Appendix B



SHOP FRONTS AND SIGNAGE DESIGN GUIDANCE IN CONSERVATION AREAS - SUPPLEMENTARY PLANNING DOCUMENT (SPD)

PUBLIC PARTICIPATION STATEMENT

December 2011

1. Introduction

- 1.1 Telford and Wrekin Council has prepared a Draft Supplementary Planning Document (SPD) on Shop Fronts and Signage Design Guidance in Conservation Areas. The SPD is intended for use by developers, applicants for planning permission, the Council and the general public in respect of such proposals within conservation areas and will be a material planning consideration when the Council determines planning applications for such development. It also provides advice of wider relevance with regard to good shopfront design in the Borough.
- 1.2 This Consultation Statement supports the SPD and relates to the public participation carried out in its preparation and has been prepared in order to meet the requirements of Regulation 17(b) of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008 and also to provide feed back to consultees on how the representations made during its preparation have been dealt with.
- 1.3 The SPD has also been prepared in accordance with the Borough of Telford & Wrekin Statement of Community Involvement (SCI). The SCI can be viewed on the Council's website.

2. Consultation period and methods

- 2.1 An initial consultation draft of the Shop Fronts and Signage Design Guidance in Conservation Areas SPD was published for preliminary engagement from 19 October 2007 to 30 November 07. A consultation on the revised SPD was then held from 19th January to 1st March 2010
- 2.2 On both occasions throughout the two 6 week consultation periods the draft SPD and the draft Sustainability Appraisal were made available for inspection at the Council offices at Darby House and Civic Offices, at all Libraries, post offices and community centres in the Borough, at the Wrekin Housing Trust offices and on the Council's website.
- 2.3 Copies of the document and an accompanying letter requesting comments were sent to Council Members, all Parish Councils, adjoining Local Authorities, adjoining parishes and specific statutory consultation bodies such as utility companies, and government advisory bodies such as English Heritage. In all nearly 100 copies of the document were supplied to these groups at both stages of consultation.
- 2.4 In addition, the Council holds an extensive and regularly updated database with close to 400 address details of contacts. These include national and local interest groups, developers, agents, residents associations, local businesses and interested members of the public. These contacts were notified in writing of the opportunity to comment on

the SPD as part of both stages of consultation. Details of how, where and when to submit comments were included in the correspondence.

2.5 Details of the representations received and from whom are supplied in appendix 1. Where changes have been made, how the issues have been addressed in the SPD is identified.

Appendix 1 - Representations Received

Representations were received from the following bodies, groups or individuals:

Wellington Town Council
Brian Begley - Telford & Wrekin Senior Citizens Forum
Urban Designer, Telford & Wrekin Council
David Stentiford – Pegasus Planning Group
Mike Taylor – English Heritage
Cllr Sean Kelly – Telford & Wrekin Council
Principal Planning Officer, Telford & Wrekin Council
British Shopfronts Signage Assoc c/o Chris Thomas Ltd
Councillor Louise Lomax – Telford & Wrekin Council
InFocus Photography Ltd
Lawley and Overdale Parish Council

The matters raised and Council responses including how the issues have been addressed in the SPD are set out in the following table:

Summary of the main issues raised in representations:	How these main issues have been addressed in the SPD:
Wellington Town Council Planning Committee resolves to support the document as being a useful and helpful guide.	The changes requested refer to existing adopted polices in the current Wrekin Local Plan. The alteration of these policies is beyond the scope of this document.
Scope and appropriateness are excellent. Explains the concepts very clearly and useful guidance for those wishing to comment. Agrees roller shutters give the impression of crime problems in areas where they are used. They also give a detrimental perception to people visiting those areas where roller blinds are prevalent. The blinds invariably become covered in graffiti. The use of decorative grilles for shop windows gives a much better impression to visitors to an area and your document showed pleasing examples of this.	No change required
Generally positive regarding content, particularly the architectural breakdown of a shop front. Recommended changes to the text to improve clarity.	A number of changes were made in accordance with the representation
The document suggests that a traditional solution will always be required, in some cases a contemporary approach may be appropriate – the document is too narrow in its indication of 'good design' – it picks up on what is good 'traditional'	These comments are noted, however, the scope of this document refers specifically to period properties, including listed properties This guidance is aimed at the design of traditional shop fronts in existing period properties, and whilst it

but there are other good design solutions that can work in Conservation Areas. The document would not be robust in for example considering a contemporary new build. Signage – more detail on likely approach to illumination would assist – the options discussed are minimal and do not include halo illuminations – which is often favoured as a means of illumination in sensitive locations. The documents should recognise that there are deemed consent allowances.	can be used to assist in the design of a 'traditional' new build, it is not intended to imply that modern designs of the highest quality will be deemed inappropriate. There were changes to the document made therefore to clarify that the guidance was primarily aimed at the design of traditional shop fronts in existing period properties. With regard to signage – it is acknowledged that there is a certain degree of permitted development for non-illuminated signs within Conservation Areas, however it is felt that this design guide can also positively influence the improvement in design of signage done under permitted development. Section 63, line 3: insert "or some halo effect lighting for example" after " co-ordinated trough lighting".
The document was reviewed by Mike Taylor, Historic Area Advisor, who had no comments to make regarding changes.	No change
Introduction, paragraph 5 – must make explicit reference to the Borough Towns Initiative, so that the SPD may be used for guidance when regenerating those towns that sit iust side the Conservation Areas, i.e, Oakengates and Dawley. It is important that the LDF makes explicit reference to the Borough Towns Initiative, to make the Council's pledge to regenerate our borough towns binding and official.	The guidance was initially drawn up specifically for Conservation Areas only, where we have more direct and specific control regarding the preservation of character, however, it is hoped that by raising the standards of design in these areas we will encourage a higher standard throughout the Borough. Reference to the Borough Towns Initiative within the SPD will help to re-enforce this, however we must be clear that this SPD is rooted in the framework of existing saved policies in the Wrekin Local Plan (HE10 and HE11). Those polices are not relevant for areas outside Conservation Areas. The Borough Towns Initiative however concerns regeneration both inside and outside Conservation Areas so in order to clarify: Section 1, para 2:insert "It is hoped that this design guidance can support the work being done by the Borough Towns Initiative, aimed at the regeneration of the Borough Towns (formally District Centres) of Dawley, Oakengates, Ironbridge, Newport, Wellington and Madeley." At the end of the paragraph.
There are inaccuracies in the policies identified in Section 2. HE1 is no longer relevant.	Section 2.1 para 1: Delete paragraph and replace with "There are a broad range of policies within the Wrekin Local Plan for the preservation and enhancement of Conservation Areas and Listed Buildings. Those specifically relating to commercial premises or former commercial premises are written Below. Policy HE10 and HE11 provide the policy framework which underpins this SPD. These policies are supported nationally under PPG15. A full list of the relevant

	Local Plan policies is contained in appendix 1". Section 2.1, para 2: Delete the paragraph beginning "HE1 Preservation and Enhancement". Appendix 1: Delete the following policies: HE1, HE5, HE9, HE12, HE13, HE14, HE17-20, HE22 and HE23.
There is a need to clarify in the document that this SPD, when adopted, will form part of the Local Development Framework for Telford and Wrekin. References to Wrekin Local Plan policies that have not been saved need to be deleted. There should be an explanation of a saved policy and a note that in due course HE10 and 11 will be superseded. Suggest explain that the document has been prepared to provide further detail to policy CS15 "Urban Design" within the LDF Core Strategy and gives additional guidance for shop front development proposals in the Borough.	Section 1: Insert "This Supplementary Planning Document, on adoption, will form part of the Local Development Framework for Telford and Wrekin. It has been prepared to provide further details with respect to policy CS15: Urban Design within the LDF Core Strategy and gives additional guidance for shop front development proposals in the Borough".
The BSGA generally welcomes the draft SPD. Consider that, for the most part, its advice is sensible and reasonable. We recognise that the SPD is aimed mainly at "period" shopfronts and, provided it is used mainly in this context, the advice on the apprpriate size, style and materails for signage is sound. The SPD, however, fails to make any reference to PPG19 or DCLG Circular 03/2007, which contain appropriate national policy advice on advertisement control in conservation areas. Paragraph 22 of PPG19 states: "Many conservation areas are thriving commercial centres where the normal range of advertisements on commercial premises is to be expected, provided they do not detract from visual amenity. On the basis of this advice, we consider that the SPD's references to internally illuminated signs being "only permitted in exceptional circumstances" (comment on Policy HE10), "not permitted" (para 6.15) and "not appropriate" (para 8.5) are contrary to PPG19 and partly self- contradictory. Indeed, the ststaement (para 8.5) that "some halo effect lighting" is acceptable proclaims the acceptability of internal illumination since the "halo-effect" lighting is necessarily internal. Internal illumination also has the additional benefits of reducing clutter and extra paraphernalia on shopfronts by obviating the need for additional lighting trough or spotlight fittings. We are not advocating "standard" box signs crudeley attached to an existing facia. But there are opportunities for internally illuminated signs which will have an acceptable impact. What is crucial is that whatever type of sign is proposed is	Changes made accordingly as requested

appropriate to the shopfont, building facade and street scene. And, following the advice in PPG19, we consider an appropriately designed internally illuminated sign may be appropriate above a modern shopfront within a commercial street scene. We would therefore welcome the deletion of the advice in policy HE10 comment and paras 6.15 and 8.5 outlined above. We consider that the subject of illumination can be contained within para8.5 and that the first sentance of this para should be deleted and replaced with "Carefully designed internally illuminated signs may be acceptable, particularly within the commercial parts of conservation areas, where the sign will not adversely affect the character or appearance of the shopfront, building and the street scene". The second sentence might then read " Some halo effect lighting or external illumation by means of colour co-ordinated and unobtrusive lighting troughs or spotlights may also be an acceptable form of illumination". We do not disagree that swan-neck lights are generally faux and offer a poor form of lighting from often unsightly fittings.	
The conservation areas cited omit Madeley as a conservation area. Either Ironbridge Gorge should be expanded to read Ironbridge George World Heritage Site or Madelely High Street should be included.	Change made accordingly
Advocates both regulating renovation and new build within the designated areas in order to give a harmony. Apply the approach all existing and new shopfronts. This does have implications of cost to the property owners. Seeks financial compensation to offset those costs i.e. a rate reduction. Suggests give grants to every shop owner in order to get the work done in order to achieve the desired look to the areas involved. Need to have a comprehensive approach to achieve the historic appearance sought and avoid unnecessary expense for shopkeepers.	Comments noted but setting up grant schemes is outside the scope of this document
Parish Councils should be given the opportunity to respond to planning applications for signage before they have been installed. Planning applications for signage should not be submitted retrospectivley. Since Telford Town Centre is within the parish of Lawley and Overdale, the parish council often sees planning applications for signage and most of these are retrospective. There are places where there are too many signs which create a distraction to motorists.	Comments noted but are outside the scope of this document. Passed to Development Control.