

SPD Consultation (Shopfronts)
Rotherham MBC
Planning Policy
Regeneration & Environment Services
Riverside House
Main Street
Rotherham S60 1AE

8 October 2019

Dear Sir/Madam,

Rotherham MBC – Shop front design guide SPD - Draft - October 2019

These representations are submitted on behalf of the British Sign and Graphics Association (BSGA) in response to the above draft SPD.

The BSGA represents 65% of the sales of signage throughout the UK and monitors development plans throughout the country to ensure that emerging Local Plan Policies and Supplementary Guidance do not inappropriately apply more onerous considerations on advertisements than already apply within the NPPF, Planning Practice Guidance (PPG) and the Town and Country Planning (Control of Advertisements)(England) Regulations 2007 (as amended).

This SPD proposes additional guidance on the adopted policies in the Sites and Policies DPD. We commented previously on (what is now) Policy SP 60; but following amendments to the Submission Draft, we were content that the policy accorded with national policy and practice guidance. We have now carefully examined the proposed guidance in this draft SPD and are extremely concerned that it by far exceeds the policy on which it is supposedly based; that it exceeds what is permitted in law; that it is impractical and unrealistic; that it totally fails to take account of the actuality of Rotherham's shopping environment; and that its requirements are unduly onerous and excessive.

We consider that the main difficulty with the SPD is its emphasis on "traditional" shopfronts (as opposed to "modern"). As examples, we would point to the fact that all the photographs and diagrams in the SPD show "traditional" shopfronts – there is not a single example of what the Council consider to be a quality modern shopfront, despite the town centre being, we would estimate, comprised of almost 90% modern shopfronts (i.e. those that lack pilasters etc but have large plate glass windows above minimal stall risers). And this is despite paragraph 2 of the SPD which refers to "the provision of contemporary designs with flair" and paragraph 22 "New shopfronts of an imaginative and creative design are encouraged".

Further, the emphasis on avoiding internal illumination is contradictory (within the SPD itself, see below) and fails to reflect the reality that internal illumination is the most common form of fascia sign within the town centre. The SPD fails to take account of innovation in sign design. In particular, there is no mention whatsoever of LED illumination. The smaller size of the luminaries, their long life and their minimal heat generation allows modern “box” signs to be much slimmer and more versatile than their “neon” tube illuminated predecessors. These signs needed thickness in the depth of the box to allow for the bulkier tubes and their fittings, as well as to allow heat to dissipate. Moreover, the SPD fails to recognise that internal illumination allows light to be very carefully directed (eg through letters/logo only), whereas external illumination necessarily casts light not only onto the sign but also its surrounds. It also often produces an uneven light spread which is itself unsatisfactory both for the retailer and the street scene.

As to specifics, paragraph 12 needs to recognise that “blinds” may not require planning permission. If they contain advertising material, they must be treated as advertisements (including the blind itself and its operating mechanism etc). In the case of a standard retractable blind usually fixed just above the fascia (and not lit), this would have deemed consent under Class 5 in Schedule 3 to the Regulations and would require neither planning permission nor express advertisement consent.

Paragraph 15 is incorrect. Many illuminated signs may be displayed with deemed consent under the provisions of several of the Classes in Schedule 3 (particularly Classes 4A, 4B and 5) What does “extra-large” mean? And some signs above ground floor level are also permitted, viz signs on the flank walls of businesses which have no upper floor windows. We suggest that the first sentence of this paragraph be deleted, and that the advice be left to the Government booklet which is fairly comprehensive and correct.

In paragraph 17, the section on “Drawings” should make clear that the required details will vary depending upon what sort of application is required. For instance, there is no requirement for an access statement for an application for advertisement consent.

In the first sentence of paragraph 22, there is an implied assumption that standard and “corporate” designs should be adapted and modified to suit the character of the building. But this is not necessarily so. There are often shopfronts, buildings and locations where “corporate” styles can be displayed as proposed without any need for particular modification. We suggest that the wording in the first sentence be modified. “and it is recommended” should be deleted and replaced with “. Corporate images and designs may need to be adapted to suit the particular character and design of the shopfront and building.”

Paragraph 22 is contradictory. The final sentence of the first block of text states that new shop fronts **may** be complimentary to the proportion, scale etc of the host building. This is immediately contradicted by the first bullet point which states that the shop front **should** harmonise with the age and character of the host building. “**May**” is correct. Most shopfronts in Rotherham do not harmonise with the age or character of their host buildings.

Look at College Street. Virtually all the shopfronts are unmistakably modern – “plastic” fascias and large expanses of plate glass windows abound. None of this is contemporary with the age and character of the host buildings as seen above the shopfronts. This will generally only be relevant where “traditional” shopfronts are proposed or altered. This bullet point should be deleted. The rest of the bullet points are adequate to cover scale and proportion.

In the same paragraph, bullet point 6 needs to be amended. The regulations do not permit local authorities to control the content of any sign, unless it actually affects amenity or public safety. And this cannot be achieved by generality. Each sign must be individually considered, and this is not a suitable vehicle for policy guidance. It is not the Council’s business to decide what is “reasonably required” to advertise the business. Consent cannot be refused simply because the Council consider the sign’s content to be “unnecessary” in principle. This bullet point is contrary to the law and national planning practice (PPG ID 18b-026-20140306) and should be deleted.

In the same paragraph, bullet point 7 should be deleted. It contradicts other sections of the SPD and, for the reasons given above and below, is impractical, unrealistic and has no basis or justification in fact. It is pure prejudice.

The example of “successful” shop front design on pages 7 and 8 again shows only the “traditional” and fails to recognise the reality that such designs are rare in Rotherham; and that any attempt to install such designs will almost inevitably result in the “pastiche” shopfronts which paragraph 22 advises should be avoided.

In the first sentence of paragraph 24, “normally” should be inserted after “should”. There may well be circumstances where a fascia sign may exceed 20% of shopfront height. The sign will need to fit the fascia. This would also follow paragraph 23’s “normally” which properly allows for exceptions.

In paragraph 26, the advice on the sign’s content should be deleted for the reasons given above. There is no justification for this as a general requirement. With College Street again as an example, what is wrong with “Specsavers – Opticians” or “Greenwoods – Menswear – Suit Hire”? The third sentence of this paragraph should be deleted.

Paragraph 27 is totally unacceptable. We understand and agree with the intention of this paragraph. Older types of bulky fascia signs are no longer widely used (for the reasons given above, LEDs are now widely used). The “box” does not therefore need the thickness of older signs. We think that the paragraph might be better expressed as:

“Bulky projecting box-like fascia signs, crudely attached over existing fascia boards, will not be acceptable.”

In paragraph 28, what is “professional” lettering?

The section on “Hanging and Projecting (not “projected”) Signs” is again entirely unacceptable. In Rotherham’s central shopping area, there are many examples of projecting signs fixed to the fascia panel, many of them also internally illuminated.

These are wholly visually appropriate to the style and design of the contemporary shopfronts on which they are displayed. As with fascia “box” signs, projecting signs are now commonly slimline, even if internally illuminated. And the advice in this section contradicts that in paragraph 50 where such signs are said to be acceptable. We consider that the third bullet point should include “on the fascia panel” as an acceptable location for a projecting sign; and that bullet points 4 and 5 should be deleted.

In paragraph 45, “internally illuminated fascias are not acceptable as they create excessive glare” is incorrect and should be deleted. This might be replaced with: “fascia signs with fully illuminated backgrounds (as opposed to illumination through letters/logo-only) will rarely be acceptable as these can produce excessive glare, particularly if the background colour is light, bright or garish.”

In paragraph 46, LED illumination should be included.

Paragraph 47 describes letters/logo only illumination and seems to suggest that it is acceptable, contrary to paragraph 45! It may not be possible/practicable to recess light boxes behind the fascia (in more modern buildings, the fascia is often a concrete beam). But this may be compensated by the slim nature of modern boxes. We suggest that the last sentence of this paragraph be replaced with:

“Where possible and practicable, the light box should be recessed within the fascia panel. Where this is not possible, the light box must be slim and have a minimal projection from the fascia panel.”

In paragraph 49, “Cool” cathode tubes do not exist! They are “Cold” cathode tubes. We see no reason for the restriction on the “colour and palette” of such signs. Unless this can be justified, we suggest that this restriction is unnecessary and should be deleted.

Paragraph 50 accepts that modern internally illuminated “box” signs can be wholly acceptable. But we suggest that this paragraph might be more clearly expressed as:

“Excessively bulky, old-fashioned box signs are unlikely now to be acceptable. More modern, well-crafted, elegant box signs, particularly those employing thin fluorescent tubes or LEDs, with illumination restricted to lettering and/or graphics, are likely to be acceptable on contemporary shopfronts in shopping areas.”

In paragraph 52 “Materials and Decoration”, in bullet point 3, the use of “acrylic, Perspex, plastic” should be qualified. “Perspex” is a registered trade name and needs to be capitalised. Some of the signs expressed as acceptable within the SPD are necessarily at least part acrylic or Perspex. They are suitable materials for the faces of letters and graphics illuminated from within. We think that this bullet point might be better expressed as:

“Avoid the use of large areas of glossy acrylic, plastic and Perspex sheeting”

In the same paragraph, in bullet point 9, it is wholly unreasonable for a business to be restricted in its choice of colour because of its (no apostrophe!) neighbour's choice. Shopping streets are inevitably brightly coloured (which adds interest and vitality). They are never "colour-coded". Nor, in the generality, should they be. How will the Council control the decoration and deemed consent advertisement choice of all the retailers in a street? They cannot and should not. This is not (yet) a nanny state. This bullet point should be deleted.

We are aware that the SPD is for guidance on best practice; and that economic circumstances may dictate reality. But we think that the more permissive the guidance, the more likely it is that it will be used (not least because the more widely used types of signs are necessarily cheaper). Small, incremental improvements must be more welcome than absolute disregard for a document which does not reflect reality.

Yours faithfully

Chris Thomas
for British Sign & Graphics Association