

Retail Frontages, Design & Signage  
Supplementary Planning Document  
**Consultation Statement**

## **1. Introduction**

- 1.1 The Town and Country Planning (Local Planning) (England) Regulations 2012 require a local planning authority to consult the public and stakeholders before adopting a Supplementary Planning Document (SPD).
- 1.2 This statement sets out details of the consultation which has informed the preparation of the SPD.
- 1.3 The purpose of the draft Retail Frontages, Design & Signage SPD is to aid the effective implementation of the Design and Heritage policies in the District Plan (Chapters 17 and 21 respectively) relating to the design of shopfronts and advertisements, particularly within Conservation Areas and on Listed Buildings. Once adopted the SPD will be a material consideration in planning decisions.

## **2. Town and Country Planning Regulations**

- 2.1 The SPD is produced in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012. The relevant regulations relating to the consultation process are explained below.
  - Regulation 12: Regulation 12(a) requires the Council to produce a consultation statement before adoption of the SPD, this must set out who was consulted, a summary of the issues raised, and how these issues were incorporated in to the SPD.
  - Regulation 12(b) requires the Council to publish the documents for a minimum 4 week consultation, specify the date when responses should be received and identify the address to which responses should be sent.
  - Regulation 35: Regulation 12 states that when seeking representations on an SPD, documents must be available in accordance with Regulation 35. This

requires the Council to make documents available by taking the following steps;

- Make the document available at the principal office and other places within the area that the Council considers appropriate;
- Publish the document on the Council's website.

### **3. Statement of Community Involvement (SCI)**

- 3.1 The Council's current SCI was adopted in 2013 and explains how the council will involve the community in plan-making and in the consideration of planning applications. Since 2013 there have been changes to legislation and the District Plan has been adopted.
- 3.2 Therefore, the Council is updating its SCI. A revised document has recently been subject to public consultation with the aim to adopt it in October. The principles of inclusive and accessible consultation continue but the revised SCI includes more information about neighbourhood planning, the use of social media and the expectation that SPDs can, if relevant, be subject to 4 weeks of consultation, instead of 6 weeks.

### **4. Consultation undertaken**

- 4.1 The SPD was approved for public consultation at Executive on 26<sup>th</sup> February 2019. Formal public consultation was undertaken on the draft SPD for a period of six weeks from 20 June to 1 August 2019.
- 4.2 Consultation was undertaken in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Statement of Community Involvement. Consultees were consulted by email; or post where no email address

was provided. A list of consultees is provided in Appendix A. The SPD consultation was also advertised via the Council's website, social media and newsletter Network.

4.2 The SPD and Strategic Environmental Assessment (SEA) Screening Statement were made available on the Council's website: [www.eastherts.gov.uk/retailfrontagesspd](http://www.eastherts.gov.uk/retailfrontagesspd). This included Information about how to submit representations. Paper copies were available for public inspection during normal office hours at the East Herts Council Offices in Hertford and Bishop's Stortford, town council offices and in libraries across the district.

4.3 Representations could be made via the Council's consultation portal <http://consult.eastherts.gov.uk/portal>; emailed to [planningpolicy@eastherts.gov.uk](mailto:planningpolicy@eastherts.gov.uk) or sent to; Planning Policy, East Herts Council, Wallfields, Pegs Lane, Hertford, SG13 8EQ.

## **5. Issues raised during the consultation**

5.1 During the consultation, 13 representations were received, made by 11 respondents. Of the representations 2 respondents had no comments, 2 were objections, 4 of the representations were supports and 5 were comments.

5.2 The main issues raised include:

- SPD is welcomed to conserve, and where appropriate enhance, conservation areas
- Important to protect appearance of historic towns and listed building
- Some of the existing shopfronts require improvement
- More action needed on removal of A-boards

- Signage and advertising relating to shopping centres should be considered separately.

5.3 A summary of the consultation responses is set out in the schedule below. This table outlines the comments by topic, the Council's response to these issues and any consequential changes to the SPD. If text is to be deleted from the draft SPD it is shown ~~struck through~~. If new text is to be inserted it is shown underlined.

Rep No.	Topic/Section/para. Number	Support or Object	Issue	Officer Response	Proposed modification
<b>General Comments</b>					
4 - G. Gaunt	Purpose of SPD	Object	Object to the decision to produce a Shop Frontage SPD when over 2,000 people have objected to proposals to develop on Green Belt East of Stevenage. Concerned about impacts on congestion and loss of trees along Gresley Way.	Noted  Development on land East of Stevenage is outside the scope of this SPD. However, it is an allocated site (EOS1) in the adopted District Plan (2018), which was robustly assessed and examined by an independent planning Inspector.	No amendment in response to this issue.
14 - G. Gaunt	Purpose of SPD		With regard to signage on listed buildings such as those in Buntingford, it is obvious that these must be in keeping with the age of the building and nor garish or illuminated.	Noted - The SPD provides guidance on how to ensure signage is in keeping with listed buildings in East Herts.	No amendment in response to this issue.
5 - A. Taylor	Purpose of SPD	Support	Agrees with SPD. Important to protect the appearance of historic towns, but ensuring changes are in keeping with surroundings. Hertford is particularly struggling as many of the shopfronts are ugly and out of character. Any shutters should be internal.	Support noted	No amendment in response to this issue.
7 - C. Robinson	Purpose of SPD		Supports the policy approach but must start with the Library	Noted - All future planning applications or listed building	No amendment in response to this

			Service, whose signs are not in keeping with the historic character of Buntingford and Letchworth.	consents for works to or for new shopfronts and advertisement consents for the display of signage in East Herts will need to take into account the guidance in this SPD, once it is adopted.	issue.
8 - Natural England	No comment		Considers that topic of SPD does not appear to relate to interests of Natural England to any significant extent. Outlines the requirement to consult Natural England about whether an SEA of the SPD is required.	Noted  The Council has consulted Natural England specifically on the SEA screening report and Natural England has confirmed it has no comments.	No amendment in response to this issue.
13 - Hertfordshire County Council	No comment		No comments to make on the draft SPD	Noted	No amendment in response to this issue.
9 - Hertford Town Council	Purpose of SPD and additional guidance	Support	Very supportive and hopes it will help retain unique historic nature of Hertford. Note that some modern signage in Hertford Town centre lacks proportionality, hopes that this document will strengthen what's placed on windows of retail frontages and that Hertford Town Council promote their good quality retail frontages better. Would like to see District Council produce information guides promoting good practice	Support noted.  The Council already has a heritage guidance note relating to shopfronts to provide information and advice.  This SPD provides further good practice. Once adopted it will be a material consideration in the consideration of planning applications and listed building consent.	No amendment in response to this issue.

			guides for retail frontages as they have done in the past for other issues (e.g. thatching).		
10 - Historic England	Purpose of SPD and additional guidance	Support	<p>Welcome production of SPD and the Council's emphasis on the conservation and enhancement, where appropriate, of the District's retail frontages in conservation areas. Do not have capacity to make detailed comments but make the following general comments:</p> <ul style="list-style-type: none"> <li>- Would welcome reference to Historic England's Advice Note 2: Making Changes to Heritage Assets, the info will underpin and reinforce your SPD guidance.</li> <li>- Welcome Council's commitment to enforcement and refer the Council to Historic England's 'Stopping the Rot' advice note for further information.</li> <li>- A bibliography could be included in the historical background section, which could signpost further information for those interested, e.g. Kathryn</li> </ul>	<p>Support noted.</p> <p>Recognise that the Historic England documents provide useful background information and reference to Advice Note 2 would be useful in the SPD.</p> <p>Note the reference to the enforcement Advice Note. Whilst acknowledging the book referenced may provide useful background guidance, it is not government guidance or industry good practice so it is not necessary to include reference in the SPD.</p> <p>Acknowledge that the NPPF was updated in February 2019 and the text should refer to the most recent version.</p>	<p>Insert additional text at the end of paragraph 4.6, as follows:</p> <p><u>Historic England's Advice Note 2: Making Changes to Heritage Assets (2015) provides further guidance regarding changes to frontages in conservation areas, or to listed buildings:</u></p> <p><u><a href="https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/">https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/</a></u></p> <p>Amend reference to the NPPF as follows:</p> <p>National Planning Policy Framework (20189)</p>

			<p>Morrison's 'English Shops and Shopping: an architectural history'.</p> <ul style="list-style-type: none"> <li>- Note that the SPD refers to NPPF 2018, and highlight it was more recently updated in March 2019.</li> </ul>		
<b>5. What to take into account</b>					
11 - Legal & General Investment Management	Modern Design (5.5-5.7)		<p>Consider that the draft SPD should recognise the important role of shopping centres within East Herts. Should acknowledge the opportunity for shopping centres to accommodate signage and advertising that may not be suitable on other retail frontages within the district's town centres.</p> <p>As such, signage and advertising that relates to shopping centres within the district's town centres should be considered on its own separate merits and this should be acknowledged within the SPD.</p> <p>There is significant</p>	<p>The SPD is not against contemporary design and paragraph 5.7 notes that not all modern design is negative. Therefore proposals for modern signage will be considered within that context.</p> <p>Shopping centres located in the conservation areas should not be treated any differently to other retail frontages.</p>	No amendment in response to this issue.

			opportunity to deliver more modern forms of advertising within the district's town centres, provided that they are sympathetic to the scale and character of the building they relate to and areas within which they are located. For example, at Jackson Square in Bishop's Stortford		
<b>6. Shopfront Design Advice</b>					
3 - Buntingford Town Council	Fascias and fascia signs (figure 24)	Support	Figure 24 (a) has no text attached to it	Noted	Insert the following caption under the photo in Figure 24:  <u>Hand-painted lettering to the original fascia. The font may be a little large in part.</u>
12 - Legal & General Investment Management	Illumination (6.41-6.43)		Illumination- Acknowledge that advertisement with illumination is generally considered inappropriate, particularly on historic streets. However, consider that as Shopping Centres form a key part of the retail offer in the heart of the town centre, a bespoke approach to advertising at their entrances is required.  Particularly where shopping	As stated, the SPD is not against contemporary design and notes that not all modern design is negative. Therefore proposals for modern signage will be considered within that context.  As with all retail frontages, signage and advertising in porticos will be assessed in terms of their impact on the character of conservation area. The SPD makes it clear that	No amendment in response to this issue.

			centres within the district (including Jackson Square) have porticos at their entrances and often do not face directly onto the street scene, there is an opportunity to accommodate carefully positioned signage and advertising that should be considered separately to general shopping frontages.	retail frontages should be considered on its specific location in terms of the building, street or wider areas. Specific guidance for shopping areas is unnecessary.	
2 - C. Jones	A-boards and Banners (6.48)		Fully accepts content of this SPD; however it is of limited use if the Highway authority does not take action against A-Boards cluttering the street or against vehicles using restricted streets. East Herts should also correct past mistakes of unacceptable shop fronts that it has approved.	Noted  Does not apply to retrospective decisions. Moving forward this SPD will provide greater clarity to enforce against inappropriate changes to shopfronts.  Paragraph 6.48 of the SPD refers to A-boards and the role of the highway authority in the removal of these. Any further detail about this or about parking is beyond the scope of this document.	No amendment in response to this issue.
1- R. Haswell	A-boards and Banners (6.48)	Object	Would like the removal of all 'A Signs' from Bishops Stortford because they are dangerous and cause a hazard.	The purpose of this SPD it to provide guidance on the retail frontages of buildings, not the street scene.  The use of A-boards is	No amendment in response to this issue.

				<p>controlled by Hertfordshire County Council (HCC) as Highways Authority, not East Herts Council. They are permitted as long as specific guidelines relating to size and location are followed. Misuse can be reported to HCC, who can remove if necessary.</p> <p>Paragraph 6.48 of the SPD refers to A-boards and the role of the highway authority in the removal of these. Any further detail is beyond the scope of this document.</p>	
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## **APPENDIX A: CONSULTEES**

The following organisations were directly notified of the draft Retail Frontages: Design and Signage SPD in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). It should be noted that individuals on the planning policy consultation database were also consulted, but are not listed.

### **Specific Consultation Bodies and/or Duty to Cooperate Bodies**

- Affinity Water
- Anglian Water
- The Civil Aviation Authority
- Communication Operators
- EDF Energy Networks
- Environment Agency
- Essex County Council
- Great Anglia
- Hertfordshire Constabulary
- Hertfordshire County Council
- Highways England
- Hertfordshire Local Enterprise Partnership
- Historic England
- Homes and Communities Agency
- Lee Valley Regional Park Authority
- National Grid
- Natural England
- Network Rail
- NHS East and North Hertfordshire CCG
- NHS West Essex
- Neighbouring Authorities: Broxbourne Borough Council, Epping Forest District Council, Harlow District Council, North Hertfordshire District Council, Stevenage Borough Council, Uttlesford District Council
- Police and Crime Commissioner
- Stansted Airport
- Thames Water
- The Coal Authority
- The Princess Alexandra Hospital NHS Trust

- Veolia Water

<b>East Herts Town and Parish Councils</b>	
Bishop's Stortford Town Council	Hertford Heath Parish Council
Buntingford Town Council	Hertingfordbury Parish Council
Hertford Town Council	High Wych Parish Council
Sawbridgeworth Town Council	Hormead Parish Council
Ware Town Council	Hunsdon Parish Council
Albury Parish Council	Little Berkhamsted Parish Council
Anstey Parish Council	Little Hadham Parish Council
Ardeley Parish Council	Little Munden Parish Council
Aspenden Parish Council	Much Hadham Parish Council
Aston Parish Council	Sacombe Parish Meeting
Bayford Parish Council	Standon Parish Council
Bengeo Rural Parish Council	Stanstead Abbots Parish Council
Benington Parish Council	Stanstead St Margarets Parish Council
Bramfield Parish Council	Stapleford Parish Council
Braughing Parish Council	Stocking Pelham Parish Council
Brent Pelham and Meesden Parish Council	Tewin Parish Council
Brickendon Liberty Parish Council	Thorley Parish Council
Buckland and Chipping Parish Council	Thundridge Parish Council
Cottered Parish Council	Walkern Parish Council
Datchworth Parish Council	Wareside Parish Council
Eastwick and Gilston Parish Council	Watton-at-Stone Parish Council
Furneux Pelham Parish Council	Westmill Parish Council
Great Amwell Parish Council	Widford Parish Council
Great Munden Parish Council	Wyddial Parish Meeting
28 Other Parish Councils outside of East Herts	

<b>General Consultation Bodies and Other Organisations</b>	
Aldwyck Housing Group Ltd	Hertfordshire Community Health Services
Bat Conservation Trust	Hertfordshire Gardens Trust
Bellway homes	Hunsdon Eastwick and Gilston Neighbourhood Plan Group
Beds and Herts Local Medical Committee	Hutchinson 3G UK Limited
Bishops Stortford Methodist Church	Ian Baseley Associates
Bishop's Stortford District Footpath Association	Jarvis Homes Ltd
Bishop's Stortford Chamber Of Commerce	Labour Party
Bishop's Stortford Liberal Democrats	Layston Pre-School and Nursery
Bishop's Stortford Mencap	Leach Homes
Bishop's Stortford Town Centre Management Partnership	Leaside Church

British Horse Society	Leaside Under 5's Kindergarten
British Telecommunications plc	Lee Valley Regional Park Authority
British Waterways	Linden Homes
Building Research Establishment	Linden Homes Eastern
Buntingford Chamber of Commerce	McMullen & Sons Ltd
Buntingford Civic Society	Mobile Operators Association
Buntingford Town Partnership	Molewood Residents Association
CABE	National Express East Anglia
Canal & River Trust	National Farmers Union
Carers in Hertfordshire	National Federation of Gypsy Liaison Groups
CBI East of England	Network Homes
CDA for Herts	North East Herts Labour Party
Chaldean Estate	North Hertfordshire Homes
Christ Church C of E (VA) Primary & Nursery School	Openreach Newsites
Church Commissioners	Orange Personal Communications Services
Circle Anglia	Origin Housing Association
Coke Gearing Consulting	PACE
Community Safety & Crime Reduction Department, Herts Constabulary	Paradigm Housing Group
Countryside Management Service	Paradise Wildlife Park
CPRE Hertfordshire	Parsonage Residents Association
Croudace Homes	Parsonage Surgery
Department for Transport Rail Group	Pelham Structures Ltd
Diocese of St Albans	Persimmon Homes
DPDS Consulting Group	Pigeon Investment Management Ltd
East Herts Ramblers	Plainview Planning Ltd
East of England Ambulance Service NHS Trust	Planning Potential
East of England Development Agency	RSPB
East of England Local Government Association	Salvation Army Bishop's Stortford Corps
Essex County Cricket Board	Sanctuary Carr-Gomm
Fairview New Homes	Sanctuary Hereward
Fields In Trust	Savills
First Capital Connect	Shelter
Forebury Estates Ltd	South Anglia Housing Association
Forewind Ltd	Sport England
Framptons	St Joseph's RC Primary School
Freight Transport Association	St Michaels Church
Friends, Families and Travellers and Traveller Law Reform Project	Standon and Puckeridge Surgery
Garden History Society	STANDonA120 campaign
Gascoyne Cecil Estates	Stevenage Liberal Democrats

Gladman Developments	Stewart Ross Associates
Good Architecture/ Transition Hertford	STOP Harlow North
Grange Builders	Strategic Planning Research Unit, DLP Planning Ltd
Granta Housing Society Ltd	Strutt & Parker
Hanover Housing Association	Sustrans
Hastoe Housing Association Ltd (East)	Telefonica O2 UK Ltd
Hatfield Town Council	Tesni Properties Limited
Haymeads Residents' Association	Thakeham Homes
Hazel End Farm	The Bishop's Stortford High School
Hertford Disability Support Group	The Canal and River Trust
Hertford Heath Primary School	The Gallery at Parndon Mill
Hertfordshire Action on Disability	The Georgian Group
Hertfordshire Association of Parish and Town Councils	The Gypsy Council
Hertingfordbury Conservation Society	The Lawn Tennis Association
Herts & Middlesex Badger Group	The Princess Alexandra Hospital NHS Trust
Herts & Middlesex Wildlife Trust	The Theatres Trust
Hertfordshire Building Preservation Trust	The Traveller Law Reform Project
Hertfordshire Chamber of Commerce & Industry	The Ware Society
Hertfordshire Community Health Services	The Woodland Trust
Hertfordshire Gardens Trust	Theatres Trust
Hertfordshire Police Authority	Wallace House Surgery
Herts & North Middlesex Area of the Ramblers	Ware Town Partnership
Herts Sports Partnership	Wareside C of E Primary School
Hightown Praetorian and Churches Housing Association	Watermill Estate Residents' Association
Hill Residential	Wates Developments
Hockerill Residents Association	Wattsdown Development Limited
Home Builders Federation	Welwyn Garden City Society
Home Farm Trust Herts & Essex	Wodson Park Sports Centre
Housing 21	Woodhall Estate
Hertfordshire Building Preservation Trust	
Hertfordshire Chamber of Commerce & Industry	