



Brighton & Hove

SUPPLEMENTARY PLANNING DOCUMENT (SPD) SHOP FRONT DESIGN

STATEMENT OF REPRESENTATIONS

This Statement has been prepared by Brighton & Hove City Council under regulation 18(4) of the Town and Country Planning (Local Development) (England) Regulations 2004.

Consultation period and methods

The formal six week consultation period for the Supplementary Planning Document (SPD) on Shop Front Design ran from 10th June 2005 to 21st July 2005. Public notices were placed in the Argus on 9th June and the Brighton and Hove Leader on 10th June. The SPD, the Sustainability Appraisal, the Statement of SPD Matters and the Consultation Statement were made available for inspection throughout this period in the council's city direct offices in Bartholomew Square, Brighton and Hove Town Hall, in Brighton Jubilee Library and Hove Library and on the council's website.

Copies of the SPD documents were sent to the following specific and general bodies or groups:

Rottingdean Parish Council
English Heritage
Sussex Police Community Safety Branch
Conservation Areas Advisory Group
Disabled Access Advisory Group
Brighton Society
Regency Society
Kingscliffe Society
North Laine Community Association
Stanmer Preservation Society
Hove Civic Society
Brighton & Hove Archaeological Society
West Hill Community Association
Rottingdean Preservation Society
Regency Square Area Society
Brunswick & Adelaide Residents Association
The Round Hill Society
Ovingdean Preservation Society
Preston & Old Patcham Society
The Kemp Town Conservation Society
Montpelier & Clifton Hill Society

Brighton City Centre Business Forum
Preston Street Traders Association
St James's Business Association
St Peter's Church Traders Association
North Laine Traders Association
Kemp Town Village Business Association
The Lanes Traders Association
Hove Business Association
Rottingdean Trade, Business & Professional As
Brighton & Hove Chamber of Commerce
Brighton & Hove Seafront Traders Association
Federation of Small Businesses
London Road Traders Association
RIBA Sussex Branch
Brighton & Hove Archaeological Society
St James's Action Group

Representations received

Representations were received from the following bodies, groups or individuals:

English Heritage
Rottingdean Parish Council
Sussex Police Community Safety
Conservation Areas Advisory Group
Brighton Society
Regency Society
Rottingdean Preservation Society
Preston and Old Patcham Society
St James's Business Association
Mr J. Smith

Summary of the main issues raised in these representations

The main issues raised were as follows:

- There should be reference to the economic importance of shop fronts and their contribution to the public realm at the beginning of the SPD.
- There is not enough emphasis or advice on encouraging good contemporary shop fronts.
- The choice of materials and their detailing is particularly important in achieving high quality contemporary shop fronts.
- The sensitive restoration of existing historic shop fronts is welcomed but poorly detailed 'pastiche' designs which fail to re-create original details are not appropriate and should be discouraged.
- The appropriateness of the drawings. They were generally welcomed as clear and helpful but in one case the joinery details were criticised as being too heavy and one response regretted that there were not further, more detailed joinery drawings.
- The issue of 'reasonable steps' should be made regarding access to listed buildings and conservation areas.

- Difficult to comprehend how an overall shop front design strategy could be applied to areas as diverse as Churchill Square and Rottingdean High Street.
- Concern that the implementation of too many minor details may result in a draconian design policy which will kill the individuality of small shops. Concern over colour schemes being limited.
- What makes the shops in areas like the North Laine so special is the variety of designs and any attempt to restrict this will have a negative impact.
- The SPD would represent well intentioned but dictatorial and bureaucratic control freakery which would have a negative impact in areas such as North Laine.
- The use of roller shutters should generally be resisted as they sterilise the appearance of areas.
- It is the diversity and the small individual shops of Brighton & Hove that make it so special but parking charges are putting small retailers under severe pressure.

How these main issues have been addressed in the SPD

The Introduction to the SPD has been amended to strengthen the reference to the importance of shop fronts to the local economy and the public realm.

The wording in respect of contemporary shop fronts in conservation areas has been made more positive and the importance of materials to good contemporary shop fronts has been included. It has been stressed that 'pastiche' designs based upon, but not accurately re-creating, original designs will be rejected. Instead, it is made clear that joinery detailing should carefully match patterns and profiles traditional to that historic area.

The shop front section drawing on page 9 has been amended to make the joinery detailing simpler. In addition, a note has been added in the main Introduction to make clear that the drawings are for illustrative purposes only, to help explain the text, and should not be used as exemplars for planning application purposes. A cross reference has been added, in a Further Information section, to the availability of the Shop Front Pattern Book where more detailed joinery sections can be found.

A reference to reasonable adjustments to access to historic shops in listed buildings and conservation areas has been added to the section 7 on Access.

It is considered that the text already makes clear that the particular character of each area should be taken into account when designing new shop fronts and that this will ensure that distinct areas such as Rottingdean or North Laine continue to retain their individuality and/or diversity. However, additional wording has been added to the introductory paragraph to section 5 in order to reinforce this point.

With regard to the individuality of small shops, this is something which the SPD already seeks to protect and it is often the small details that account for such individuality. There is considered to be no conflict between this aim and the wording of the SPD. It will be a matter for implementation of the SPD policy to ensure that high quality individual designs are identified and welcomed.

On the matter of colour, the draft SPD already makes clear that the council will normally only seek to limit colour schemes where the shop front is an original example in a listed building. However, the wording of the paragraph on Colour and Finishes in section 5 has

been slightly amended to make clearer that the advice on appropriate traditional colour schemes is intended to be for information purposes only.

It is considered that the SPD already makes clear that roller shutters will be generally unacceptable, except in very specific circumstances. The Police community safety branch support the SPD.

The Sustainability Appraisal concluded that the option of producing an SPD is the preferred option in order to meet sustainability objectives.

The issue of parking controls and charges is not within the remit of an SPD.

**Jenny Rowlands
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Hove**