

1 December 2023

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Dear Mr Kelleher

**County Durham Shopfront Supplementary Planning Document (SPD)
First Stage Consultation Draft, October 2023**

Thank you very much indeed for the opportunity to comment on the above draft document.

The City of Durham Trust re-affirms its strong support for the County Council's initiative in producing a range of SPDs to assist with interpretation and application of particular County Durham Plan policies. We share the desire to secure consistent and focussed planning applications and submissions that address the requirements laid down in policies and to remove the difficulties that have been experienced by Members, officers, applicants and consultees in some cases.

Generally, the Trust welcomes the guide and considers that it will be useful document when approved. The Guide concentrates on traditional shopfronts and consequently the historic environment. While this is helpful and supported by the Trust, there is a need to deal with new shopfronts and leisure premises frontages. It will need additional sections to deal with this or to clearly identify its current focus.

The main thrust of the Trust's comments is to reflect its concerns experienced when dealing with planning applications and the extensive experience of members and trustees. Principal areas are:

1. The retention and repair of traditional shopfronts
2. The intrusion of contemporary (i.e. modern) additions or changes, particularly signage, lighting and for leisure uses.
3. New leisure and shop frontages.

Pages 3-8 – this is a generally useful introduction but needs, as the comment above, to clarify what the scope of the guide is – traditional only or traditional and modern.

Pages 9-10 – The Trust would like to draw attention to the former Durham County Council, Environment Department publication '*Shopfronts - Design Guidelines in County Durham.*' The

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date is unknown but the guide to traditional shopfront elements remains useful and is richer in its content than the SPD draft. It merges advice and description but it is a useful source.

Page 10 also has some paragraph issues - the right hand side first paragraph belongs below the first two paragraphs on the left-hand side.

Page 11 Corporate Image – the desire to see new investment by corporate businesses has, on occasion, taken precedence over the need to respect the historic environment. This section is very welcome. Signage size, lighting and building colours have all been problematic: branding design can be adapted but is seldom welcomed as a suggestion. Other authorities achieve this and this section is a useful step towards improvement. The section strays into modern design and more clarity and expansion of this is needed: traditional and modern have quite distinct design requirements.

Page 11 Use of Colour, Canopies and Blinds– the Trust supports these sections.

Page 12 Security – The Trust suggest strengthening this section and the removal of the qualification in the second sentence, thus - *‘Generally external shutters should be avoided in favour of an internal shutter or lattice inside the glazing.’*

Pages 12-13 Signage and Lighting – As noted, the Trust sees this as a particular concern. An addition suggested is to deal with the overlarge size of lettering – this is a frequent problem and guidance is needed. Shutting off external lighting after business hours would be a useful recommendation. Often lighting is simply left on in the belief that it is useful advertising but is more of an environmental nuisance of little practical value. In relation to light levels it would be valuable to reference the Institute of Lighting Professionals current guidelines for advertising (*Professional Lighting Guide 05/22, PLG05 The Brightness of Illuminated Advertisements*). If modern frontages are to be included in these guidelines this is a specific issue that requires clear advice.

Page 13 Internal Lighting/Window Displays – The high levels of illumination of digital screens sited inside the frontage windows needs a reference. These are very intrusive in a historic setting with limited light levels.

Page 13 Pavement Signs/A Boards – The Trust supports this section but it needs to also deal with the prevalence of low-cost poorly-designed external areas for leisure premises. While originating during COVID lockdowns these are now becoming more permanent. Their design is often at odds with the main building. The extents of outside seating areas and their delineation may stretch the definition of ‘shopfronts’ but guidance is needed. The outer delineation can be very effectively set by using planters or flexible barriers.

Pages 14-15 - The content is useful.

Page 15 Maintenance – the photo example should be replaced – the colour blocking and sign size is not appropriate and runs counter to the guidelines in other sections.

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Generally – Examples are needed to show good and bad design – this may cause issues with building owners and tenants and care would be need in how these are shown. Commissioning drawings would be a solution, they were used very effectively in the earlier DCC shopfronts guidance.

Conclusion

The Trust looks forward to the final Code with hope that the above comments will be reflected in achieving the welcome purpose of this Supplementary Planning Document.

Yours sincerely

John Lowe,

Chair, City of Durham Trust