

## Appendix 2 Representations received during public consultation 19<sup>th</sup> July - 30<sup>th</sup> August 2013 and Changes made to Shop Front Design Guidance following consultation

### **Explanatory Note:**

*This document sets out a summary of the representations received during the consultation stage of the Peterborough Shop Front Design Guidance together with the Council's proposed changes. This is a public document, and helps meet Peterborough City Council's commitment to consult and keep people informed of progress on planning policy documents that form part of the Peterborough Planning Policy Framework.*

### **1. Introduction**

- 1.1. Peterborough City Council wishes to thank all those who took the time between 19<sup>th</sup> July and 30<sup>th</sup> August to comment on the draft Peterborough Shop Front Design Guide.
- 1.2. When adopted, the guide will have the status of a Supplementary Planning Document (SPD). It will form part of the city council's planning policy framework, supplementing the design policies of the adopted Peterborough Core Strategy Plan Document (DPD) and Peterborough Planning Policies DPD. The guide will have status as a material consideration in the determination of planning and advertisement applications. The guide is particularly of relevance to policy CS16 of the Core Strategy DPD, which deals with Urban Design and the Public Realm, and policies PP11 and PP17 of the Planning Policies DPD, which deal with Shop Frontages, Security Shutters and Canopies and with Heritage Assets where work would affect a conservation area, listed building or locally listed building.
- 1.3. This document is to highlight to everyone a summary of what was said and how we propose to take those comments forward in a list of proposed modifications to the draft document.
- 1.4. On the following pages, we set out in a standard format the comments received and the Council's proposed response.
- 1.5. All comments received have been read and considered in detail.
- 1.6. The Council wrote to all retail properties in the Peterborough District as well as other interested parties, including planning agents, architects, Peterborough Civic Society, main landowners, English Heritage, Parish Councils, Ward Councillors, Cowgate Traders Association and Queensgate Management Centre. The draft document was available for viewing or downloading from our website and reference copies were available at libraries and at Bayard Place Reception Central Library and Planning Services. We received 8 responses.

## 2. Consideration of the issues raised

Respondent	Comments	Response	
Planning agent	The document seeks to control new shop fronts but (PCC) has lost control of existing shop fronts, e.g. Millfield area, graffiti type posters etc.	<p>The shop front design guide will promote high quality design standards within all retail areas of the city to create settings in which retailers can establish successful businesses and attractive environments for residents and visitors.</p> <p><b>Action taken - none</b></p>	
John Middlemass (Architectural Liaison Officer, Cambridgeshire Constabulary)	<p>Support provided by Cambridge Police in relation to the wording for the majority of Section 10 (Security)</p> <p>10.1 Final Sentence. (CCTV in shopping areas) - Not all areas of the City Centre shopping area are covered by CCTV at all times; the adequate monitoring of CCTV in the future cannot be guaranteed. This sentence should be removed. Deal with the adequacy of monitored CCTV coverage on a case by case basis.</p> <p><i>Advised to add: - Any application to install shutters or grilles will be expected to evidence the crime history or future crime risk assessment for the property</i></p> <p>.</p> <p>This may place the emphasis upon the applicant to evidence a need for shutters making them fully consider that requirement or other alternatives first.</p> <p>If adopted, I can provide assurances that each application, will be fully considered by Cambridgeshire Constabulary, providing guidance in relation to its vulnerability to crime and aesthetics, commensurate to its context and crime risk.</p>	<p><b>Action taken</b> – Para. 10.1 last sentence deleted and replaced with “Any application to install external shutters or grilles will be expected to evidence the crime history or future crime risk assessment for the property”</p>	

Respondent	Comments	Response	
David Grech, Historic Places Adviser. English Heritage	<p>The content covers all the common failings. The illustration at the end of Section 5 shows a 'bad' shop front that straddles two older properties and a 'good' alternative, where the shop front is divided between the two units. While I have no problem with this, I can see a shopkeeper complaining about the loss of display space and identity etc., and experience on Cowgate shows that it is possible for the shop fronts to abut at the join of the two buildings (with a double pilaster). If a third illustration was included showing that it was acceptable to have a shop front the full width of each unit and abutting on the line of the party wall, then that may go a long way to addressing some shopkeepers concerns.</p>	<p><b>Action taken</b> – Line drawings at 5.0 moved to 6.9 and third illustration included to show how a shop unit can successfully straddle two buildings. Further sentence added to explain this point.</p>	
Architect	<p>An excellent document. A suggestion on shutters: I have installed post box roller shutters as illustrated in the document but on the inner face of the wall, running down the inner face of the glazing. This is far more satisfactory from the point of view of streetscape as the roller is behind the line of the fascia and is invisible, the reflections from the glass are uninterrupted so the grille does not "read" externally, but the building remains secure. Perhaps internal roller shutters could be illustrated as well as, or instead of external roller shutters. Perhaps a higher spec of security glass could also be proposed to retailers who are worried about security.</p>	<p>Detailed advice on a specification of security glass can be provide in conjunction with Cambridgeshire Police in any discussions with shop owners and tenants</p> <p><b>Action taken</b> – Re-ordering of illustrations at 10.2 and one picture (of three) showing external roller shutters is deleted. Additional final sentence added at 10.3. Additional cross-section drawing showing internal roller grille to supplement photograph showing an internal grille.</p> <p>Para 10.5 states “Toughened and reinforced laminated glass, internal brick bond style shutters and traditional stallrisers to improve the security of shop fronts can be supported”.</p>	

Respondent	Comments	Response	
Resident	<p>An informative document.</p> <p>It is encouraging to note that the City Council are taking seriously the issue of shop frontage. Congratulate you on the work that has taken place in Cowgate and also in Cathedral Square, but do not neglect Broadway or Long Causeway.</p> <p>Millfield/Lincoln Rd is a visual issue with poor signage attached to what are Victorian houses. I assume this document will be City wide and not just limited to the City Centre?</p>	<p>The introduction states in the first paragraph that the SPD provides guidance to improve the standard of shop front design and advertisements “throughout Peterborough”</p> <p><b>Action taken - none</b></p>	
Resident	<p>The only comment I wish to make is that you require that any design retains recessed entrance doors but, quite rightly, you discourage the use of shutters, especially in conservation areas.</p> <p>The problem with recessed doorways is that they are used by certain, presumably homeless persons, as overnight shelters, toilets etc. This is unsightly and distressing for passers-by and shop staff who have to deal with the consequences in the morning.</p> <p>I also understand that it is DCLG guidance that recessed doors are discouraged for just this reason.</p> <p>My preference would be that the doors are not recessed to discourage their use overnight and so that unsightly shutters are not required.</p>	<p>Recessed doorways are a common feature in traditional shop fronts and the guidance seeks to retain existing recessed entrance doors in new work. (They allow for an increased window area and a larger display. They can also be used to provide a level access by bridging any change in level between the shop floor and the street level).</p> <p>The guide needs to balance retaining this traditional feature with avoiding anti-social activity. Security proposals (grilles and shutters) to achieve this should be an integral part of the shop front design.</p> <p>No information on DCLG guidance found.</p> <p><b>Action taken - none</b></p>	

Respondent	Comments	Response
Councillor	<p>Include a clause which states that the shop front must reflect the age in which the shop was built and the materials available then. E.g. a Victorian building would have a Victorian frontage using Victorian colours and materials. Post 1960 could use modern materials and frontage unless special circumstances exist e.g. if it has a fake Elizabethan frontage. This would make the city a more up market and interesting place. Tourism and trade would increase.</p>	<p>The aim of the comment is exactly what the guide seeks to achieve. Paragraph 5.3 states "The style which a new shop front should take will vary depending on the age and type of the building. A well designed shop front will complement the building and enhance the character of the street". This could be a traditional or modern design.</p> <p>Para 5.5 goes on to explain the correct design approach in relation to the host building with a photograph of the south side (Victorian age) of Cowgate where we have recently introduced two shop fronts in traditional style to reflect the host building. The draft Policy SF1 provides flexibility for innovative and modern designs where appropriate to the host building.</p> <p>The SPD is a guide only and should assist in retail units presenting an attractive and enticing frontage in order to increase custom and in turn make the city and attractive place to residents and visitors alike.</p> <p><b>Action taken – None</b></p>

Respondent	Comments	Response
Peterborough Civic Society	<p><b>General comment and concern.</b></p> <ul style="list-style-type: none"> <li>• A comprehensive, lengthy document which covers a lot of ground well covered in similar guides. Much local content which justifies its publication. However, the policies are highly detailed and comprehensive but too backward looking and will not encourage innovative modern design which may be appropriate in some parts of the district. This manifests itself in two ways. There is such frequent reference to Conservation Areas and historic assets that it implies that the advice does not apply to other areas. Conversely, are all areas really expected to adopt all the same standards?</li> <li>• Secondly, it is lacking in good examples of shop fronts where the upper part of the building is not of a traditional multi-bay type. There are such buildings in the City Centre conservation area and elsewhere and good practice for them deserves a mention. We strongly urge that these omissions are addressed.</li> </ul> <p>Specifically:</p> <ul style="list-style-type: none"> <li>• <b>Para 1.1</b> states that it is not intended to be prescriptive but in its entirety it is prescriptive. We suggest the insertion of 'overly'</li> <li>• The Introduction is clear and comprehensive.</li> <li>• <b>Part 5.</b> The illustration at end of part 5 is not very helpful where a single retail unit design is required straddling two or more individual buildings. As this is a frequently occurring problem we suggest that the illustration is revised and some pointers given which will enable the retailer to convey the extent of his establishment,( e.g. through common colour schemes, materials etc.) rather than trying to fragment it always with exclusive reference to the vertical relationships.</li> </ul>	<p>There are several references to modern shop front design and its appropriateness in historic areas. Revised design principles are not specifically referenced to conservation area and historic assets. The SPD is a guide and promotes the use of innovative and modern design where appropriate so long as they are of a high standard of design. To address the concern that the guidance is backward looking and would not encourage modern design a number of changes are made:</p> <p><b>Action taken -</b></p> <ul style="list-style-type: none"> <li>• Where appropriate, the word 'must' is substituted with 'should' / 'where possible' or 'where appropriate' to increase the idea of flexibility</li> <li>• Front cover revised to show examples of a broad range of shop fronts from traditional to modern to give balance.</li> <li>• Key summary boxes have been revised from policy criteria that need to be met to obtain permission to statements on design guidance that should be followed to increase flexibility.</li> <li>• Paras. 1.1 and 5.3 minor revisions to text to emphasise that the document is a guide and is not intended to be prescriptive</li> </ul>

Respondent	Respondent's Comments	Proposed response	
	<p><b>SF1.</b> In subsections (i) to (vi) the first five should all be ended with the word 'and' to make clear that all the aspirations have to be addressed. Under (iii) bullet 4 How is 'ground floor level' defined? Do you mean the ground floor ceiling? (see also 6.10) (ii) and (iv) referring to retaining features. Is there any planning control over such features if they are not on a Listed Building? Would this be 'demolition'?</p> <p>Generally this policy is too restrictive and would stifle good innovative designs. It reads as if a design approach for listed buildings and heritage assets is to be applied everywhere. Minor point re drawing page 7: Position of letter plate is not to be recommended!</p> <p><b>6.8</b> None of these illustrated are particularly 'modern' or stylish. <b>6.9 and 6.20 illustration.</b> Too much detail and some of it contentious. Mock traditional detail not applicable to modern buildings</p> <p><b>SF2.</b> We doubt that the policy is sufficiently clear and capable of being sustained. Eg (iii) colour changes do not always require permission. <b>SF3.</b> Surely lettering style and content of info on non-illuminated fascias or projecting signs does not come within planning control? If so words like 'strongly encourage' should replace 'permitted'. General comment on Policies SF1 to SF5. Slightly different wording is used on a number of these. SF1, SF2 and SF5, 'permission.....will only be granted if:' SF3 and SF4 'will be permitted if:' In each of the policies it is not clear whether all of the requirements have to be met in order for permission to be granted. If so then perhaps it would be clearer if something was added to that effect. 'Permission will only be granted when all of the following requirements are met:'</p>	<ul style="list-style-type: none"> <li>• (Part 5 – See E.H. comment and response – the three illustrations are moved to 6.9)</li> <li>• Para. 6.8 (Modern shop fronts) new text added to explain that modern designs are encouraged and that these can be successfully incorporated into traditional building facades. New photographs of examples of modern shop fronts replace previous examples.</li> <li>• Illustration at 6.9 deleted and replaced by photograph with line drawing to better illustrate the design point</li> </ul>	

The following additional changes are made to improve the guidance:-

- Para. 1.5 text change (Committee date and decision to follow)
- Minor text revisions at paras. 6.6, 6.15
- Para. 6.20 additional sentence (Windows & glazing)
- Para. 7.4 replaced photographs (2) (Colour)
- Para. 8.15 deleted photographs (2) (Lighting)

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