to lettering. p.13 A boards are outside the scope of planning, but there is reference included with document. External areas referenced here would be best tackled through a more

- 2. The intrusion of contemporary (i.e. modern) additions or changes, particularly signage, lighting and for leisure uses.
- 3. New leisure and shop frontages.

Pages 3-8 – this is a generally useful introduction but needs, as the comment above, to clarify what the scope of the guide is – traditional only or traditional and modern. Pages 9-10 – The Trust would like to draw attention to the former Durham County Council, Environment Department publication 'Shopfronts - Design Guidelines in County Durham.' The date is unknown but the guide to traditional shopfront elements remains useful and is richer in its content than the SPD draft. It merges advice and description but it is a useful source.

Page 10 also has some paragraph issues - the right hand side first paragraph belongs below the first two paragraphs on the left-hand side.

Page 11 Corporate Image – the desire to see new investment by corporate businesses has, on occasion, taken precedence over the need to respect the historic environment. This section is very welcome. Signage size, lighting and building colours have all been problematic: branding design can be adapted but is seldom welcomed as a suggestion. Other authorities achieve this and this section is a useful step towards improvement. The section strays into modern design and more clarity and expansion of this is needed: traditional and modern have quite distinct design requirements.

Page 11 Use of Colour, Canopies and Blinds– the Trust supports these sections.

Page 12 Security – The Trust suggest strengthening this section and the removal of the qualification in the second

appropriate means, as they are not relevant to shopfront design.

p.13 internal computer screens etc. are outside the scope of planning. Existing references to illumination matters is included within the document.

P15 image updated as noted to show a more appropriate shopfront. Document now contains numerous examples of 'good' design to show what can be achieved and would be encouraged.

sentence, thus - 'Generally external shutters should be avoided in favour of an internal shutter or lattice inside the glazing.'

Pages 12-13 Signage and Lighting – As noted, the Trust sees this as a particular concern. An addition suggested is to deal with the overlarge size of lettering – this is a frequent problem and guidance is needed. Shutting off external lighting after business hours would be a useful recommendation. Often lighting is simply left on in the belief that it is useful advertising but is more of an environmental nuisance of little practical value. In relation to light levels it would be valuable to reference the Institute of Lighting Professionals current guidelines for advertising (*Professional Lighting Guide 05/22, PLG05 The Brightness of Illuminated Advertisements*). If modern frontages are to be included in these guidelines this is a specific issue that requires clear advice.

Page 13 Internal Lighting/Window Displays – The high levels of illumination of digital screens sited inside the frontage windows needs a reference. These are very intrusive in a historic setting with limited light levels. Page 13 Pavement Signs/A Boards – The Trust supports this section but it needs to also deal with the prevalence of low-cost poorly-designed external areas for leisure premises. While originating during COVID lockdowns these are now becoming more permanent. Their design is often at odds with the main building. The extents of outside seating areas and their delineation may stretch the definition of 'shopfronts' but guidance is needed. The outer delineation can be very effectively set by using planters or flexible barriers.

Pages 14-15 - The content is useful.

	Page 15 Maintenance – the photo example should be replaced – the colour blocking and sign size is not appropriate and runs counter to the guidelines in other sections.  Generally – Examples are needed to show good and bad design – this may cause issues with building owners and tenants and care would be need in how these are shown. Commissioning drawings would be a solution, they were used very effectively in the earlier DCC shopfronts guidance.	
Belmont Parish Council	Our primary concern in relation to this SPD on shopfront design is that it is very much designed towards a traditional town centre. There is no variation to take into account shops in other locations; for example, commercial retail parks and high streets where non-traditional or more modern building types are found. We feel that it is inappropriate to place a singular County-wide policy on what is in reality a variety of different environments. Different retail areas need to be treated with some degree of separation based on their own distinct character.  Belmont and Gilesgate Neighbourhood Plan area is a case in point. The distinctive settlement nature of Carrville and Gilesgate developed differently and independently to Durham city centre. As is suggested in comments submitted to the Design Code consultation, the area, warrants particular treatment as an area of urban extension. Therefore Durham City Retail Park, Carrville High Street, Cheveley Park and the shopping areas along	The approaches to traditional shopfront design are transferable to shopfronts of various ages, e.g. proportions, glazing, signage, security etc.  Wording has been added to reflect this fact.  Comment re. shuttering is noted and text already refers to considerations to make with regards to the installation of shutters.

particular location and not necessarily the traditional city centre model.

As an example, certain areas have a prevalence of crime and therefore significant external shuttering is needed in these areas. We feel that these external shutters can be part of an acceptable design within the street scene, particularly if they are decorated appropriately. The shutter on the "Hop Knocker" on Sunderland Road features attractive artwork which enhances the area and could be used as an exemplar for other areas.

We recommend a more nuanced and adaptable approach to shopfront design, taking into account the particular character of various retail settings, is developed.