

To be Retained by ISA-UK



Consultation Period: 14/2/22 **To:** 13/3/22
Development Plan: Shopfront Design Guide SPD – Second Draft
District: Great Yarmouth BC
Relevant Policies: Passim
Or Narrative (refs): Passim

Background: This is the second draft of this SPD which is supposedly to cover only conservation areas and listed buildings – but much is written in very general terms; and I think the Council will try to use it throughout the borough.

It is typically written as a description of what Council planners think of as “The Old Curiosity Shop”. Plastic materials, gloss paint, internal illumination, window posters, corporate branding and brightly contrasting colours are all to be avoided. Presumably copperplate hand-painted lettering (shop name only) in matt light brown on a matt dark brown ground is de rigeur!

We objected to virtually all of the planner-speak in the first draft. As is typical, the Council have made virtually no changes – certainly none of real substance.

Comment: We have objected yet again to all the rubbish. But I expect little. My advice to ISA-UK members would be simply to ignore it.

Date sent to Council: 16/2/22

Development Plan Monitoring

Strategic Planning – by email
Great Yarmouth BC
Town Hall
Hall Plain
Great Yarmouth NR30 2QF

16 February 2022

Dear Sir/Madam,

Great Yarmouth BC – Shopfront Design Guide
Second Draft - February 2022

1. These representations are submitted on behalf of the British Sign and Graphics Association (BSGA) in response to the above second draft SPD. We commented on the first draft of this SPD in August 2021 and we have examined your responses in the Consultation Statement.

2. We remain concerned that the this SPD continues to apply far 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). Our comments relate to the parts of the SPD which concern “advertisements” in the statutory definition.

3. The Introduction to this draft SPD explains that its additional guidance on the design of shopfronts and advertisements is relevant to designated conservation areas and for proposals relating to listed buildings and other designated national and local heritage assets. We do not consider that it is properly titled. People do not always read introductions; they are often hubristic trash. The title should make crystal clear what the document is, i.e. “Shopfront Design Guide for Historic Buildings and Areas”. The Introduction should make very clear that the guidance is not intended for borough-wide application. Why can you not include paragraph numbers? Is no-one at your Council able to count?

4. You have made only minor changes as a result of our earlier comments. As a result, some of the proposed guidance in this draft SPD continues to exceed what is permitted in law; is impractical and unrealistic; and it totally fails to take account of the actuality of Great Yarmouth’s shopping environment. Much of the advice remains unduly onerous and excessive.

5. In chapter 7 “Design Principles”, page 28, the use of high quality materials is encouraged. But the paragraph then continues to denigrate uPVC, acrylics, plastics and “laminates” as if they are not high-quality materials (why you have removed “Perspex” is not clear – perhaps Perspex is now wholly acceptable – or are you afraid of lawyers?).

The paragraph says that they are “unsympathetic”, but fails to explain how. Plastic materials used in the sign industry today are high quality, recyclable and can be produced in a variety of finishes. They can be wholly sympathetic to modern shopfronts which may also have uPVC window and door framing and other modern design elements.

Some of the signs most commonly seen in historic areas are also necessarily at least part plastic or acrylic. They are suitable materials for the faces of letters and graphics illuminated from within. Your “automatic” rejection of modern materials is typical of the whole backward-looking SPD. This comment also applies to the advice on “Materials” on page 40.

6. Do you know what “laminates” are? They can be any two surfaces bonded together, usually where one protects another. Their use can be wholly appropriate depending on the materials. Remove the objection to laminates.

7. Page 28, fourth paragraph: “contemporary” and “distinct to its time” is a tautology. Delete one or other. Why should you use “traditional” materials in a contemporary design? This also partially contradicts the advice on page 47.

8. Pages 31 and 35. The Council appear to have an obsession with what is inside shop windows. The UK (including Great Yarmouth) is not (yet) a nanny state. What is inside a shop window is absolutely at the discretion of the shop owner. If he wants to put shoes inside the window of a flower shop or dustbins in a lingerie emporium, that is his business and no concern of the Council. This applies also to any posters/stickers applied to the inside of windows. **It is the shopkeeper’s choice.**

Please tell us when it became the responsibility of the local planning authority to advise people not to do what they may perfectly lawfully do. We have explained before that the local planning authority has absolutely no authority to control what someone might put inside their windows (be it shop, house, factory, office or anything which is within the statutory definition of “building”). And the Council cannot get away with saying it is “best practice”. It is not – it is a small group of people within a local authority who think they know better than the people who actually do the business. You can’t control it – get over it and remove all this ridiculous “advice” about how professionals should go about their day-to-day business. Read again our original response regarding this tiresome obsession. The law is against you. To say something is “general guidance”, without qualification, borders on the illegal. “General guidance” could easily be replaced with “planner prejudice”; and would be more true.

9. In Chapter 8, “Fascia”, page 39, do you really think that the advice:

“The fascia should not be confused with the architrave divided in fascias.”

would be understood by anyone (the more so, since architrave is not defined elsewhere in the document)? It is in fact gibberish, clearly written by someone who understands neither classical architecture nor the English language. The following sentence confirms that the whole document is nonsense. It states that the shopfront is a separate element within a building – much of the other advice suggests that the shopfront should be considered as part of the overall building and designed accordingly!

10. The remaining advice on fascias and fascia signs (page 43) is equally poor. “Traditionally”, the fascia often equates to the frieze and is a horizontal band which sits atop the architrave and below the cornice and pediment. It was either plain or decorated, depending upon the overall design. It may have been used for advertising or not. This is the danger of the word “traditionally”. The Parthenon frieze has bas-relief sculptures between metopes. The Pantheon frieze advertises the fact that the building was built by M(arcus) A(grippa). So “traditionally”, the fascia is not used to display “the name of the shop”. We suggest you simply delete all this pseudo-architectural rambling.

11. You have not substantially altered your advice on modern box fascia signs. They are just as much a “fascia” as your example of a tilted board. Tilted boards are now so rare because they are dinosaurs (could not survive a changed environment). Your advice should be up-to-date and relevant. The reality is that internal illumination is the most common form of fascia sign within the town centre (including its conservation areas), particularly on properties with contemporary shopfronts.

The SPD continues to fail 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 older 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 (e.g. 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.

We note that you continue to produce the picture for “short blue” as a good example, without any reference to the dreadful impact of the external illumination which we previously provided. Our picture demonstrated the limitations of “hand-painted” lettering and poor quality external illumination. This is a typical example of where the SPD lacks balance throughout.

12. The advice on “corporate” signage (pages 39 and 40) is far too dogmatic. “Corporate” signs are provided for a reason. People can quickly identify the premises they seek; this is comforting and reassuring. It is only planners who have an issue with this. “Corporate” signs are not “often inappropriate”. They are “often” appropriate. “Are often” should be replaced with “may occasionally”.

13. In Chapter 8 “Colour”, page 37, we accept that some historic shopfronts may need to be coloured sensitively. However, the advice (although we recognize that it has been slightly altered) remains unduly onerous. Yet again, what is “excessive contrast”? Red and yellow? Red and white? Red and blue? Green and yellow? (think McDonald’s, Burger King, Tesco, Morrisons).

Again, colour is a commercial consideration. Local authorities should only concern themselves when the colour is so obtrusive that it affects visual amenity (as required by the Regulations). Otherwise, this is again a matter for personal choice, as indeed it should be. And how will a local authority enforce this? Any deemed consent or excepted advertisement may be displayed regardless of its colour. This would include the vast majority of non-illuminated fascia, hanging and window signs, including those in conservation areas. So the “advice” cannot be enforced.

We therefore suggest again that the “general” advice on colour be entirely deleted. We give a further example – what colour would most people associate with the Parthenon? White marble? Yet, when completed, its decoration was brightly painted in many colours with gold and silver fillets – see the main façade to Athens University in Panepistimiou (Eleutherios Venizelos) which attempts to give an idea (albeit toned-down for modern tastes – early peoples liked bright colours; and so do modern shoppers – genes don’t change quickly).

14. In Chapter 8 “Signage”, page 38, the advice remains totally unrealistic and we repeat our original objections. That fascia signs should use “traditional hand-painting” is unachievable. There are not enough professional sign writers still practising in the UK to supply even Great Yarmouth’s commercial offerings. And the price is prohibitive.

15. Acceptable fascia signage can be in a very wide range of forms and designs.

Individual letters can be fitted even when there is an existing fascia board. Signs can be in a variety of materials to suit the style of the shopfront and/or building. A “traditional hand-painted” fascia board would look wholly out of place above a modern metal or plastic-framed shopfront with large plate-glass windows. Modern, slim, internally illuminated fascias can be wholly acceptable (see above). The advice is pointless and unrealistic. It should either be expanded widely or, probably best, replaced simply with:

“Fascia signs come in all sizes and materials. The advice on “Fascia” above is relevant. The fascia should be in scale with the shopfront and building as a whole, as

should advertising upon it. Design will vary widely. But the important consideration is that the overall appearance of the fascia should complement the character and design of the shopfront as a whole and, where appropriate, the building of which it forms a part.”

16. It should also be borne in mind that local authorities may not concern themselves with the content of a sign unless it affects amenity or public safety in any particular case. The SPD cannot therefore dictate that the content of any sign be only the shop name or, for that matter, anything else. For example, there is nothing to prevent a greengrocer’s fascia sign from saying “pharmacy”. This is a ridiculous example because commercial consideration would never permit it – but the law would! So references to fascias or letters with the shop name only should be deleted.

17. The advice that hanging signs should be at, or below, fascia level has been retained. This remains impractical. Such signs must leave adequate headroom for public safety - a hanging sign below fascia level would often not permit this. And a hanging sign fixed to a fascia can spoil the fascia. It is for this reason that many hanging signs are displayed from brackets set above the fascia. The board may then be seen safely and clearly either at the same height as the fascia or wholly above (as often in the case of public houses).

18. Why should “gloss” paint be avoided? Most people paint the woodwork/metalwork of their homes in gloss paint for a reason. It wears well, does not readily discolour and gives a pleasing finish. Matt paints can appear dull and never weather as well. This advice has no sound basis and is unenforceable; again, the matter should be left to personal choice.

19. We suggest again that the whole “Signage” section should either be deleted or re-written entirely – it remains wholly risible.

20. Chapter 8 “Illumination”, page 43, starts badly and continues in the same vein. “Traditionally”, illumination inside buildings was from candles or dips (much later, town gas) and was extinguished when not needed (for economy and danger of fire). Shopfronts were dark at night. It was only with the comparatively recent advent of the electric light bulb that shop windows were able to be lit safely throughout the night if so desired.

The suggestion that internally or halo illuminated signs “should be avoided” or “is out of place” puts the Council in with the dinosaurs. Such signs are commonplace, including within commercial conservation areas. As above, modern internally illuminated fascia and projecting signs are often wholly acceptable; these also avoid the need for external fittings (such as spotlights or troughs) and associated wiring/switch boxes etc.). There is no reason to advise against the use of such common commercial shopfront advertising. And perhaps the Council could explain what “subtle, high-quality” lighting is and where it might be installed. Surely illumination through letters only, or “halo” illumination is “subtle and high-quality”.

21. Your “case studies” are only designed to emphasise all the misplaced preconceptions in the rest of the SPD. They are pointless. The bibliography fails to include a single study on modern retail trends or the demise of the “traditional” town centre. The SPD only fulfils its role in aiding and abetting the collapse of town centre retail through excessive interference from people who have never been commercially active in the private sector.

22. One final suggestion for the benefit of Great Yarmouth as a whole. We suggest you scrap the whole document; conduct a consultation on what town centre retailers really want from the Council; and provide that.

Yours faithfully

Chris Thomas
for British Sign & Graphics Association