



South Somerset District Council

Thursday 17th March 2022

6.30 pm

**Council Chamber
Council Offices
Brympton Way
Yeovil, BA20 2HT**

(disabled access and a hearing loop are available at this meeting venue)



All members of Council are requested to attend this meeting

If you would like any further information on the items to be discussed, please contact the Democratic Services Specialist on 01935 462148 or democracy@southsomerset.gov.uk

Any members of the public wishing to address the meeting at Public Question Time are asked to email democracy@southsomerset.gov.uk by 9.00am on Wednesday 16 March 2022 so we can ensure safe social distancing at the meeting.

If you would like to view the meeting on-line without participating, please see: https://www.youtube.com/channel/UCSDst3IHGj9WoGnwJGF_soA

This Agenda was issued on Wednesday 9 March 2022.

Jane Portman, *Chief Executive Officer*

This information is also available on our website
www.southsomerset.gov.uk and via the Modern.Gov app



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Vice-chairman: Wes Read

Jason Baker
Robin Bastable
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Ray Buckler
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Information for the Public

The meetings of the full Council, comprising all 60 members of South Somerset District Council, are held at least 6 times a year. The full Council approves the Council's budget and the major policies which comprise the Council's policy framework. Other decisions which the full Council has to take include appointing the Leader of the Council, members of the District Executive, other Council Committees and approving the Council's Constitution (which details how the Council works including the scheme allocating decisions and Council functions to committees and officers).

Meetings of the Council are scheduled to be held monthly at 6.30 p.m. on the third Thursday of the month in the Council Offices, Brympton Way although some dates are only reserve dates and may not be needed.

The agenda, minutes and the timetable for council meetings are published on the Council's website – www.southsomerset.gov.uk/councillors-and-democracy/meetings-and-decisions

Agendas and minutes can also be viewed via the modern.gov app (free) available for iPads and Android devices. Search for 'modern.gov' in the app store for your device and select 'South Somerset' from the list of publishers and then select the committees of interest. A wi-fi signal will be required for a very short time to download an agenda but once downloaded, documents will be viewable offline.

Public participation at meetings (held in person and via Zoom) and Public question time

We recognise that these are challenging times but we still value the public's contribution to our meetings. If you would like to participate and contribute in the meeting, we would encourage you to please join on-line through Zoom at: <https://zoom.us/join>
You will need an internet connection to do this.

Please email democracy@southsomerset.gov.uk for the details to join the meeting.
If you would like to view the meeting on-line without participating, please see:
https://www.youtube.com/channel/UCSDst3IHGj9WoGnwJGF_soA

The period allowed for participation in Public Question Time shall not exceed 15 minutes except with the consent of the Chairman and members of the Committee. Each individual speaker shall be restricted to a total of three minutes.

If you would like to attend the meeting in person and speak at Public Question Time, please email democracy@southsomerset.gov.uk by 9.00am on Wednesday 16 March 2022. We need to know how many public are attending to ensure safe social distancing at the meeting. When you have registered, the Chairman will invite you to speak at the appropriate time during the meeting.

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South Somerset District Council

Thursday 17 March 2022

Agenda

1. Apologies for Absence

2. Minutes

To approve and sign the minutes of the previous meeting held on Monday, 28 February 2022.

3. Declarations of Interest

In accordance with the Council's current Code of Conduct (as amended 26 February 2015), which includes all the provisions relating to Disclosable Pecuniary Interests (DPI), personal and prejudicial interests, Members are asked to declare any DPI and also any personal interests (and whether or not such personal interests are also "prejudicial") in relation to any matter on the Agenda for this meeting.

Members are reminded that they need to declare the fact that they are also a member of a County, Town or Parish Council as a Personal Interest. Where you are also a member of Somerset County Council and/or a Town or Parish Council within South Somerset you must declare a prejudicial interest in any business on the agenda where there is a financial benefit or gain or advantage to Somerset County Council and/or a Town or Parish Council which would be at the cost or to the financial disadvantage of South Somerset District Council.

4. Public Question Time

5. Chairman's Announcements

Items for Discussion

6. Chairman's Engagements (Page 5)

7. Presentation of SSDC's Environmental Achievements (Page 6)

8. Chard Shop Front Design Guide (Pages 7 - 76)

9. Review of SSDC Commercial Strategy (Pages 77 - 96)

10. Proposed Update to the Audit Committee Terms of Reference (Pages 97 - 102)

11. Report of Executive Decisions (Pages 103 - 104)

12. Motion 1 (Pages 105 - 107)

13. Motion 2 (Pages 108 - 109)

14. Questions Under Procedure Rule 10 (Page 110)

15. Date of Next Meeting (Page 111)



Chairman's Engagements

On Wednesday 16 March the Chairman will be attending the Mayor of Yeovil's Civic Evening at the Octagon Theatre to see the Yeovil Amateur Operatic Society's production of Kinky Boots.

On Sunday 20 March the Chairman will be attending the Legal Service at Wells Cathedral at the invitation of the Lord Lieutenant of Somerset.

Presentation of SSDC's Environmental Achievements

| | |
|-----------------------------|---|
| Executive Portfolio Holder: | Councillor Sarah Dyke, Environment |
| SLT Lead: | Kirsty Larkins, Director, Service Delivery |
| Service Manager: | Katy Menday, Leisure and Recreation Manager |
| Contact Details: | Katy.menday@southsomerset.gov.uk |

Following an introduction by the Portfolio Holder, there will be a short film on the environmental achievements of the Council since the adoption of its Environment Strategy in October 2019.



Chard Shop Front Design Guide

| | |
|-----------------------------|--|
| Executive Portfolio Holder: | Cllr Jason Baker, Portfolio Holder for Chard Regeneration |
| Ward Member(s) | Cllr Jason Baker (Chard Holyrood), Cllr Tricia O'Brien (Chard Combe) |
| Strategic Director: | Peter Paddon, Acting Director Place & Recovery |
| Service Manager: | Natalie Fortt, Regeneration Programme Manager |
| Lead Officer: | Anna Matthews, Chard High Street Heritage Action Zone Project Manager |
| Contact Details: | anna.matthews@southsomerset.gov.uk or 01935 462958 |

Purpose of the Report

1. To seek formal adoption of the Chard Shop Front Design Guide as a Supplementary Planning Document, supporting policies in the South Somerset Local Plan 2006-2028, in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012.

Public Interest

2. This report is requesting that the new Chard Shop Front Design Guide is formally adopted as a Supplementary Planning Document. The Guide is part of the Chard Regeneration work and High Street Heritage Action Zone. It contributes to the improvement of the town centre environment by giving clear guidelines to businesses and property owners on style and quality of shop fronts.
3. Formal adoption as a Supplementary Planning Document means that the content of the Guide will build on and provide more detailed advice or guidance on policies in the South Somerset Local Plan 2006-2028. It does not form part of the Local Plan nor does it introduce new planning policies. It will, however, be a material consideration in decision-making.

Recommendations

4. That Full Council agree to:
 - a. formally adopt the attached Chard Shop Front Design Guide (Appendix A) as a Supplementary Planning Document, and subsequently to delegate to the HSHAZ Project Manager to make copies of the SPD and adoption statement available to the public for the prescribed period.
 - b. note that the Chief Executive agreed to delegate to the Acting Director/HSHAZ Project Manager the authority to make any factual or typographical corrections to the SPD prior to making the copies available in this way.

Background



5. Chard Regeneration focuses on regenerating the centre of the town, including the new Leisure Centre, and revitalising the high street. Chard Regeneration sets out to boost the economy and make Chard a more attractive, engaging and vibrant place for people to live, work and spend time. The objectives of the programme are:
 - To provide compelling reasons for residents and visitors to visit and use Chard town centre
 - To bring the key sites and buildings in Chard Town Centre back into economic and community use to stimulate physical regeneration and improve the vitality of the town centre
 - To increase the footfall within the town and support existing businesses
 - To improve the leisure and health offer in Chard for both local people and new visitors
 - To reinvigorate and bolster the role of Chard as a Market Town and economic centre.
6. Due to its historic character, SSDC was successful in bidding for Chard to become a High Street Heritage Action Zone (HSHAZ), attracting over £1m from Historic England as part of the £95m government-funded scheme and matched by more than £1m from SSDC. This award supports a programme of investment in the town centre, with a focus on improving public realm, historic buildings on the high street, and shop fronts.
7. This report deals with the Chard Shop Front Design Guide which is a key component of the High Street Heritage Action Zone. Shop fronts and their associated signs and advertisements naturally play a very important part in the appearance of the commercial areas of our towns. Most of the buildings in these areas contain a shop front on the ground floor, which is the principal focus of attention and falls in the direct line of sight for people in the street.
8. The purpose of the new Chard Shop Front Design Guide is to offer advice towards achieving successful shop fronts in Chard, when new or replacement frontages are installed. Chard's High Street Heritage Action Zone provides some grant funding for these sorts of improvements, therefore having effective design guidance in place will support the grant scheme.
9. 'Shop front' is a generic term, short-hand for the assemblage of an entrance, display window, frame and signage. The Guide's principles therefore apply to any property use that utilises this set-up, including retail units but also other commercial or community uses. This is because any such feature is a major contributor to an area's distinctive identity and character.
10. The Chard Shop Front Design Guide, as a draft Supplementary Planning Document (SPD), has been prepared in support of the policies contained in the South Somerset Local Plan 2006-2028 and the National Planning Policy Framework, in particular the Local Plan Policies *EQ2: General Development* and *EQ3: Historic Environment*. Achieving well-designed places is a key component of the NPPF (2021) to ensure better places in which to live and work. Design guides or codes which reflect local character



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and design preferences provide a local framework for creating beautiful and distinctive places with a consistent and high quality standard of design¹.

Consultation Statement

11. The council has an adopted Statement of Community Involvement (SCI) which creates a clear framework for consultation relating to Local Plan documents. In accordance with the process for creating an SPD, the Chard Shop Front Design Guide has been subject to appropriate consultation.
12. An initial public consultation was carried out to understand what features of shop front design are important. Consultees were asked for their views on what makes a shop front attractive/what makes them choose to visit. This was carried out through three in-person events held at Chard Guildhall during October 2021 and an online survey on the Council's consultation portal (Citizen Space).
13. At the same time, statutory Local Plan consultees for Area West were notified by letter of the development of the new Chard Shop Front Design Guide and were invited to participate in this early-stage consultation.
14. The results of these early-stage consultation activities informed the development of the draft Chard Shop Front Design Guide. This is set out in Appendix B – Part 1.
15. The draft Chard Shop Front Design Guide was then presented to District Executive, where it was approved for formal consultation.
16. The formal consultation required by legislation² was carried out for 6 weeks – from Friday 10th December 2021 until Friday 21st January 2022 – which was 2 weeks longer than the required 4-week consultation period for SPDs, to account for the Christmas period.
17. Hard copies of the draft Guide and consultation statement were made available to view in person at Chard Guildhall (Chard Town Council) and at SSDC's Petter's House. Forms to collect in-person responses were provided. An email address was also provided for any responses.
18. The draft Guide was also available to view online on the Council's consultation portal (Citizen Space) along with a survey to collect responses.
19. All consultees on the Local Plan consultation database were contacted to notify them of the consultation. This included the statutory agencies. Individuals who had taken part in the initial consultation and had asked to be kept informed were also notified, along with those who have registered to be kept informed of the Chard High Street Heritage Action Zone, were notified directly, as were all South Somerset elected members. The consultation was advertised more widely via press releases and social media posts.

¹ National Planning Policy Framework (2021) paragraphs 126, 128

² The Town and Country Planning (Local Planning) (England) Regulations 2012



20. The responses received in the formal consultation are set out in Appendix B – Part 2, along with a summary of the main issues raised and how they have been addressed in the final draft for adoption.

Strategic Environmental Assessment/Habitats Regulation Assessment

21. A screening exercise was carried out to determine whether the Chard Shop Front Design Guide SPD requires a Habitats Regulation Assessment/Strategic Environmental Assessment, and was sent to the statutory environment consultees for their comment. It is included here as Appendix D, for reference. All three consultees responded to confirm that they had no comments and/or that they agreed with our determination that these assessments are not required.

Adoption Statement

22. Once adopted, the Chard Shop Front Design Guide will be made available with an accompanying Adoption Statement. The draft Adoption Statement is provided as Appendix C.

Financial Implications

23. The Chard Shop Front Design Guide provides guidance for the improvement of shop fronts in Chard. Until March 2024, the High Street Heritage Action Zone is providing grant support for shop front improvements (funded by SSDC and Historic England, funding already ring-fenced) and the Guide will therefore assist with the effective implementation of the grant scheme.

Legal Implications (if any) and details of Statutory Powers

24. The SPD has been produced in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 and when adopted will form a material consideration in planning decisions but it is not part of the development plan.
25. The Local Plan forms the development plan for the area of South Somerset. It guides and is the first consideration in determining planning applications for land use and development. Legally, planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise.

Council Plan Implications

26. The delivery of Chard Regeneration and the High Street Heritage Action Zone are amongst the Council's key priorities. This report therefore directly links to and supports these priorities.

Carbon Emissions and Climate Change Implications

27. The Chard Shop Front Design Guide provides guidance aimed at ameliorating the negative impact of new developments. It is anticipated to have positive and beneficial



South Somerset District Council

effects on the built environment of Chard town centre. It offers guidance on the implementation of existing Local Plan policies, to provide further positive effects.

28. A screening report for the environmental implications of the Chard Shop Front Design Guide was prepared and is included as Appendix D for reference. As part of the formal consultation, the statutory environmental consultees were invited to comment on this screening and all were in support of our determination.

Equality and Diversity Implications

| | |
|--|-----|
| <i>An Equality Impact Relevance Check Form has been completed in respect of the Proposal?</i> | Yes |
| <i>The Impact Relevance Check indicated that a full EIA was required?</i> | No |
| <i>If an EIA was not required please attach the Impact Relevance Check Form as an Appendix to this report and provide a brief summary of its findings in the comments box below.</i> | |
| <i>If an EIA was required please attach the completed EIA form as an Appendix to this report and provide a brief summary of the result of your Equality Impact Assessment in the comment box below.</i> | |
| Additional Comments | |
| <p>The Impact Relevance Check Form (see Appendix E) confirmed that an EIA was not required, based on the following justification:</p> <p><i>Consultation was carried out to inform the Guide, both in person and online, to facilitate wide involvement. The new SPD sets out guidance and advice to businesses and property owners who are looking to change or create new shopfronts in Chard. It does not require change to existing infrastructure nor does it introduce new policy. It will be considered in planning decisions and should have a positive impact on citizens e.g. guidance includes improving signage & access into shops.</i></p> | |

Privacy Impact Assessment

29. Prior to the consultation, a Data Protection Impact Assessment (DPIA) was carried out which considered in detail the information to be collected. The DPIA is available on request.
30. Information collected during the consultation has been processed in accordance with the legislation. As such, personal details have been redacted from the schedule of representations made during the consultation (Appendix B).
31. No personal data is included in the Chard Shop Front Design Guide SPD.

Background Papers

- Appendix A – Chard Shop Front Design Guide
- Appendix B – Consultation Report
- Appendix C – Draft Adoption Statement
- Appendix D – Environmental Screening
- Appendix E – Equality Impact Relevance Check Form.



Chard

Appendix A

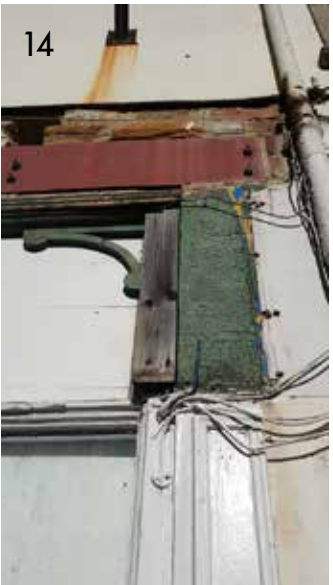
Shop Front Design Guide

Supplementary Planning Document

February 2022



CHARD SHOP FRONT DESIGN GUIDE



Features of Chard Town Centre

1. Traditional shop front setting in use
2. Detail of doorway on Chard High St. fanlight detail above
3. Nameplate indicative of blind designer, mid 20th century
4. Detail of cornice above pilasters on entrance, masked by extended shop fronts
5. Palette of materials within Chard
6. Timber detailing of mid-late 19th century
7. Chard Guildhall
8. Detail combining colours and signage
9. Recessed entrance to shop: terrazzo detailing on threshold
10. Detail of designer of terrazzo threshold
11. Door handles indicative of mid 20th century
12. Bronze frames fashionable in 1940s and 50s
13. Signage, cornice and pilasters combined
14. Detail retained beneath modern sign board
15. Victorian Shop front no. 9 Fore Street
16. Cornice and fascia detail, timber capitol and console of pilaster
17. Carved hamstone corbel and pilaster, material common within Chard

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- 10** • Consoles and Pilasters
- 11** • Stall risers
- 12** • Windows and Displays
- 13** • Canopies and Blinds
- 14** • Signage
- 16** • Access and Doorways
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Preface

This design guidance has been prepared in support of the policies contained within the South Somerset Local Plan 2006 - 2028 and the National Planning Policy Framework.

Policies from the Local Plan to be considered:

- EQ2: General Development
- EQ3: Historic Environment

Having been subject to consultation, this document is a Supplementary Planning Document (SPD) as described in the glossary of the National Planning Policy Framework (NPPF) as

“Documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.”

The NPPF is clear that design guides and design codes should be set in development plans or at least as SPDs.

Whilst the initial principles set out in this booklet apply throughout the district, it is not intended they should be treated as blueprints. This document has been specifically tailored to be used within the locale of Chard Town Centre, concentrating on the evidence of shop fronts remaining and historical records to prepare the principles. It should be noted that *Shop front* is a generic term, short-hand for the assemblage of an entrance, display window, frame and signage. The Guide’s principles therefore apply to any property utilising this set-up, including other commercial or community use as well as retail units. This is because any such feature is a major contributor to an area’s distinctive identity and character.

Good Design Principles are offered as guidance to help towards achieving successful designs for shop fronts and street scapes. Proposals put forward by shop owners for planning and/or Listed Building Consent will be judged on individual merits. An outline of information required for Planning Permission is within Appendix 3 of this document.



- 1. View to the East along Fore Street, early 1900's
- 2. View at Cornhill crossroads, looking East, 1890
- 3. View to the West from the bottom of Fore Street, 1930's
- 4. View to the South along Holyrood Street, 1950s

- Historic England
- Chard Museum
- Community Heritage Access Centre - C.H.A.C
- Contributors to "Chard History Group" Facebook Group.

CHARD SHOP FRONT DESIGN GUIDE

1. INTRODUCTION

The Purpose of the Document

Poorly designed and maintained shop frontages tend to create a run-down appearance of not just the individual buildings, but of whole streets and areas and this can have a negative effect on the visiting public's perception of an area's economic health.

The purpose of this document is to provide guidance for the designs of new shop fronts as well as for alterations, replacement and restoration of existing shop fronts, both in historic and contemporary settings, encouraging a sensitive approach to shop front design.

The guidance notes aim to set out basic principles of good shop front design, to help create a town wide attractive identity for Chard.

Using this Guide

Owners are encouraged to employ a designer to assist them in preparing proposals for alterations. Owners and designers can use this document as a supplement to their own research and to establish the best design approach to suit their business and the building they occupy. There is a wealth of reference material for Chard, held by bodies willing to share archives.

Questions to address when considering initial approaches to the shop front area:

- Is the building listed?
- Is the building in a Conservation Area?
- Are there any surviving historical features to be revealed that ought to be preserved?
- Would a more creative design approach be appropriate or desirable?

Enhancing the street scene can be arrived at with the following.

- Thorough research into the historic context of the building and character of the street,
- Ample consideration of how to complement the building and the street scape with the new design
- Confirming what permissions are required.
- Investigating the existing building fabric, looking for evidence of previous design elements which could be repaired and/or incorporated.



All high street shop frontage should be of a reasonable standard rather than looking run down. ...

A pride should be taken in shop fronts....

Shops fronts should be sympathetic to entire buildings in our high street, Guildhall, Lloyds, Tudor buildings. ...

The town centre is in need of a face lift....The high street needs to be visually appealing to draw in visitors renovating the now many empty units.

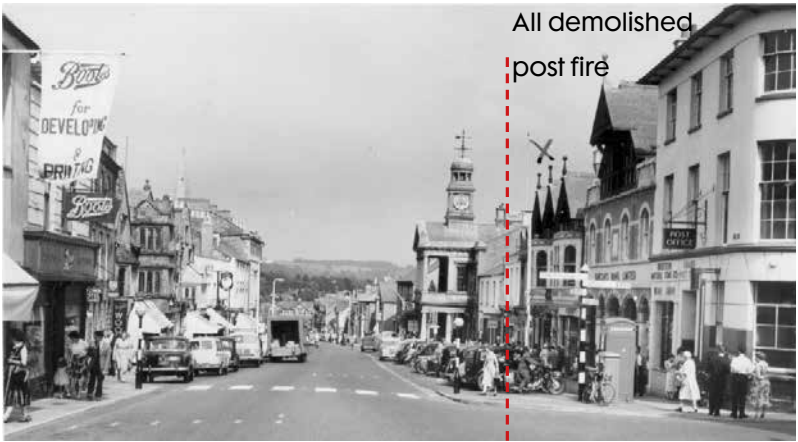
Encouraging artisan trades into the town would be a huge leap forward.

I would like Chard Town Shops to be presented clean, not tired with missing letters and to not appear down at heel. The shops could and should be able to make the most of the history available

.....Some shops are perfectly fine if you know them well, but if trying a new place, something that looks unkempt is discouraging...

A storefront has to be eye catching to draw attention. It should be showing something aspirational, that intrigues you to find out more,..... Window displays should be simple and modern, displaying the products on offer and not overstimulating.....

A selection of comments taken from initial public consultation in Chard October 2021



Purpose of a Shop front

The term 'shop front' is used as a short-hand for the complete assembly of entrance display window(s), frame and signage that we are all familiar with. Frontages are a highly visible part of a town centre's physical fabric, where most of the buildings contain a shop front on the ground floor which is the principal focus of attention in the direct line of sight for people in the street. Their outward appearance plays a key role in our perception of a street or wider area.

Potential within change

Retail is a dynamic activity with premises subject to frequent changes, regular refurbishment to accommodate changes of tenant and in response to the fashion of branding and image.

The pressure of commercial competition results in retailers feeling the need to 'shout' to advertise their presence, often with little consideration given to the wider visual impact. Garish colours, attention seeking oversized or over-illuminated signage, excessive advertising can result in unattractive, uninviting shops and streets, which do not encourage shoppers or other businesses to invest. By their actions, businesses are inadvertently counteracting what they are trying to achieve.

In contrast, the projection of an image of quality and confidence can be achieved by careful design which shows respect for the characteristics of the building and its street scape, making a positive first impression.

Towns with attractive, locally distinctive and well-maintained shopping centres have a better prospect of retaining, or even improving, their economic well-being. The quality of shop fronts has a significant role to play in attracting inward investment to towns and is a major contributor to an area's distinctive identity and character.

Visual Frame

The shop front is an integral part of the frontage of a building fulfilling the following multi purposes

- To advertise the presence of the shop
- To project an image for the business inside, giving a favourable first impression
- Providing an attractive welcome and a framed area for the display of goods and services
- To frame the display, the impact of which is enhanced by its setting within an attractive shop front.
- Providing natural light into the shop.
- Providing a strong visual and physical support for upper storeys contributing to the architectural appearance of the whole building frontage.

Albeit designed to attract attention the effectiveness of a shop front is ultimately dependent upon the quality of its design and the display within its windows. Poor quality, badly proportioned and discordantly designed shop fronts will let down the display and project a poor image for the shop.



1. Boden Street Corner - early 1900's
2. Boden Street Corner - 1990's
3. Boden Street Corner - present day

2.0 SHOP FRONT HISTORY

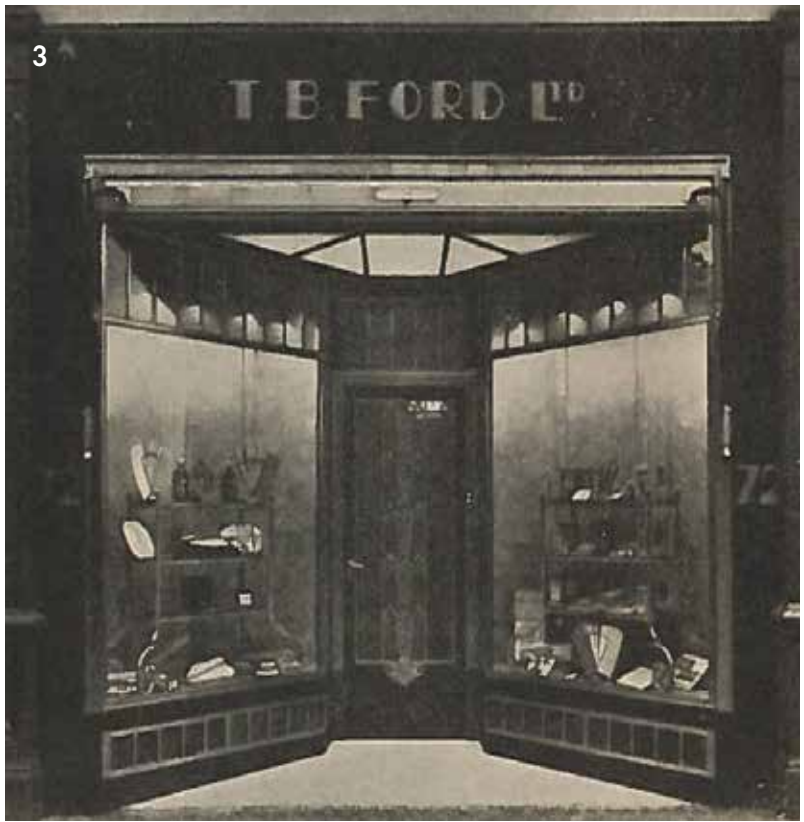
History of Design

The concept of the shop front as we know it today evolved in the 18th century (the Georgian Era) using the classical architectural principles in fashion at the time. This proved to be successful in achieving a satisfactory relationship between the shop front and the building as a whole.

The various classical elements were used in a variety of ways to create a frame for the window displays and to emphasize the entrance to the shop. Since that time the same ideas of proportion and balance based upon classical orders have been used in countless adaptations and continue to inspire designers today. While this may not be the only way to design a shop front, many successful contemporary designs have their origin in the same principles.

Good Design Principles

- Historic principles can be used today: either for the reproduction of a traditional-style shop front in a historic setting or, creatively interpreted as the basis for a contemporary shop front.
- In all circumstances, a design which demonstrates an understanding of appropriate details and the application of the principles of proportion will be more likely to achieve a satisfactory result.
- Remember that a shop front is subject to close inspection by the public and its detailed appearance as a piece of quality construction needs to be designed with as much care as its general proportions.
- Carefully considered details and mouldings do not necessarily add much to the cost but can add considerably to an impression of quality.



1. Early 18th century shop front in London, the projecting window giving the impression of a market stall within the street scape
2. Victorian shop front
3. Art Nouveau interpretation of shop front taken from "Modern Shop front Construction" Trevor Perry 1933
4. Late 20th century contemporary shop front still employing all original intent

CHARD SHOP FRONT DESIGN GUIDE

Historic Principles

The visual frame traditionally consists of a **fascia** providing space for advertising protected from the weather by an overhanging **cornice** above, both acting visually as the horizontal beam which supports the building above.

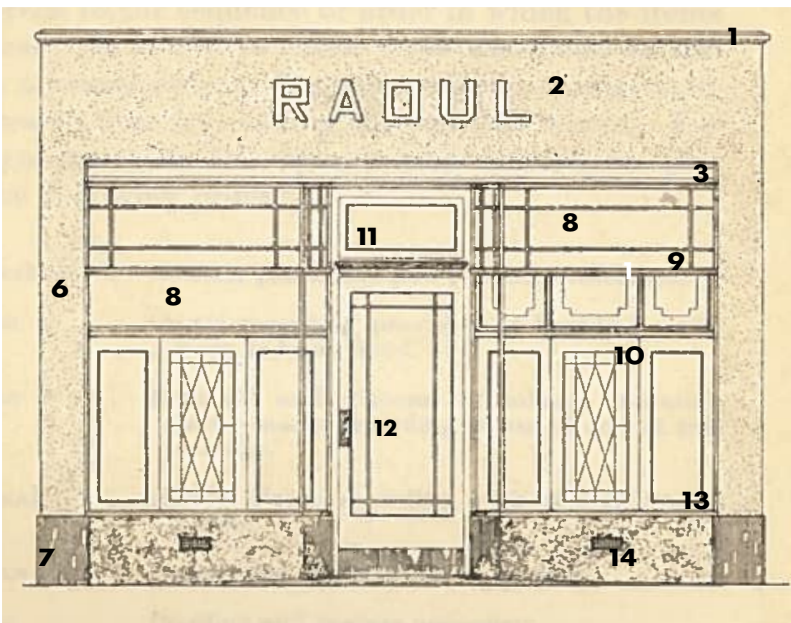
The sides of the frame which suggest support for the fascia and cornice are often finished to represent columns either as true free standing columns or, more commonly, flat-faced **pilasters** whose design is based upon the classical column. Pilasters are used in the design to visually express the structure, to mark the separation of one building and its shop from the next and sometimes to emphasize the shop entrance.

The frame is completed by the **stall riser** which provides physical protection at ground level and gives visual weight to the base of the composition.

Page 19
Left: Late 20th century interpretation of the shop front. Employing original intent, pilasters insinuated with a string detail, incorporating the cornice and fascia in stone within the elevation.



Left: 1930's interpretation of the shop front. Employing original intent, losing the decorative elements of the pilaster, corbel and capitol, but still framing the shop window.



Traditional Victorian shop front Design - principles established based on the classical elements of architecture
Some elements are repeated in both examples, some are specific to just one of the illustrations.

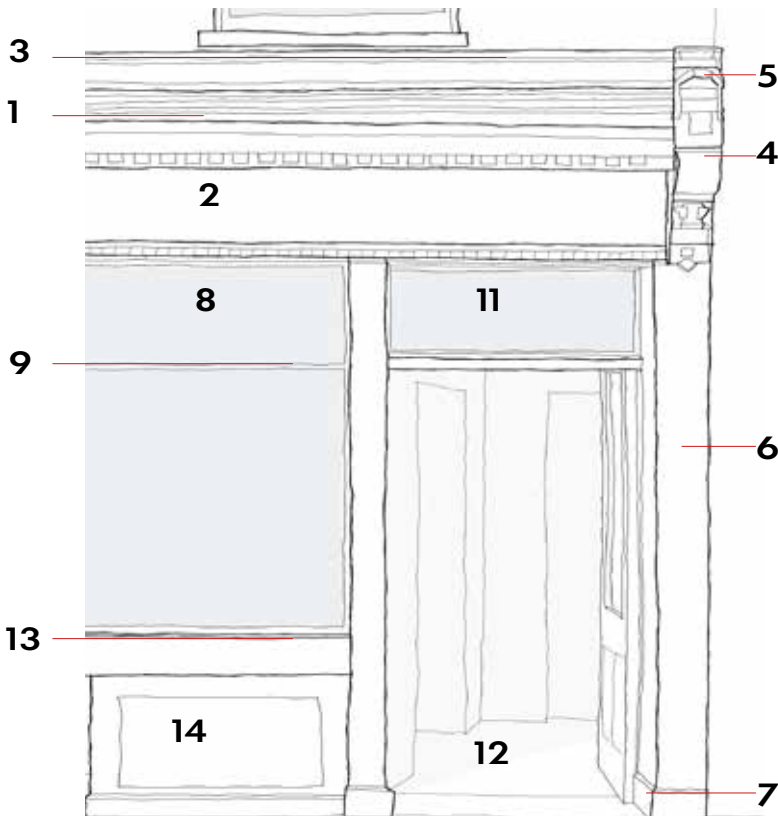


Fig 1

- Employing all elements of the classical order:
- no vertical window bars (mullions)
- blind box sited above cornice between the capitols

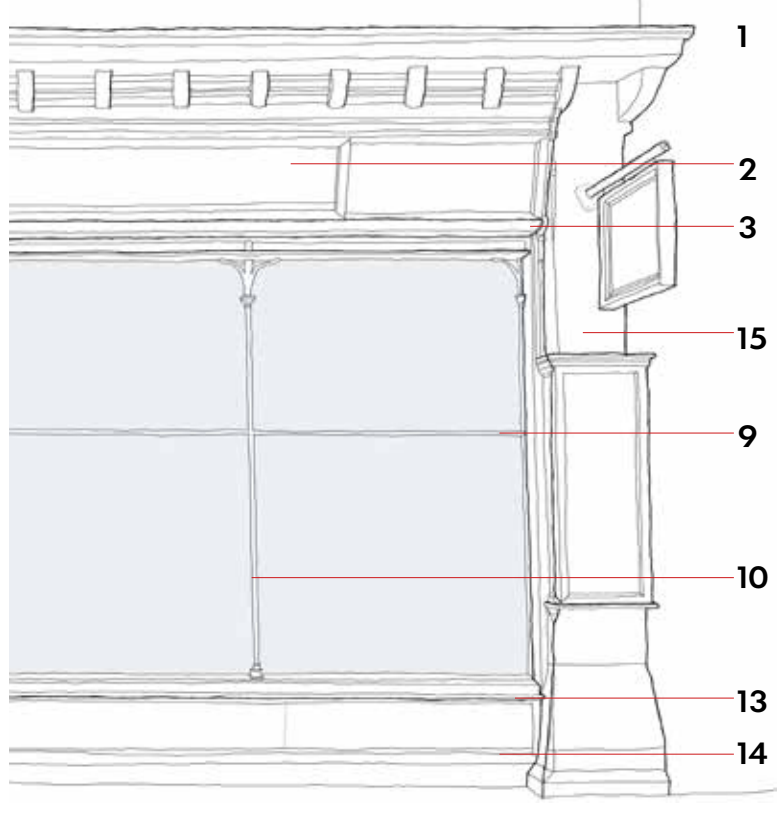


Fig 2

- angled fascia below the cornice
- pilasters rising to meet the fascia without capitols
- frontage of pilasters used for signage
- blind box sited below the fascia

Glossary

1. **Cornice:** An ornamental moulding extending horizontally, demarks head of shop frontage
2. **Fascia:** a flat board, traditionally used to support signage
3. **Blind Box:** traditionally stored blinds within the shop front
4. **Console/Corbel:** a structural piece of stone, wood or metal as a bracket delineating the horizontal extent of the front
5. **Capitol:** crowning member of a column or pilaster, providing a structural support for the cornice.
6. **Pilaster:** an ornamental element with the appearance of a supporting column articulating the extent of the frontage
7. **Plinth:** the lowest part of the base of an architectural column.
8. **Transom Light:** A glazed light above the transom.
9. **Transom:** a transverse horizontal crosspiece separating areas of a window.
10. **Mullion:** a vertical bar between the panes of glass in a window.
11. **Fan Light:** a small semicircular or rectangular window over a door.
12. **Entrance:** an opening, such as a door that allows access to a place.
13. **Cill:** a shelf or slab of stone, wood, or metal at the foot of a window.
14. **Stall riser:** In a traditional shop front, the material installed between the window cill and the ground
15. **Piers:** an upright support for a structure/ sections of structural walls between openings

Outline Building Principles

The Building and its Setting

- The design of a shop front will ideally relate to the architectural design of the building into which it is to fit. It must be designed to unify the whole and not divorce the ground floor from the remainder of the building.
- The complete frontage represents the public face of the building and forms part of the street scene in its wider context. In order to avoid incongruous clashes of scale, form or colour the features of the adjacent buildings must be taken into account

Understanding Shop Front Design

- Whether modern or traditional, a shop front with a poor design can be the consequence of cheap materials, poor workmanship and lack of thought but, more often than not poor design is due to a lack of understanding of the value and importance of the basic design elements that make the shop fronts a cohesive part of the building as a whole and the wider street scape.
- When considering works to a shop front, whether modern or traditional, a good starting point is to understand the history of shop fronts and the general design principles arising.

Existing Shop fronts

- A good quality existing shop front which contributes positively to the character of the building and its setting should be retained whenever possible. This does not only apply to older styles; there are good examples of more recent shop fronts which are a familiar part of the local scene and add to its richness and variety. They may not necessarily be listed buildings. Bear in mind that it is often cheaper to repair an existing shop front than to replace it. Many shops retain interesting earlier features of good quality beneath later additions. These may be capable of reuse to form the basis for the refurbishment of an older shop front.

Purpose built Victorian Town Centre Terrace Building

3 shop fronts set on the ground floor supporting 3 number house units above.

Common Features: Pilasters topped with corbels and capitols, separating three units;. aligned with vertical detail in the fabric above,



Left hand shop

Central shop front

Right hand shop

Original features retained

- Cornice: Recessed angled entrance and door
- Alterations**
- Fascia deepened, signage affixed
 - Stall riser removed, window bars removed, large full height plate glass window.

Considered a Visual Hybrid

- Appearance of modern shop front: lowered window and enlarged fascia affect proportions of the frontage
 - Colour and lettering shows consideration given to design choice.

Original features retained

- Cornice and fascia : Stall riser: Recessed angled entrance: Fan light above door
- Alterations**
- Transom window bar set at mid point.
 - New door, ventilation fan set in light above.

Considered Appropriate

- Respecting original design intent of shop front and building: proportions retained
 - Signage/lettering set in fascia.
- Overall impact of a considered design choice.

Original features retained

- Cornice retained
- Alterations**
- Corbel and capitol detail covered
 - Shop front remodelled. Modern design incorporated with little consideration for the original building style
 - Branded corporate signage
 - or neighbouring shop fronts

Considered Unsuitable Remodelling

- No response in new design to the neighbouring frontages or to the original building
- Oversized fascia in contrasting colours overpowering shop front.

3.0 ELEMENTS OF SHOP FRONT DESIGN

Cornice and Fascias

Of all the parts of a Shop front the fascia probably has the greatest effect upon the street scene, providing a place to advertise the name of the shop.

Fascia designs should suit the character of the building as a whole, the style and proportion relating to the architecture.

Fascias are generally topped by a projecting cornice, which provides a visual stop to the shop front on the elevation. It also serves the practical purpose of providing weather protection for the signage below.

Good Design Principles

- New shop front designs should incorporate a fascia unless a high quality unified design can be shown not to require one.
- New oversized fascias should not be applied on top of existing ones. The resulting appearance is generally undesirable and can eventually lead to the decay of original material behind.
- The fascia must not obstruct other significant elements of the building, i.e keeping the top of the fascia or cornice clear of the first floor window cills.
- Fascia depth dimensions should be proportionate to the size of the shop front and building. Traditional fascias are usually no more than 380mm deep. As a guide; keep the fascia and cornice element of the shop front to less than one quarter of the height of the whole shop front.
- A fascia usually requires a visual “cap” in the form of a projecting cornice. This will also serve to protect the fascia and the shop front from the weather.
- If an internal lowered ceiling needs to be visually obscured, this can be done with other architectural methods, such as an opaque transom light.
- Corporate organisations should adopt their signage to fit the surroundings
- Avoid the use of projecting box fascias, whether internally illuminated or not, particularly in conservation areas and on listed buildings.



Loss of original features with the addition of a large sign.
Oversailing the fascia, pilasters, and window heads.



Removal of face mounted larger boards
Allowing re-instatement of window heads, side pilaster details.
Introducing cornice which offers protection from weathering above the sign



1. Signboard abuts window cill above
2. Oversized fascia sign and large lettering detracts from uniformity of the streetscene. Plastic finishes in garish colours also detract from the quality of the fascia and can make a shop front look cheap.
3. Two fascias applied obscuring the original design, lower panel set over original blind box



lead covered cornice providing protection for signage below.



Individual mounted letters set on fascia working within existing dimensions. Opaque transom light, used for signage.



Original angled fascia used for discrete signage, emphasised with vertical sign

Consoles and Pilasters

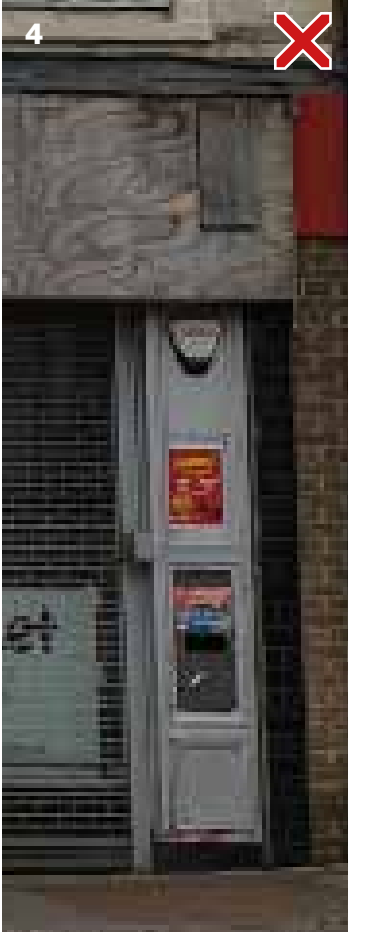
Pilasters are shallow piers or rectangular columns projecting only slightly from the building’s facade wall. They function as a vertical frame to the shop front and accentuate the subdivision of the frontage into separate units. They also provide a visual support to the fascia above.

Traditionally pilasters are made of wood, and tend to be thin and decorated. Much like their predecessors the columns, pilasters have a base, often reflecting the height of the stall riser. The top of the pilasters can be finished with a projecting head: the console bracket. This will usually have the same height as the fascia and in many cases allows the latter to be installed at an angle. Console decorations tend to be elaborate in traditional designs.

Avoid covering them which will damage the character of the original design; reinstatement, uncovering, repairing and renewing is encouraged when any new shop front design is proposed.

Good Design Principles

- Traditional shop fronts should incorporate pilasters, with a base and a capitol.
- It is highly recommended to retain original pilasters and repair them as required.
- Contemporary shop fronts should maintain the principle incorporating a clear division between shop front units, if not including a physical pilaster - using masonry piers between buildings, or piers within the shop front.



1. timber pilaster supporting fascia, with no capitol.
2. stone pilaster, ornate corbel and capitol at head all remains in-situ
3. ornate corbel and capitol retained, inappropriate facing material on pilaster, unsatisfactory detailing between old and new
4. Original capitol overridden with enlarged fascia.

Left : Treatment of original pilasters separating shop fronts varies dependent upon which shop takes responsibility for the architectural element. The detail, if intact, should remain visible and not hidden in favour of bland over boarding matching inappropriate fascias.

Stall Risers

Stall risers are the solid panels beneath the windows, generally incorporated into traditional designs. The architectural function is both to protect the base of the shop front and give it visual weight and strength as it connects to the ground.

A stall riser is also an advantage from the point of view of security in physically strengthening the shop front and reducing the size of the glazed opening.

Stall riser heights vary according to the overall proportions of the building, as well as the nature of the business and how much window display area is needed

Conversely, modern shop fronts have large expanses of plate glass, down to ground level. This approach increases the view into the shop and breaks down the barrier between inside and outside. It results in a dramatic and effective display area however, such minimalist design is generally not appropriate in parades of shops where display areas are more conventionally framed. It works better in internal shopping malls and for well designed modern shop fronts, in contemporary settings, not so suited to a traditional town street scape



Good Design Principles

- Stall risers should be incorporated into designs for new shop fronts in existing historical buildings;
- Stall riser height should generally not exceed the base of the pilasters or approximately 450mm. However, there may be situations where the height could or should be increased, planning advice should be sought accordingly;
- Stall risers should be made of substantial materials and be compatible with the shop front frame and upper building.
- Where a stall riser is being replaced, the chosen material must relate to the building and its context;
- Proposed timber panelled stall risers should have properly detailed panels and not applied surface mouldings to create a panelled appearance as a substitute for proper joinery.
- The stall riser should terminate in a moulded projecting cill and a sub-cill to create a clear horizontal distinction between the window and the base

Suitable finish materials within traditional shop fronts

- timber panelling painted
- ashlar stone
- render
- brick in some situations

Further suitable within contemporary shop fronts :

- polished stone, marbles, granites and other non-local stones
- mosaics, ceramic tiles

The following materials will not be supported and should be avoided

- rubble stone
- acrylic sheet,
- composite or tongued and grooved boards



1. Inappropriate material will decay quickly near ground level, creating undesirable appearance
2. Inappropriate decoration of panelled scheme, applied as a copy of an original stall riser. Colour emphasises the difference in design detail of window frame and planted riser
3. Original panelled risers stand proud of the window frame, with a protecting cill, sitting against internal structure which supports the glazing above.
4. rendered stall riser.



Windows and Displays

A shop windows' primary function is to display the goods sold in the shop. However, they also allow inside activities to be seen from the outside thus enlivening the street scene and promoting natural surveillance. Varying glazing finishes, such as engraving, can add interest to the shop front's appearance and can be utilised as a high quality advertising opportunity or a chance to show off the nature of the business.

The ability to see into a shop, to determine the quality and nature of the goods on sale, is a significant driver in the footfall over the threshold of an independent business, an assertion that was underlined in the initial public consultation for this document.

Historically shop windows are subdivided by mullions and transoms, often in timber. These subdivisions reflect the proportions of the shop and the rest of the building's elevation and are in keeping with the character of the street. Additionally, this subdivision assists in the creation of human scale proportions to the frontage, gives stronger visual appearance and aids security.

Contemporary shop front windows, set within contemporary builds, tend to have large expanses of glass as a principal feature of the Shop front design; this can work well within modern shopping areas, but does lead to a lack of individual identity for towns and cities.

Shop forecourts containing an attractive display can significantly add to the appearance of a shop front and the visual interest and vitality of the street.



Good Design Principles

- Within historic buildings, very large areas of glass are best avoided in favour of subdivided areas. Subdivision introduces the perception of human scale and can be a means of helping the design reflect the rest of the building.
- Subdivision is more successful vertically, making windows taller than wider, reflecting the scale of the building and its overall vertical proportions.
- Transom divisions should be positioned to divide the window at door height. Mullions should line up above and below any transom divisions, appearing to run through the horizontal rail.
- Timber profiles in traditional window rails should reflect historical styles, not being rectangular in section, but moulded. Tapered, lambs-tongue or rounded sections give a more slender appearance and subtle shadow lines;
- Windows should not be used for extensive display of temporary posters. If posters are needed, the display of a few, well positioned and designed will be more effective than filling the windows.
- The display of goods outside a shop front can look attractive if well organised, but take care to avoid displaying too much which could result in a chaotic appearance.
- Do not obstruct the public highway or footway with displays. Pavement displays can normally only be sited on privately owned forecourts. *



1. The shop front design doesn't contribute to the streetscape: no visual connection, no opportunity for lighting after hours
2. Large plate glass, set within original shop front, vertical separation maintained to introduce scale
3. Carved timber mullions framing vertical lights, shadow producing depth to the frame
4. Accessible forecourt display reflecting the general appearance of the internal shop
5. Clutter confusing shop offering and frontage.

CHARD SHOP FRONT DESIGN GUIDE

Canopies and Blinds

Canopies and blinds act to provide shelter for pedestrians and protect the shop display from damage by weather; a lively addition to the street scene if integrated within the shop front.

They should not be introduced as a form of advertising space but always be functional and retractable.

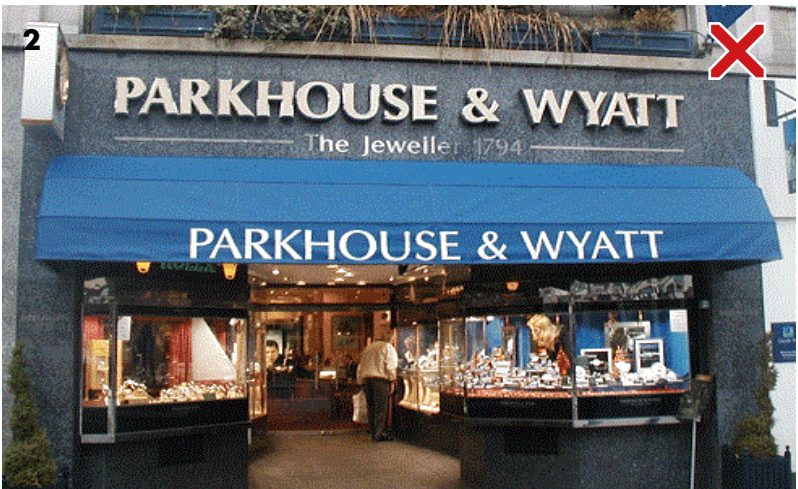
Premises which face north or are situated in very narrow streets should have no need for blinds.

Canopies required to offer shelter to goods displayed on a private forecourt, should be retractable.

Good Design Principles

- Materials for blinds should be non-reflective. Wet-look material, shiny plastics, garish or fluorescent colours are unsuitable as additions to a shop front
- Design the housing for the retractable blind to form an integrated part of the shop front fascia, this way the blind will relate to the form of the shop front.
- Dutch blinds are considered inappropriate on the high street since their form when open and the shape of the housing is unlikely to relate well to an existing shop front
- Proposed blinds should always be retractable when not required. Fixed blinds are generally inappropriate within the scale of the townscape
- If traditional canvas blinds and blind boxes are in place, these should be retained and preserved

Historical precedent for roller blinds being prominent shading/advertising device on Holyrood Street.



1. Modern roller blinds set proud on a shop front; blind box better integrated above/below the cornice, not as independent added 'furniture'.
2. Dutch canopy dominating street scape and shop front
3. Blind box installed above cornice and fascia
4. 20th century metal shop front. Blind box incorporated at head of windows
5. Example of blind advertising the shop front, working in tandem with the building design



Signage

Lettering Techniques

- The identity, however displayed is a key component of a shop front. Lettering needs designing and executing carefully as an integrated part of the whole frontage, on both the elevation and the hanging signs.
- Lettering is better confined to the fascia, used to display the name of the shop only. Too much information on a fascia sign greatly reduces its effectiveness and results in clutter and confusion.
- To have visual impact lettering does not need to be enormous. Over large lettering and signs can easily give a shop a poor image and appear overpowering in the street scene.
- Where a shop has no fascia the application of individual letters to the wall between ground and first floor level may be appropriate. Lettering or fixing signs above the usual shop fascia level will not normally be permitted, except in the case of some hanging signs.
- Where a business is located on an upper floor, lettering is often best applied directly to windows. Signs should be simply designed and not overcrowd the window area. Limit individual letters to approx 100mm in height. Lettering and signs applied to ground floor windows should be avoided.
- Hand painted sign writing on a timber fascia is the traditional method of lettering a shop front, and remains one of the most adaptable and effective. The range of styles is almost unlimited and images of great decorative interest and character can be easily achieved by a competent sign writer. Gold or light coloured letters on a dark background are effective in all lights and particularly suit traditional shop fronts.
- An image of quality can also be created with profiled wooden or cast brass letters. Flat plastic cut-out letters can look cheap and undignified and their plain reflective surfaces are not always appropriate.

Good Design Principles

- The style of lettering should be selected to suit the nature of the building, the content of the wording, the shop itself and its setting.
- Keep lettering in proportion to the length and depth of the fascia. A sufficient margin above and below the actual letters and space on either side are necessary to ensure the visual effectiveness of the sign.
- Take account of the distance at which the sign will be read. There is no point in large lettering if the street is narrow. In practice, 50mm high lettering can easily be read at an adequate distance in the average street. Remember, projecting lettering is hard to read at oblique angles and so may not be effective in narrow streets.
- In conservation areas and on listed buildings painted sign writing will usually be the best solution.

House Style and Corporate Image

- Companies with multiple retail outlets should adopt a flexible approach to the design of their shop fronts and signs.
- Almost all house styles can be adapted to suit a particular situation without serious loss of a familiar identity.



1. Brash branding over sailing the shop fronts - advertising taking priority
2. Lettering applied directly to the original fascia and sized accordingly



Projecting box signs

Not usually be permitted in conservation areas or on listed buildings whether internally illuminated or not.

This type of sign should be limited in size to

900mm projection x 300mm deep

750mm projection x 375mm deep

A size between these dimensions

Hanging signs

In the form of a free-swinging board hanging from a projecting bracket

Ideal sizes for Hanging boards

600mm wide x 860mm high: 2 storey fronts

700mm wide x 990mm high: 3 storey fronts

Illumination and Lighting

- Generally it is preferable to illuminate the display rather than the shop front itself but it is accepted that illumination of signs and fascias will be appropriate in some situations.
- Internally illuminated fascia signs can be visually overpowering in the street scene and project a poor image. They are best used strictly limited to a fascia located as an integral part of the shop front. Careful attention to the edges of these signs is essential.
- Individual letters halo illuminated or internally lit can be bulky, brash and difficult to read from the side. A flat fascia sign is often easier to read and, well designed, can give a better image.



Good Design Principles

- Generally only one hanging sign per building
- High quality design of the sign and the bracket. The shape of the sign will usually have a vertical emphasis: the use of a symbol denoting the trade rather than a board may be considered appropriate.
- The size should relate to the scale of the building, the shop front and its situation, not be too intrusive or too small to be effective.
- Hanging signs are best located hanging above and clear of the fascia and cornice, with the bracket mounted between the first floor and ceiling levels. Positions on or near to party walls are often better than central positions but the nature of the building and its surroundings will be the final determinant.
- All signs projecting over the public footway must have at least 2.2m clearance. Where the footway is narrow, the maximum projection may need to be reduced to avoid an obstruction. Signs which project within 450mm of the edge of the footway will need to provide 5m clearance for vehicles.



Good Design Principles: External Lighting

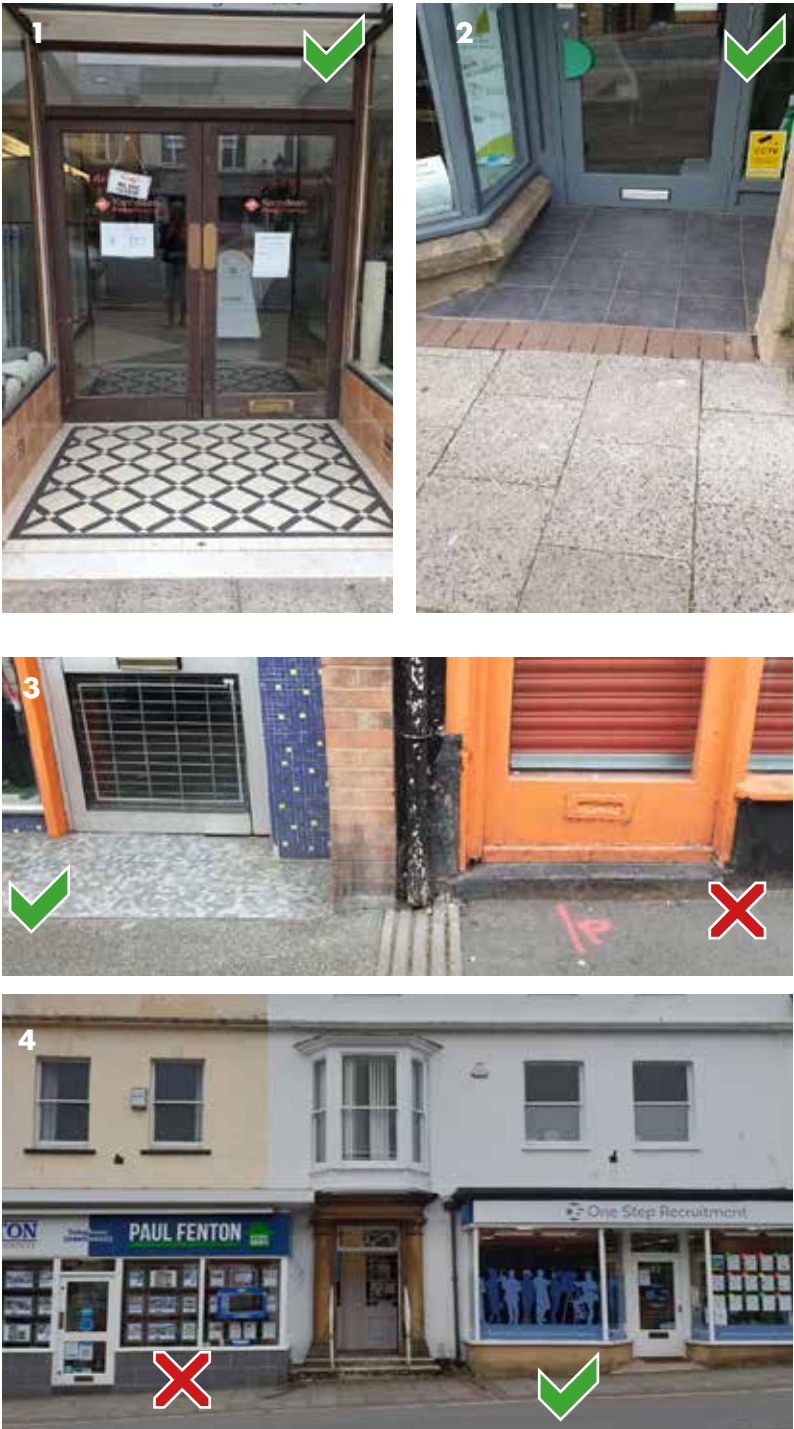
- Lighting must be carefully and unobtrusively designed to respect the building and be appropriate to the area.
- Fascias can be lit effectively with external sources, avoiding the lights themselves becoming prominent features on the face of the building.
- External lights should be arranged with consideration given to passers-by, drivers of vehicles and neighbours.
- Illumination not generally considered acceptable in the following instances
 - Hanging signs
 - Spread across the whole building frontage in an uncontained manner.
 - Internally illuminated fascias in conservation areas or on listed buildings.



1. Corporate illuminated external sign projecting beyond the shop front
2. Corporate signage respecting the elevation with equally effective lighting
3. Well integrated fascia, signage and lighting designed as a whole

Access

New shop fronts should always accommodate the needs of disabled people. Wherever possible steps should be avoided and doors arranged to be both wide enough for and capable of being opened by people in wheelchairs.



Good Design Principles

- Level access: where possible avoiding steps, the shop front entrance should be level and wide enough to allow entry for all users;
- Where a change of level is unavoidable, steps and ramps should be designed in line with Approved Document M of the Building regulations. Small changes in level may be able to be accommodated within the footway outside the shop; the Highway Authority for the area should be consulted in the first instance.
- Doors should be able to be operated easily by wheelchair users and those with limited strength;
- The needs of the partially sighted should be considered when designing a shop front; Incorporating stall risers, glazing bars and suitable manifestation on the shop front will assist in making the facade easier to navigate.
- Forecourt displays and seating can enliven streets and will generally be permitted where it does not cause an obstruction to pedestrians. To prevent conflict, forecourts should be clearly delineated from the main pavement, allowing sufficient space for the free flow of pedestrians. Required clearances are: 3m for primary pedestrian routes, where there is heavy footfall (town centres, busy shopping areas and public transport nodes), and 2m for all other pedestrian routes, where there is less footfall.
- The use of A-boards and similar on-street advertising should be avoided so as not to obstruct movement.
- The interior design and the shop service should also be considered, ensuring the layout is easy to navigate and providing assistance for people with hearing, visual, physical or mental impairments.

1. Accessible entrance, double opening doors for ease of access
2. Alternative floor surface giving clarity of access
3. New level doorway replacing original stepped entrance
4. Entrance with a step on the lower shop front, re-modelled on the higher shop front with an accessible ramp

Doorways

The doorway is an important visual element within the shopfront. Traditionally doorway entrances were recessed, sometimes with splayed sides, providing an inviting lobby area and offering protection from the weather. This also assists in increasing the available window display area and breaks up the scale of the shopfront, adding detail and interest to the street scene. The floor is usually decorated with tiles and mosaics, which sometimes incorporates the name of the original shop owner. The soffit in the lobby area was often panelled, and the glazed panelled doors had ornate ironmongery.

The entrance can be positioned centrally to the shopfront or off to one side. Doors leading into the shops should reflect the design of the shopfront, having a kick plate or solid panel matching the height of the stallriser as well as a fanlight over matching the height of the transom division (if any) of the window display. Two thirds glazed doors are best for the shop entrance and solid timber doors are best for upper floors ' access.

Good Design Principles

- Entrance doors should be designed appropriately to match and be sympathetic to the period and style of the shopfront;
- Removing or changing a recessed doorway into an opening straight onto the pavement will not normally be supported;
- Doorways should be designed to be accessible to all, including those with physical impairments, and people pushing prams etc. New doorways in particular should be wide enough to allow for the passage of wheelchairs and preferably be a single leaf door in line with relevant regulations and standards.

Further guidance on doorways and access is available at: <https://historicengland.org.uk/images-books/publications/easy-access-to-historic-buildings/>

Use of upper floors/Change of Use

The majority of ground floor shops within Chard have alternative uses in the floors above, with independent access doors set adjacent to the main shop entrance. In looking at a shop front, care should be taken in ensuring the independent access looks a-piece with the main frontage.

Conversion of A1 (shops) and A2 (financial and professional) uses to residential is not a permitted development right if the building is within a conservation area, is a listed building or a scheduled monument. This means that for the majority of shops in Chard, a planning application will be required.

A number of shops within Chard have changed from use Class A1 (shops) to Residential, in areas of the town less frequented by shoppers and intermixed with existing residential. Image 4 shows how this can be done in a way that retains original shop front features and therefore does not harm the external appearance of the buildings.

Good Design Principles

- Access arrangements to the upper floors for other commercial uses, considered in any refurbishment or development, should include joint access: for example, a recessed entrance giving access to a unit above and a ground floor use. (fig 2)
- Access arrangements to residential units to take the form of separate arrangements to the front, rear or side of the building as appropriate (fig 1)
- Residential conversions of shops should seek to retain original shop front features where these are of historic interest and/or contribute to the character of the area.
- In maintaining an original shopfront, a new glazed partition can be built internally, creating a small conservatory or lobby behind the original frame. The new partition provides additional acoustic and thermal protection, and can include ventilation grilles or opening window sections.
- The transom glazing can accommodate ventilation grilles, enabling airflow. Alternatively, the transom lights can become top hung opening windows.



1. Shop front and upper floor residential access set in traditional shop front
2. Recessed entrance to shop, allowing access to upper floor set to the side - within one entrance
3. Central access to the original building providing access to the upper floor surgery.
4. Shops on Holyrood street Chard, now used as residential.
5. Ventilation in transom glazing
6. Converted shops in Cullompton

Security

A major aspect of the shop front design is the appearance on the street scape out of opening hours, often governed by the security measures employed.

The ability to have a visual connection from the street to a shop's interior through the window was considered to be a significant aspect of shop front design in the initial public consultation on Shop Front Design (October 2021). This was closely followed by the window display, which, it was felt, should be visually accessible 24 hours a day.

Historically shops suffer from a number of different forms of criminal damage: vandalism (graffiti for example), thefts and burglaries (including ram raids). There is a need for a careful balance between the provision of adequate security and the quality of the town's environment.

The character and appearance of existing shop fronts can be radically altered by the addition of external shutters, box housings, guide tracks, locking devices etc. Such alterations can have a detrimental effect upon the character of a whole street or area. A close-shuttered shopping street will present a drab, lifeless and even hostile atmosphere which, while offering a degree of security to the individual shop premises, is not in the best interests of a town's image or perceptions of safety.

There will always be the need to balance the physical appearance of the built environment against the need to incorporate proportionate crime prevention measures to combat the possible risks a shop front may present. These risks may vary due to the nature of the business, its location, the built environment around it, lighting and level of activity outside of normal business hours.

For more information about security features, please refer to Appendix 2

Further guidance on security for designers is available at the following link: Secured By Design
<https://www.securedbydesign.com>

Good Design Principles

- Security measures should always be appropriate to the likely risk. Before deciding upon any one measure it is advisable to consider the security of the building as a whole.
- Engage with South Somerset District Council for pre application advice before carrying out any work. Planning permission is required for installation, alterations or replacement of shutters or grilles on the exterior of a building, as well as alarm boxes - whilst planning is not required to replace internal shutters, listed building consent will be necessary
- Proposals should take into account the need for security, the likely effect upon the shop front and building, the adjacent buildings and the locality or streetscene.
- Consideration given to visible and illuminated shop window displays, which contribute significantly to the general attractiveness of the street.
- Maintaining internally illuminated displays both in the windows and within the shop will add to light levels in the street after dark acting as an additional measure of security, also enabling police supervision of the interior of the premises. Therefore measures which do not obscure the window display are preferred.
- The system is designed as an integral part of the shop front and does not detract from any architectural features.
- The colour finish matches the shop front.
- Careful consideration to be given to any alterations to glazing which may use etched, smoked or reflective glass. Try to retain old glass within early shop fronts on listed buildings



1. External security grilles set within the window frontage of a Grade II listed building, allowing visual access to shop window combined with successful way of securing a recessed entrance. The shop signage and fascia extends down in front of the blind box, but retains acceptable proportions in relation to the front elevation.
2. A fine mesh external shutter, with sufficient internal lighting allows the interior of the premises to remain visible after dark. By day however the appearance of this type is similar to a solid shutter



Materials for Shop fronts

The selection for materials for a shop front must always take account of the style and design of the proposed front, the building in which it is to be fitted and its setting. Do not use too many different materials in the design.

It is generally preferable to use non-reflective finishes. Wherever possible avoid the use of plastics, mosaics, polished stone, ceramic tiles, smoked or mirror glass.

Timber

- The traditional material for shop fronts. The most versatile and appropriate material for all situations, whether a historic setting, a conservation area, a listed building or for a contemporary design. Infinite choice available in colour and design.
- Should be finished with paint as a general rule. Varnish or stain may occasionally be suitable but not in conservation areas or for listed buildings.
- Avoid tropical hardwoods and all timber from non-sustainable resources.
- Timber can normally be inexpensively altered and easily repainted for a fresh look.

Stone

- Appropriate in all parts of South Somerset but usually only in the form of smooth ashlar. Random or rough rubble finishes are not suited to shop fronts. Take care with the selection of the type of stone. Use stone types local to the area for preference.
- For listed buildings and in conservation areas full details of the stone coursing, bedding, jointing, pointing and mortar mix will be required.

Render

- Only suitable for stall risers or, if executed to the highest possible standard to emulate ashlar stone. Consider using an appropriate selfcoloured mix rather than relying on painting with its long-term maintenance commitment.

Brick

- May look out of place unless the building itself is constructed of brick.
- Each opening in a stone or brick building needs the wall's means of support above to be visibly expressed, whether as a beam or lintel or some form of arch.

Aluminium - suitable for Contemporary fronts

- Not normally considered suitable for listed buildings nor traditional historic frontages.
- Much used for modern shop fronts but avoid the use of self-coloured and anodized aluminium whenever possible. Powder coated finishes have a much better appearance and are available in a wide range of colours.
- Aluminium cladding is not suitable for Chard shop fronts

Steel suitable for Contemporary fronts

- Generally avoid the use of unfinished galvanized steel. Powder coating is available and can provide a good finish in a wide colour range.
- Steel plate cladding is not suitable for Chard shop fronts

Chrome plate, stainless steel and other polished metals

- Usually too hard and shiny in appearance but can be suited to very specific design solutions.

Plastics

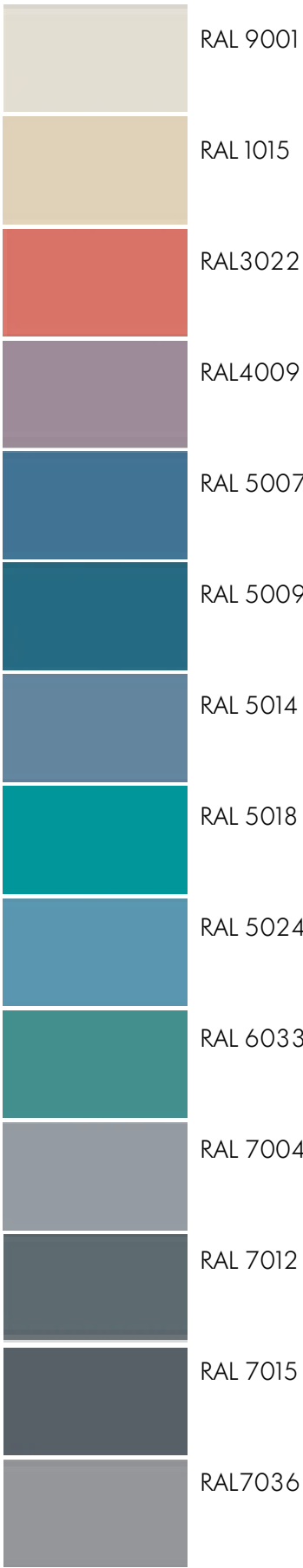
- Much used for modern signs, fascias and lettering. Care is needed in design and selection to avoid a thin, harsh, shiny appearance and with detailing the finish at the edges of sheets.
- Not usually appropriate in conservation areas or for listed buildings.

Flooring

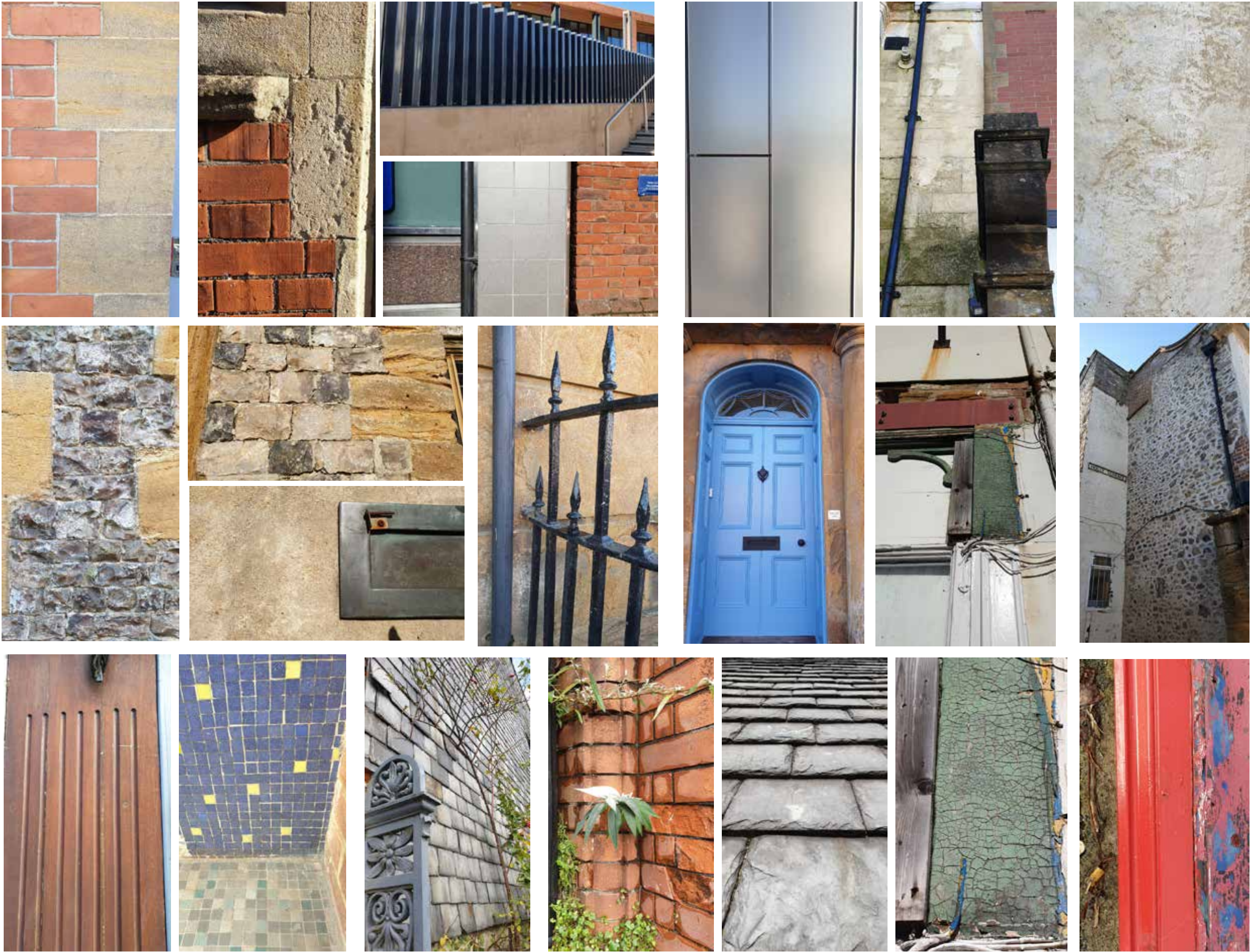
- Consider terrazo, marble, tiles: any material that contrasts with the external pavement

Colour

- Shop front colour should have regard for the colour qualities of the building as a whole and that of neighbouring buildings and their setting, in order to avoid clashing contrasts.
- The local distinctiveness of a place is partly determined by its colours; the colours of the surrounding landscape, the colour of local materials and local traditions of paint colour, all contribute to a local sense of place which can be strengthened by continuity of use. Shop fronts can add to this, perhaps by the use of a locally distinctive colour or variation upon it in some situations. Particularly on a listed building or within a conservation area, some colours may not be appropriate. Corporate colour styles may need to be modified to take this into account. Listed building consent may be needed for repainting a listed building: seek advice.
- Selecting colour requires skill and judgement. This is particularly so for strong colours which may add vitality and interest to a street, or appear too strident and intrusive if chosen without care.
- Dark coloured shop fronts will often help to highlight the display area especially if well lit. Fluorescent colours will be out of place almost everywhere.



Material palette of Chard



4.0 SUMMATION

Checklist

Shop front relationship with building and wider street

- The shop front should reflect and relate in scale, proportion and architectural style to the building in which it is set and to the wider parade of shops;
- The fascia proportions should respect the rest of the shop front and the building in which it is set. It should not be too deep, wide or project forward from the face of the building. It should be positioned consistently with adjoining buildings;

Positive Shop front character

- Where an existing shop front is to be retained and restored or an original shop front to be reinstated, surviving historic features should be preserved and restored in a sensitive manner;
- Where a new shop front is installed, it should draw particular attention to the component parts of good traditional shop fronts;
- Pilasters and consoles, decorated if appropriate, should be used to support the fascia as they form an important part of the overall shop front design;
- Stall risers provide a strong visual base to the shop window and add to security and protection of the window display;
- Entrance doors should be recessed and have a solid lower panel to match stall riser height.

Attractive display windows

- Within the existing buildings of Chard town centre, the shop front window display should be subdivided by vertical and horizontal elements to avoid large expansions of glass and create a well-proportioned frontage. Glazing bars assist in creating visual relief, rhythm and an attractive design;
- Obscured panels filled with advertising should be avoided.

Uncluttered shop signage /advertisements

- Generally signage should be kept to a minimum, avoiding visual clutter, and integrated into the Shop front. It should serve to advertise the goods and services offered whilst respecting the character of the building and street scene;
- Projecting signage should be small, positioned at fascia level or in a discrete position on the building above
- not obscuring details of the shop front or other parts of the building

Preventing light pollution

- External illumination where necessary should be low key and discreetly positioned. It should be designed and sited so as not to cause disturbance to others, including residents and passing traffic;
- Internally illuminated fascia signs should be avoided altogether;
- Proposed lighting levels should be in keeping with the character of the area.

Fixtures, services and entrances integration

- Any canopies installed should be integrated into the Shop front, be retractable and allow sufficient clearance below for pedestrian movement;
- Suitable security measures, such as toughened glass, better internal lighting, internal video cameras and alarm systems are preferable to shutters and grilles;
- Where security shutters are necessary, they should be internally fitted, dark coloured and be of an open design. Guide rails and shutter boxes should be concealed and sensitively integrated into the shop front design;
- Other fixtures, security features, services and secondary entrances should be integrated with and complement the building and shop front;
- Services should generally be located to the rear of a building to remain out of view from the main street or screened from view as appropriate.

Materiality

- High quality and robust materials should be used in shop front construction. They should be in keeping with the character and appearance of the building;
- Where traditional shop fronts are restored, original materials could be replicated.

Equality Act: access for all

- The shop front must allow equal access to all, regardless of abilities;
- Forecourts should be clearly delineated from the main pedestrian routes, allowing sufficient clear space for pedestrian movement.
- Historic shop front alterations should balance the requirement to preserve historic character with the needs of adequate access.

Other considerations

- Material considerations such as conservation design guides should be considered as and where appropriate;
- The repair of traditional shop fronts should be considered as a first option, as opposed to replacement;
- The design of shop fronts in modern buildings can allow for innovation and more flexibility in the design. Nevertheless incorporating basic principles of traditional shop front design should produce successful results that can be an effective advertisement for the quality of the establishment.

For further information please visit:

<https://historicengland.org.uk/images-books/publications/iha-shopping-parades/heag116-shopping-parades-ih/>

OPPORTUNITIES FOR CHARD

Applying design principles

- The shop front should reflect and relate to, in scale, proportion and architectural style, the building in which it is set and to the wider parade of shops.
- The fascia proportions should respect the elevation in which it is set. Avoiding being too deep, wide or projecting forward from the face of the building, positioned consistently with adjoining buildings.
- In retaining, restoring and re-instating an original shop front, surviving historic features should be preserved and restored in a sensitive manner;
- Any canopies installed should be integrated into the shop front, be retractable and allow sufficient clearance below for pedestrian movement;
- Suitable security measures, such as toughened glass, better internal lighting, internal video cameras and alarm systems are preferable to shutters and grilles;
- Where security shutters are necessary, they should be internally fitted, dark coloured and of an open design. Guide rails and shutter boxes should be concealed and sensitively integrated into the shop front design;

Existing Scenario Holyrood Street

- Signage on building elevations above shop front
- New fascia boards planted over line of original box blinds below the original fascia
- Security measures obscuring window heads.
- Extended Dutch blinds obscuring original fascia and window detail
- Altered elevations - doorways blocked
- Loss of original features.
- Contrasting colours in decoration

Opportunities Holyrood Street

- Removal of overboards, re-instatement of original details, referencing historic photographs
- Establishment of horizontal line of fascias respecting the original intent of the building above the shop front
- Fascias used for signage, letters mounted or signwritten.
- Reinstatement of canopies in the form of roller blinds
- Establish original openings within shops.
- System of decoration for individual shops with a single colour scheme providing identity for independent stores
- Vertical sign boards set at a regular height for each frontage



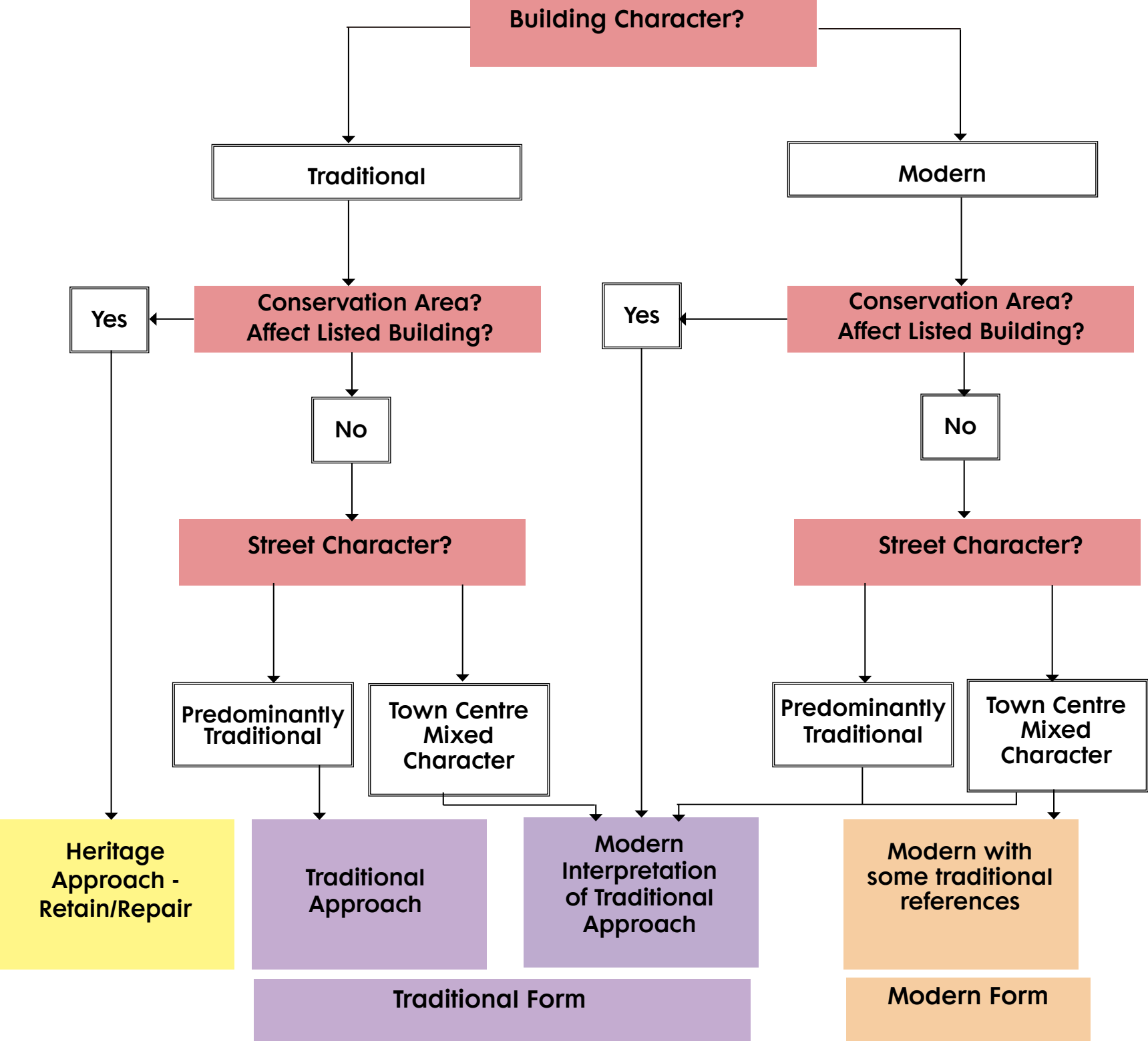
Existing Scenario



Opportunities

APPENDIX 1:
DESIGN APPROACH SUMMARY

Design Approach Assessment Chart



Holyrood Street 1900's



Holyrood Street - modern day



Fore Street Jubilee

It should be noted that in the context of the above 'Modern' refers to the character of any buildings or developments built in the Post-War (1945 onwards) period rather than buildings built in any specific architectural style defined as part of the 'Modern' or 'Modernist' movement.

APPENDIX 2:
SECURITY CONSIDERATIONS

Security Measures for Shop Fronts

Good Design Principles

The following security measures may be appropriate depending upon circumstances. They are listed in order of preference from the point of view of limiting their detrimental appearance on Shop fronts and shopping streets. All the measures are recognised by the Association of British Insurers although the degree of security each provides is different. It is recommend that any products considered have SBD certification

Internal systems

Alarm systems

- Alarm systems can be linked directly to the police, triggered by a contact, infra-red or movement activated device.
- Care should be taken over the siting of alarm boxes. They should be visible but not intrusive and sited to be inaccessible without the use of ladders.
- Suitable locations will depend upon the nature of the individual building but just below eaves level is often the easiest and least prominent site. The boxes may be required to be painted a colour to suit the building or the setting.

Glazing

- Toughened, laminated or anti-bandit glass can be used in place of ordinary float glass. Ensure the frame strength is adequate in relation to the strength of the glass.

Internal lighting

- Secure glazing and alarms, used in conjunction with suitable lighting will allow a level of visibility into the shop for the passing public, as well as illuminating the streetscape.
- If a grille is thought to be required, it should be considered in tandem with the lighting and glazing systems.

A Building in use

- The use of upper floors for residential purposes can give the benefit of the presence of people on the site after hours and will help to generate activity within town centres in the evenings and at weekends which can help to reduce vandalism and crime.

Shutters/Grilles –

A street full of shops with external solid shutters may provide a high level of security to the front of the premises, but can create the feeling of dead space. This in turn discourages passers by, reducing natural surveillance opportunities.

This type of fitting, while probably the most secure, is the most visually intrusive and unattractive when in a closed position and will be most likely to result in an unwelcoming out of hours appearance.

Approval will not normally be granted for this type of fitting unless very special circumstances prevail. Any planning permission granted is likely to be temporary.

Where shutters are considered necessary, there are options considered preferable to **solid** external shutters.

Internal Grilles

- Internal portcullis grilles of open mesh will maintain the effectiveness of the window display and permit visual security. Careful attention must be paid to the arrangement of guide tracks and housing especially in the case of listed buildings. The housing may possibly be fitted either above the ceiling lining or below a stall riser to keep it out of sight. Always use the lightest grille appropriate and have it finished to a suitable colour. Dark colours are less prominent.
- Combined with internal lighting, this is an effective way of securing both the shop and providing life to the street scape.

Removable external mesh grilles or wooden shutters

- These are generally secured to fixed channels over the shop front, removing the need for boxed housing. The shutters are removed during trading hours, or, if wooden, folded back when not in use.
- Care must be taken with the design of fixings to ensure they do not damage the architectural character of the shop front nor leave dangerous projections.
- Externally mounted solid timber shutters will be suitable only in a very few traditionally designed shop fronts.

External portcullis rolling grilles of open mesh

- Very careful attention must be paid to the siting of guide tracks, fixing devices and above all the box housing and motor control gear in order to satisfactorily integrate them into the design of the shop front as a whole; but, if set within the window line, and taken to above the stall riser, this method can be employed as a successful external shutter.
- The housing will have to be placed behind the fascia and guide tracks fitted within window mullions. The system is unlikely to be appropriate for a listed building unless a shop front replacement is agreed and the device is carefully designed as an integral part of the new front.
- The grille mesh should be rectilinear in form and the grilles should not obscure shop front details such as pilasters and stall risers but be designed to fit between and protect the glass areas.

External translucent rolling shutters

- These follow the form of the rolling grille but with glazed panels introduced to form a complete screen. The window display remains reasonably visible and visual security is maintained.
- Requirements similar to those for external portcullis grilles will apply to the detailing of this system but it is unlikely to be appropriate on listed buildings or in conservation areas and only in special circumstances elsewhere.

Other Measures

- Reinforced stall risers constructed into the base of the shop frontage will reduce the risk of ground level attacks or ram raiding type incidents. In addition, how the stall riser is incorporated into the window is important. Ledges at the top of the stall riser that can then be used as seating, should be discouraged ad hoc, these can become congregating points and may lead to anti-social behaviour and other associated offences
- Recessed doorways should be avoided in new shop fronts if possible

CHARD SHOP FRONT DESIGN GUIDE

EXTERNAL GRILLES

Solid grilles present bland and closed street images after hours: **Not desirable**



A fine mesh external shutter, with sufficient internal lighting allows the interior of the premises to remain visible after dark. By day however the appearance of this type is similar to a solid shutter.

Grille protecting stall riser, allowing visual clarity, preferable to solid full depth grilles, though not desirable



External security grilles set within the window frontage of a Grade II listed building, allowing visual access to shop window combined with successful way of securing a recessed entrance. The shop signage and fascia extends down in front of the blind box, but retains acceptable proportions in relation to the front elevation.



INTERNAL GRILLES

permitting the shop front to be visible
Varying degrees of visibility through to the interior.



Internal grilles set behind glazing, that disallow visual access - **less desirable**



Internal grilles that provide visual connectivity to shop interior:
preferable security option



Internal lighting proves effective, illuminating window displays behind protective mesh grille - allowing illumination of the street scene and adding to the sense of a safer environment after dark: **ideal security option**

APPENDIX 3: PLANNING, POLICY AND CONTEXT

POLICY AND LEGISLATIVE CONTEXT Planning and Advertising Consents

IS PLANNING PERMISSION NECESSARY?

The first reference information for planning is as follows.
The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended)

This legislation sets out that planning permission is required for development likely to significantly change the external appearance of a building - this includes circumstances where:

- the development is within the curtilage of a listed building;
- any alteration would be within a Conservation Area;
- the development would consist of or include the construction or provision of a verandah, balcony or raised platform;
- any part of the development would extend beyond an existing shop front;
- the development would involve the insertion or creation of a new shop front or the alteration or replacement of an existing shop front; or
- the development would involve the installation or replacement of a security grill or shutter on a shop front

The list is not exhaustive and as a general guidance the Council should be contacted for advice prior to commencing any work.

From above- it can be seen that
The installation of a new shop front or the alteration of an existing shop front is development which requires planning permission under the Town and Country Planning Acts.

Considerations are as follows with relevant notes on the following pages..

- Highways
- Conservation Areas
- Security measures
- Use of the building above the shop, residential and office?

Other permissions may also be required:

- Advertisements and signs are controlled by the Control of Advertisements Regulations. Obtain pre application advice from the Planning Authority before proceeding.
- Listed building consent will usually be needed if the building is listed.
- Planning Permission will be needed if the proposal involves demolition or the complete removal of a shop front from an unlisted building within a conservation area

It is always advisable to obtain pre - application advice regarding the consents necessary from South Somerset District Council at an early stage.

<https://www.southsomerset.gov.uk/services/planning/apply-for-planning-permission/>

<https://www.southsomerset.gov.uk/services/planning/pre-application-advice/>

Advertisement consent

The display of advertisements with the associated structure is controlled through Advertisement Consent and separate planning permission is not required in addition to the consent. There are three different categories of advertisement consent which are set out in the Town and Country Planning (Control of Advertisements)(England) Regulation 2007.

Detailed guidance is available in the Government publication 'Outdoor Advertisements and Signs: A Guide of Advertisers'

In general, some illuminated signs, fascia signs and projecting signs on shop fronts or business premises where the top edge of the sign is more than 4.6m above ground level, and most advertisements on gable ends, would require advertisement consent. As regulations on advertisement can be difficult to interpret, with certain criteria and conditions to be met, the Council should be contacted for advice prior to commencing any work.

Further links reference the above are to be found at
<https://www.gov.uk/government/publications/outdoor-advertisements-and-signs-a-guide-for-advertisers>

POLICY AND LEGISLATIVE CONTEXT Conservation areas and listed buildings

Conservation Areas and Listed Buildings

- A conservation area is an area of special architectural or historic interest whose character should be preserved or enhanced. There are over 90 conservation areas in the South Somerset District Area and many contain shops or shopping areas.
- A listed building is a building which is included in the Statutory List of Buildings of Architectural or Historic Interest. Specific consent known as listed building consent is required for any work of alteration or demolition. It is a criminal offence to carry out such works without consent. There are over 5,000 entries in the South Somerset list including many shops and commercial premises.
- The South Somerset District Council internet site can help you establish whether your shop is either listed or is situated in a conservation area - referencing maps such as that illustrated for Chard. Note that the majority of Chard town centre is a conservation area.
- Where a building is listed or located in a conservation area the highest standards of design and construction will be expected and special requirements may apply. The retention and repair of good quality shop fronts even if not original will usually be expected. In some circumstances there may be a case for the replacement of poor quality or badly designed shop fronts with appropriate new installations, provided it can be shown that the result will be an enhancement of the building and its setting
- Please review the Chard Conservation Area Appraisal, available at <https://www.southsomerset.gov.uk/media/2652/chard-conservation-area-appraisal.pdf>

Planning (Listed Buildings and Conservation Areas) Act 1990:

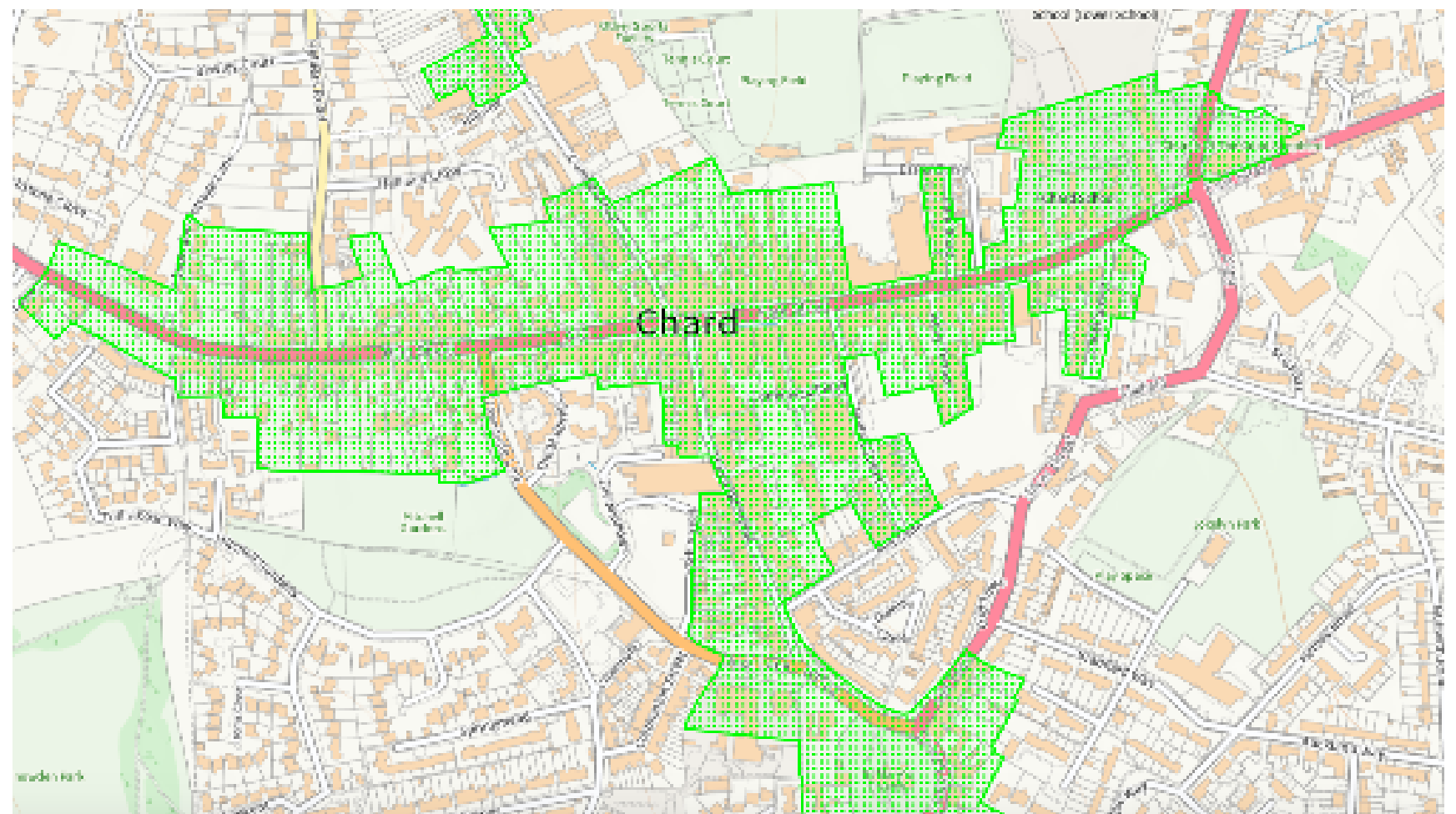
Listed building consent is required for any works to demolish any part of a listed building or to alter or extend it in a way that affects its character as a building of special architectural or historic interest, irrespective of whether planning permission is also required.

For all grades of listed building, unless the list entry indicates otherwise, the listing status covers the entire building, internal and external, and may cover objects fixed to it, and also curtilage buildings or other structures. This includes re-painting a shop front in a different colour, installing blinds or shutters, altering the shop interior, or installing a security alarm or extractor fan.

There is no fee for submitting an application for listed building consent.

Conservation Areas

Areas of special architectural or historic interest and controls are in place to protect buildings within those areas. Planning permission is required for demolition of a building/shop front in a conservation area. Any development should have regard to Section 72(1) which states that “special attention shall be paid to the desirability of preserving or enhancing the character or appearance of [a conservation] area.”



POLICY AND LEGISLATIVE CONTEXT National Policy:

National Planning Policy Framework (NPPF) 2021:

The NPPF places an emphasis on the creation of high quality, beautiful and sustainable buildings and places. This is fundamental to what the planning and development process should achieve, creating better places in which to live and work and helping make development acceptable to communities (paragraph 126). Design guides and codes are expected to provide maximum clarity about design expectations, which reflect local character and design preferences. This helps to provide a framework to create distinctive places with a consistent high quality standard of design that allows a suitable degree of variety (paragraph 128). Such design guides should be produced as part of a plan or as supplementary planning documents, and should be based on effective community engagement and reflect local aspirations for the development of their area, taking into account the guidance contained in the National Design Guide and the National Model Design Code (paragraph 129).

The NPPF also supports development in town centres which reflects their distinctive characters (paragraph 86). In determining applications, local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and the positive contribution that conservation of heritage assets can make to sustainable communities (paragraph 197).

In paragraphs 199 and 200, the NPPF clearly states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). Any harm to, or loss of, the significance of a designated heritage asset (e.g. a listed building or conservation area) should require clear and convincing justification.

National planning practice guidance provides advice on the key points to take into account on design, in terms of planning for well-designed places, making decisions about design, tools for assessment and improving design quality and effective community engagement on design.

National Design Guide 2020 (NDG) and National Model Design Code 2021 (NMDC)

Together these documents illustrate how well-designed places, that are beautiful, healthy, greener, enduring and successful, can be achieved in practice. Amongst the components of design, the NDG states that appearance of a building is the visual expression the building makes, including its external built form, its architecture, materials, decoration, lighting, colour and texture. Additionally, the materials used for a building affects how well it functions and lasts over time. It is recommended that materials should be practical, durable, affordable and attractive to ensure they fit harmoniously with their surroundings. The detailing is equally important and the individual components and how they are put together contribute to the appearance of a building and how it is experienced.

An understanding of context is one of the ten design characteristics. This means an understanding of the context, history and the cultural characteristics of an area. The NDG states that creating a positive sense of place helps to contribute to well-being, inclusion and community cohesion. Well-designed development is demonstrably based on the architecture prevalent in the area including the local vernacular and other factors that relate to identity. The identity of a place comes from the way that buildings, streets and spaces, landscape and infrastructure combine together and how people experience them. Well-designed, sustainable places with a strong identity give their users, occupiers and owners a sense of pride, helping to create and sustain communities and neighbourhoods.

Lifespan is also an important component of design cited in the NDG, as well-designed places sustain their beauty over the longer term and add to the quality of life of their users, while also feeling welcoming to visitors and passers-by.

Further links reference the above are to be found at:
<https://www.gov.uk/guidance/design>

POLICY AND LEGISLATIVE CONTEXT Local Policy

South Somerset Local Plan 2006-2028

South Somerset's Local Plan was adopted in March 2015 and is available on the website: <https://www.southsomerset.gov.uk/your-council/your-council-plan-and-strategies/planning-policy/local-plan/>
This supplementary planning document provides additional detail to, and should be read in conjunction with the following policies:

POLICY EQ2: GENERAL DEVELOPMENT

Development will be designed to achieve a high quality, which promotes South Somerset's local distinctiveness and preserves or enhances the character and appearance of the district.

Development proposals, extensions and alterations to existing buildings, structures and places will be considered against:

- Sustainable construction principles;
- Creation of quality places;
- Conserving and enhancing the landscape character of the area;
- Reinforcing local distinctiveness and respect local context;
- Creating safe environments addressing crime prevention and community safety;
- Having regard to South Somerset District Council's published Development Management advice and guidance; and
- Making efficient use of land whilst having regard to:
- Housing demand and need; i Infrastructure and service availability;
- Accessibility;
- Local area character;
- Site specific considerations

Innovative designs delivering low energy usage and/or wastage will be encouraged. Development must not risk the integrity of internationally, nationally or locally designated wildlife and landscape sites. Development proposals should protect the residential amenity of neighbouring properties and new dwellings should provide acceptable residential amenity space in accordance with Policy HW1.

POLICY EQ3: HISTORIC ENVIRONMENT

Heritage assets will be conserved and where appropriate enhanced for their historic significance and important contribution to local distinctiveness, character and sense of place. Their potential to contribute towards the economy, tourism, education and local identity will be exploited.

All new development proposals relating to the historic environment will be expected to:

- Safeguard or where appropriate enhance the significance, character, setting and local distinctiveness of heritage assets;
- Make a positive contribution to its character through high standards of design which reflect and complement it and through the use of appropriate materials and techniques;
- Ensure alterations, including those for energy efficiency and renewable energy, are balanced alongside the need to retain the integrity of the historic environment and to respect the character and performance of buildings, adopting principles of minimum intervention and reversibility.

As set out in the policies above, the Council will have regard to a range of issues when considering planning applications involving new or replacement shop fronts, including:

- that design should be of a high quality creating quality places
- local distinctiveness should be reinforced and local context respected
- the creation of safe environments
- the historic environment should be safeguarded or where appropriate enhance the significance of heritage assets and their settings
- a positive contribution to the character of heritage assets through high standards of design

Further design advice can be obtained by completing a request for pre application advice.

<https://www.southsomerset.gov.uk/services/planning/apply-for-planning-permission/>

<https://www.southsomerset.gov.uk/services/planning/pre-application-advice/>

This guide has been prepared by South Somerset District Council.

South Somerset District Council The Council Offices, Brympton Way, Yeovil, Somerset, BA20 2HT

Tel: (01935) 462462

Planning@southsomerset.gov.uk

POLICY AND LEGISLATIVE CONTEXT Highways Considerations

Highway Considerations.

- No new part of any frontage, including hanging signs, foundations, awning, canopies, or other structural elements should encroach onto land covered by highway rights. The removal of highway rights in order to construct new frontages will not be acceptable.
- Any new or existing element which oversails the highway must be covered by an appropriate licence under s177 or s178 Highways Act 1980. Such elements must be structurally sound and ensure that the level of height clearance beneath them meets a minimum level. Obviously, height clearance over carriageway would need to be higher than over footway to accommodate the largest lorries to use the routes.
- All doors and windows should open inwards and not out onto highway
- Seating and tables on highway should be covered by an appropriate licence.
- No displays of produce or merchandise including any shelving, tables, rails, racks or similar equipment will be allowed on land covered by highway rights
- No advertising material including free standing signs, 'A' frames or similar elements will be placed on highway
- All illuminated signage should confirm to the Institute of Lighting Engineers current guidance with regard to illumination levels, and all lit infrastructure should be so positioned and shielded so as not to create a dazzle or glare problem for highway users.

APPENDIX 4:
OUTLINE HISTORY OF CHARD

Outline History of Chard - a trading town

Settlement History

Chard is a small town in south Somerset, close to the border with the County of Devon. It lies in a geologically complex area providing greensand, chalk and chert as building materials. Before the borough of Chard was founded in the early 13th century, the settlement, dating back to at least the Saxon period, was probably in the area round the church, known as the Old Town, where roads converge.

In the early 13th century a borough was founded, north of the Old Town. Bishop Jocelyn's charter of 1236 may mark the foundation. This granted burgage lots of an acre per person willing to build for 12d each yearly and **in 1253 a market and fairs were granted**, or the grant formalised. The burgage plots were on either side of the street now called High Street (west) and Fore Street (east) where a shambles, guildhall and market house were developed in the centre of the roadway.

It is not known whether the roadway was created as part of the Borough or was part of the pre-existing road network. Parts of a continuous flint and mortar wall, which may originally have marked the backs of the plots, survive. Aston and Leech wonder whether the town's water supply in open conduits in Fore Street (a rare survival) might date from the creation of the Borough.

Chard was on the main road between Exeter and Salisbury in the late medieval period. By 1690, traffic passed to its south through Axminster, but late 18th century turnpikes brought the main route back through the centre.

By the late medieval period the woollen cloth trade dominated the economy of the manor and Chard was an important local hub. This is made plain in the wording of a request for donations to the town following a town fire in 1577:

‘Whereas in the town of Chard a great and most profitable trade hath of very long time been used in making woollen cloth to the benefit of our whole realm, and especially of all the inhabitants of our county of Somerset, to whom the said town hath been a great aid in employing many a thousand poor people within ten miles compass in working the said trade and whereas by the apt situation of the town **it hath been the convenientest town within the western part for the receipt of people trading from London to the Mount and from Devon and Cornwall and also for the holding of the Assizes**’.

The document goes on to describe ‘the sudden adventure of fire’ on 12 June 1577 resulting in the ‘destruction of the chiefest and greatest part of the building and houses necessary for the said trade and of wool and goods, to a value of more than £9,000’. The good men of Chard had exercised diligence and the expenses of their goods ‘to the uttermost’ but needed help in rebuilding Chard so that the poor could be employed again.’ Town fires were frequent in west country towns where thatch was a common urban roofing material. Even if the cost of the fire damage is exaggerated (which is very likely), the sum suggests a fire of catastrophic proportions.

There are records of Chard having functioned as an Assizes town on the Western Circuit in the 13th century and the 16th and 17th centuries. It seems to have been less important than some of the other Assizes towns and may have been visited only once a year, rather than twice a year. However, even if held only annually, the Assizes made a major contribution to the status and urban culture of any town, bringing to it not only the judges and lawyers who dealt with cases too serious to be heard by local magistrates, but attracting the gentry into town and encouraging, for a few days, social interaction unknown in rural areas.

Gerard's Survey of Somerset refers to the impact that hosting the Assizes had on Chard: ‘it lying soe just in the judges way, by means whereof they have much amended their buildings’. In his History and Antiquities of the County of Somerset, John Collinson states that ‘a public edifice stands near the middle of the principal street, which served formerly for an assize-hall; and now occasionally for a market house’.

The market house, sited in front of the inn now called the Phoenix, was the last of the buildings to survive between the burgage plots on the north and south sides of Fore Street. It was demolished in 1834 because it posed an obstruction to traffic.



Fore Street 1950's - looking east



Fore Street 2021 - looking east - north side
largely unchanged bar the removal of the church and introduction of modern build below Lloyds bank

CHARD SHOP FRONT DESIGN GUIDE

The growth of chard from a market town in the 1700's onwards can be examined through looking at the maps produced of the area, which show the development of the town from buildings set around St. Mary's Church towards the important crossroads at the meeting of Holyrood Street, Fore Street, High Street and Combe Street.

Previously called Cornhill Crossroad, this was the main meeting of the roads, that established the trading of Chard. Its importance is no longer legible within the road layout nor the way in which the public travel through the town due to

- the bollarded 'no entrance' from High Street/Fore Street into Combe Street.
- The width of Holyrood Street, as a one way street and
- the introduction of new, major roads leading from Combe St. Nicholas/Wadeford, entering Fore Street much further west and the A358 taking the traffic that would have travelled to the south from the High Street, around to the south.

Early photographs of buildings set around this area show the importance of this junction within the town. The Post Office was on the south east corner, in the 19th century, at a key point for messaging with use of telegrams and also a point at which collection was easy for those delivering and collecting post. This grand building was mirrored on the south west side with a building that became a bank at the turn of the 20th century - on the north west corner, the entrance to the building related directly to the crossroads. On the north east corner, the building remains but has been significantly altered at ground floor level, being a much more prominent shop front in the early 1900's.

With the introduction of a new road system, that can be seen in maps from 1970's onwards, the importance of the key buildings at the crossroads diminished and as such, the architecture of this area changed as well, with a number of gable fronted Victorian buildings erected at the turn of the 20th century between the old post office corner and the Guildhall being quickly demolished and replaced with mid century buildings with integrated shop fronts at ground floor level.

The location of the town centre of Chard has changed and could now be considered to be more adjacent to the Guildhall, however the importance of the shops on Holyrood Street should be emphasised in any proposals for development at this key point of Fore Street and High Street.



1. Holyrood Street Pre 1890
2. Holyrood Street circa 1920
3. Cornhill crossroads looking south circa 1900's. N.P. Bank remains in position (now Greenslades)
4. Cornhill crossroads looking east , with post office on south east corner. pre 1890.
5. Cornhill Crossroads 1889
6. Looking east down Fore Street - new builds beyond Post Office
7. Cornhill Crossroads 1920
8. Cornhill Crossroads 1961

Appendix B: Consultation Report

The council has an adopted Statement of Community Involvement (SCI) which creates a clear framework for consultation relating to Local Plan documents. In accordance with the process for creating an SPD, the Chard Shop Front Design Guide has been subject to appropriate consultation.

PART 1: Informal Consultation

1.1 Consultation Format

- 1.1.1 Informal consultation was carried out during October 2021 to shape the drafting of the Chard Shop Front Design Guide.
- 1.1.2 A press release was issued and letters were sent by email to the relevant statutory and general Local Plan consultees in the Area West, as well as all District Councillors, to notify key stakeholders and the public that a new Shop Front Design Guide for Chard was being drafted, and to invite them to put forward their views in the early-stage consultation. As a funding partner in the High Street Heritage Action Zone, Historic England also reviewed an early draft of the document.
- 1.1.3 The consultation took the form of three public consultation events at Chard Guildhall – running alongside the Future Chard Strategy consultation – and an online consultation on the Council’s consultation website.

1.2 Consultation Response

- 1.2.1 Over 100 people attended the in-person public consultation events with 46 people providing their comments. A further 29 people participated online. Respondents to the public consultation included members of the public as well as representatives of local businesses, Abri (housing association), Chard Baptist Church and Historic England.
- 1.2.2 In addition, we received letters from Avon & Somerset Police and Natural England, and an email from Historic England.

1.3 Public Consultation Results

- 1.3.1 We asked: “What invites you to enter a shop? What makes a shop attractive to you?” Respondents were asked to tick 3 choices from a list of shop-front characteristics.

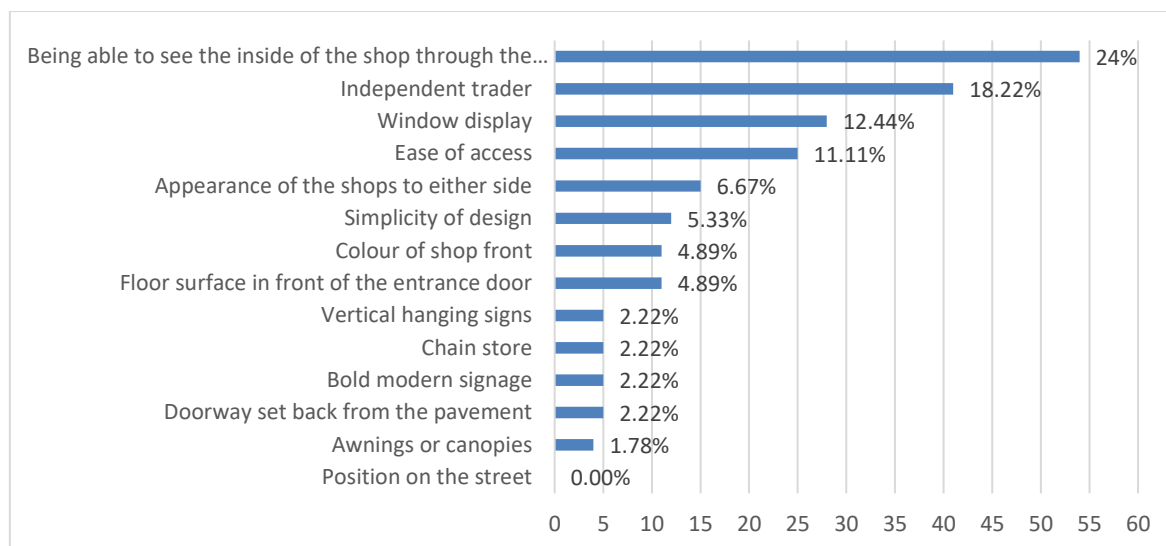


Figure 1: Quantitative Data: "What invites you to enter a shop? What makes a shop attractive to you?"

1.3.2 The results show that being able to see into the shop through the window is very important, with nearly a quarter of all respondents selecting this. Independent traders are considered to be more attractive than chain stores. Window displays are a draw, and ease of access is also important.

1.3.3 A free-text section to the questionnaire invited people to provide their own commentary. The qualitative data collected here backed up the points made above, but also highlighted some other key themes:

- A good standard of decoration makes a shop attractive – clean and tidy, not dirty or paint peeling, a need to renovate (17%)
- Good window dressing makes a shop attractive, including creative seasonal display and product display (7%)
- Shops should be in-keeping with the local character/history/tradition (7%)
- Individuality is important (5%)

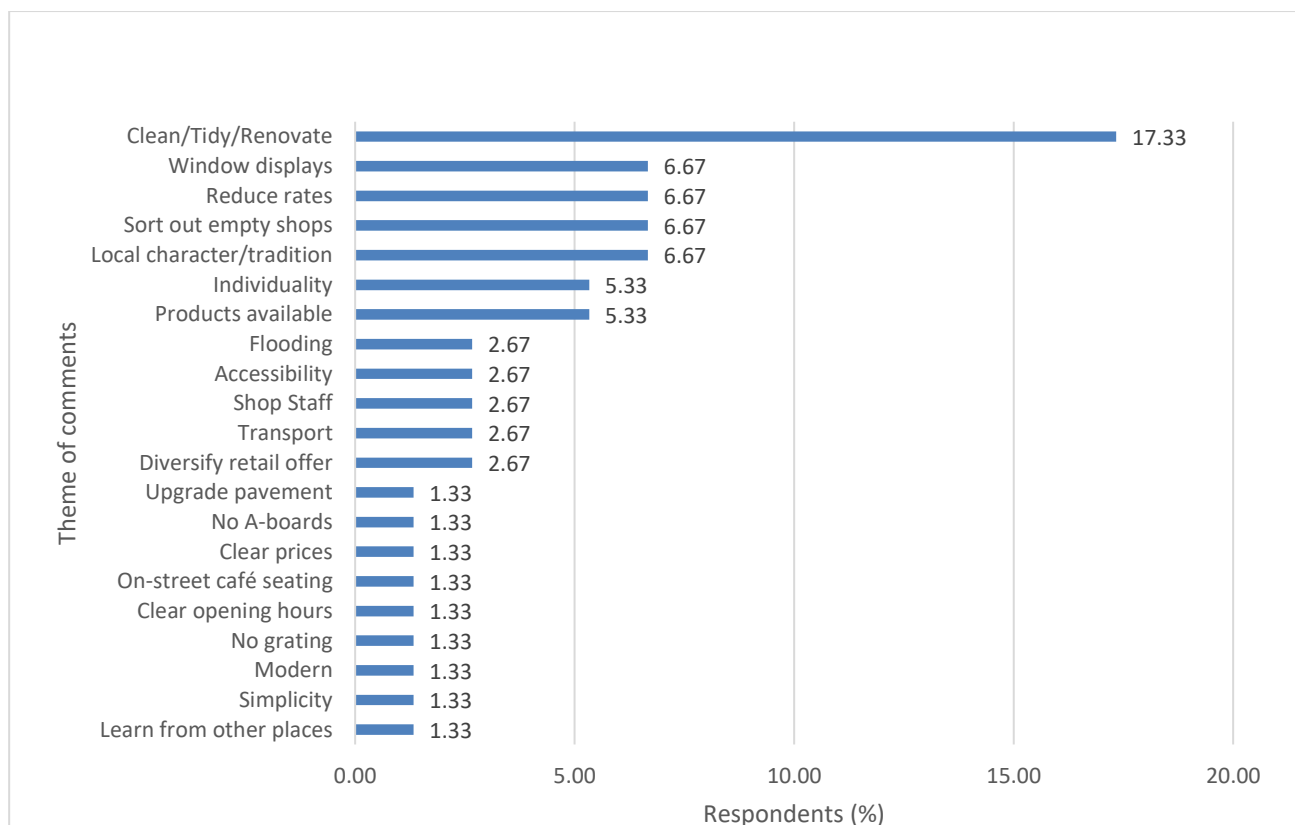


Figure 2: Coded Qualitative Data: "Any further comments?"

1.3.4 The consultation attracted suggestions to fill the empty shops (7%), reduce business rates (7%) and diversify the town centre retail offer (3%). Although the Shop Front Design Guide cannot directly address these sorts of issues, it is one part of a package of Chard Regeneration/High Street Heritage Action Zone interventions which are set to revitalise the town centre.

1.3.5 There were also comments on the importance of parking or public transport, and the need to address local flooding issues, which are considered beyond the scope of the Shop Front Design Guide.

1.3.6 The comments from the public have been used during the development of the draft Chard Shop Front Design Guide to shape its intent and recommendations. Reference to the consultation is woven throughout the document, with direct quotes used to give weight to its key principles.

1.4 Statutory Consultee Responses

Avon & Somerset Police

1.4.1 Avon & Somerset Police submitted a response concerning shop front security, including shutters/grilles, glazing, stall risers, alarms and doorways. The information provided has been referenced in detail in the draft Chard Shop Front Design Guide.

Natural England

1.4.2 Natural England declined to provide specific comments, noting that the Shop Front Design Guide was unlikely to have major effects on the natural environment. The general comments that were provided are more applicable to the green infrastructure policies of the Local Plan, rather than those which this Shop Front Design Guide is supporting.

Historic England

1.4.3 Historic England provided direct comments on an early draft of the Chard Shop Front Design Guide. These included support for:

- including a summary of Chard's shopfront features across different periods, and a summary history of Chard;
- the proposed colour palette;
- the level of detail;
- including illustrations and historic photographs, and sketches of how things could look.

1.4.4 Suggestions were also made for including post-war shop front examples, examples of good alternatives to poor design, and reference to the Conservation Area and National Heritage List for England. These comments were incorporated into the draft.

PART 2: Formal Consultation

2.1 Consultation Format

2.1.1 Following approval by District Executive, formal consultation on the draft Chard Shop Front Design Guide was carried out from Friday 10th December 2021 until Friday 21st January 2022. This was a period of 6 weeks, 2 weeks longer than the required 4-week consultation period for Supplementary Planning Documents, to account for the Christmas period. The Town and County Planning (Local Planning) (England) Regulations 2012 set out the framework for the preparation, consultation and adoption of supplementary planning documents.

2.1.2 Hard copies of the draft Guide and consultation statement were made available to view in person at Chard Guildhall (Chard Town Council) and at SSDC's Petters House. Forms to collect in-person responses were provided. An email address was also provided for any responses.

2.1.3 The draft Guide and consultation statement were also available to view online on the Council's consultation portal (Citizen Space) along with a survey to collect responses.

2.1.4 All consultees on the Local Plan consultation database were contacted to notify them of the consultation. This included the statutory agencies.

- 2.1.5 Individuals who had taken part in the initial consultation and had asked to be kept informed were also notified, along with those who have registered to be kept informed of the Chard High Street Heritage Action Zone, were notified directly.
- 2.1.6 All elected members for South Somerset District Council, Somerset County Council and town and parish councilors in the South Somerset District area were also notified directly. The consultation was advertised more widely via press releases and social media posts.
- 2.1.7 The environmental statutory consultees (Natural England, Historic England and Environment Agency) were sent a copy of the draft Guide along with the Strategic Environmental Assessment/Habitats Regulations Assessment screening assessment for their comment.

2.2 Consultation Response

- 2.2.1 Eight submissions were received during the public consultation. This is in line with officer expectations from past experience, given that it is on a very specific topic, within a tightly defined geographic area of the district. The Yeovil Public Realm Design Guide received a similar response rate during its formal consultation.
- 2.2.2 The table on the following pages provides a schedule of all representations made during the formal consultation period along with a summary of the main issues and how they have been addressed. In accordance with data protection legislation, personal data has been redacted.
- 2.2.3 The representations include the three statutory environmental stakeholders, whereby no comments have been received in contradiction to our Strategic Environmental Assessment/Habitats Regulations Assessment screening assessment.

| | Representation | Summary of Main Issues | Action Taken |
|----|--|--|--------------------|
| 1. | <p>DORSET COUNCIL Service Manager for Conservation, Economic Growth and Infrastructure</p> <p>Thank you for consulting Dorset Council on this document. Officers have looked through the document. We have no specific comments, but are supportive of the approach taken. In particular, the use of photos to illustrate good and inappropriate design enables non experts to see clearly the reasoning behind the proposals.</p> | <ul style="list-style-type: none"> • Supportive • Positive feedback on use of photos | No action required |
| 2. | <p>ENVIRONMENT AGENCY Sustainable Places – Planning Advisor</p> <p>Thank you for referring the above Draft SPD, which was received 10 December 2021. The Environment Agency would have no comments to make concerning the Chard Shop Front Design Guide SPD. Please quote the Agency's reference on any future correspondence regarding this matter.</p> | <ul style="list-style-type: none"> • No comments | No action required |
| 3. | <p>NATIONAL HIGHWAYS Planning Manager (Highways Development Management), Operations</p> <p>Thank you for consulting National Highways on the Chard Shop Front Design Guide Draft supplementary planning document.</p> <p>We note that the guidelines set out the requirements relating to the design, accessibility and security of shop fronts and as such we have no specific comments to make in this regard.</p> <p>We would suggest that any proposals which seek to materially alter existing vehicular movements or parking provision associated with such outlets are carefully considered, in order to maintain the safe and efficient operation of both the Local and Strategic Road Networks.</p> | <ul style="list-style-type: none"> • No comments on shop front design/access/security • Recommendation regarding vehicle movement – outside the scope of the SPD | No action required |

| | Representation | Summary of Main Issues | Action Taken |
|----|--|--|--------------------|
| 4. | <p>NATURAL ENGLAND Sustainable Development Lead Advisor, Wessex Area Team</p> <p>Thank you for your consultation dated and received by Natural England 10th December 2021.</p> <p>Natural England has previously commented on this proposal and made comments to the authority in our letter dated 1st November 2021 (attached). <i>[See below]</i></p> <p>The advice provided in our previous response applies equally to this resubmission and we maintain our no objection to the proposal.</p> <p>Natural England notes that your authority, as competent authority under the provisions of both the Environmental Assessment of Plans and Programmes Regulations 2004 and the Habitats Regulations, have screened the proposal to check for the likelihood of significant effects.</p> <p>Your assessment concludes that the proposal can be screened out from further stages of assessment because significant effects on the natural environment are unlikely to occur, either alone or in combination. On the basis of the information provided, Natural England concurs with this view.</p> <p>Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again. Before sending us the amended consultation, please assess whether the changes proposed will materially affect any of the advice we have previously offered. If they are unlikely to do so, please do not re-consult us.</p> | <ul style="list-style-type: none"> • No new comments (further to those made during the informal consultation, which were previously taken account of, see 1.4.2 above) • No objections • Agreement with environmental screening | No action required |

| | Representation | Summary of Main Issues | Action Taken |
|--|--|------------------------|--------------|
| | <p><i>[Text from the letter dated 1st November 2021:]</i></p> <p>Thank you for your consultation request on the above dated and received by Natural England on 21st October 2021.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature.</p> <p>While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major effects on the natural environment, but may nonetheless have some effects. We therefore do not wish to provide specific comments, but advise you to consider the following issues:</p> <p>Green Infrastructure This SPD could consider making provision for Green Infrastructure (GI) within development. This should be in line with any GI strategy covering your area.</p> <p>The National Planning Policy Framework states that local planning authorities should ‘take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure’. The Planning Practice Guidance on Green Infrastructure provides more detail on this.</p> | | |

| | Representation | Summary of Main Issues | Action Taken |
|--|---|------------------------|--------------|
| | <p>Urban green space provides multi-functional benefits. It contributes to coherent and resilient ecological networks, allowing species to move around within, and between, towns and the countryside with even small patches of habitat benefitting movement. Urban GI is also recognised as one of the most effective tools available to us in managing environmental risks such as flooding and heat waves. Greener neighbourhoods and improved access to nature can also improve public health and quality of life and reduce environmental inequalities.</p> <p>There may be significant opportunities to retrofit green infrastructure in urban environments. These can be realised through:</p> <ul style="list-style-type: none"> • green roof systems and roof gardens; • green walls to provide insulation or shading and cooling; • new tree planting or altering the management of land (e.g. management of verges to enhance biodiversity). <p>You could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans.</p> <p>Further information on GI is include within The Town and Country Planning Association's "Design Guide for Sustainable Communities" and their more recent "Good Practice Guidance for Green Infrastructure and Biodiversity".</p> <p>Biodiversity enhancement</p> <p>This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraph 118 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential</p> | | |

| | Representation | Summary of Main Issues | Action Taken |
|--|---|------------------------|--------------|
| | <p>Design Guide SPD, which advises (amongst other matters) a ratio of one nest/roost box per residential unit.</p> <p>Landscape enhancement The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might makes a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts. For example, it may be appropriate to seek that, where viable, trees should be of a species capable of growth to exceed building height and managed so to do, and where mature trees are retained on site, provision is made for succession planting so that new trees will be well established by the time mature trees die.</p> <p>Other design considerations The NPPF includes a number of design principles which could be considered, including the impacts of lighting on landscape and biodiversity (para 180).</p> <p>Strategic Environmental Assessment/Habitats Regulations Assessment A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic</p> | | |

| | Representation | Summary of Main Issues | Action Taken |
|----|--|---|--------------------|
| | <p>Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.</p> <p>Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.</p> <p>Please send all planning consultations electronically to the consultation hub at consultations@naturalengland.org.uk</p> | | |
| 5. | <p>ANON-BQV3-KSNS-U</p> <p>It appears that the main theme of these proposals is to basically repaint the shop fronts in heritage colours.... This will do little, if anything, to increase footfall in the town centre, which is what is needed for regeneration to succeed.</p> <p>If the town centre is to have any chance of competing with edge of town retail outlets then the playing field needs to be levelled as much as possible. Two hours free parking would have much more impact on footfall than painting a few shop fronts in heritage colours...</p> | <ul style="list-style-type: none"> • Concern over impact of SPD – comment doesn't reflect full scope of the document, which is made clear in the introduction. • Parking suggestion – outside the scope of the SPD. | No action required |
| 6. | <p>ANON-BQV3-KSNZ-2</p> <p>My query is with replacement of windows of first floor flat above [REDACTED].</p> | | |

| | Representation | Summary of Main Issues | Action Taken |
|----|---|--|--|
| | <p>[REDACTED] although have enquired a few times over the years with Chard Council with the wish to replace the rotten wood, single pain sash windows with identical timber sash but double glazed, but have been turned down as listed building & supposedly not in keeping with the original Georgian look, having pointing out the [REDACTED] sign is hardly in keeping with the Georgian Look falling on deaf ears I had been left with no alternative other than to continually have timber & glass repaired, however I believe now is the time for the authorities to not only allow proper replacement as a matter of safety reasons particularly for my tenants but to also contribute financially as Chard is receiving its regeneration & face-lift!</p> | <ul style="list-style-type: none"> • Comment relating to specific property, Listed Building consent and the Chard HSHAZ scheme, rather than content of the SPD. | <p>No action required for SPD.</p> |
| 7. | <p>HISTORIC ENGLAND Historic Environment Planning Adviser (South West)</p> <p>Thank you for consulting Historic England on the draft Chard Shopfront Design Guide (November 2021) and the associated Strategic Environmental Assessment (SEA) Screening Report (November 2021).</p> <p>As the Government's statutory adviser on the historic environment, Historic England is keen to ensure that the conservation, enhancement and enjoyment of the historic environment is taken into account when preparing planning documents like these, given that heritage assets are an irreplaceable resource. This reflects national policy as set out in chapter 16 of the National Planning Policy Framework (NPPF) 2021, which requires heritage assets to be conserved in a manner appropriate to their significance and enjoyed for the benefit of existing and future generations.</p> <p>Draft Chard Shopfront Design Guide</p> | <ul style="list-style-type: none"> • Strong support for SPD's intent and its adoption • Suggestions to improve the SPD's usability and usefulness: <ul style="list-style-type: none"> ○ Editorial and presentational changes ○ Correcting an error in | <p>The SPD has been reviewed for its presentational style as suggested, including editing down repetitive sections; some sections moved to appendices; font size increased; greater use of text boxes to draw attention to key points; links to relevant information sources added; more Chard</p> |

| | Representation | Summary of Main Issues | Action Taken |
|--|---|--|---|
| | <p>Historic England strongly supports the preparation of this Design Guide and the Council's intention to adopt it as a Supplementary Planning Document (SPD). This SPD will assist with implementing policies EQ2: General Development and EQ3: Historic Environment in the adopted South Somerset Local Plan (amongst others). It will also be a great help with the delivery of the building repair grants scheme, a key project within the Chard High Street Heritage Action Zone (HSHAZ).</p> <p>We have considered the contents of the draft SPD and strongly support their intent. However, we have the following comments and suggestions for improving the usability and usefulness of this Design Guide:</p> <ul style="list-style-type: none"> Although the draft SPD contains a wealth of information and variety of images, it is long and text heavy. We suggest ways are explored to deliver the outline building principles, good design principles and the checklist in a shorter and more user friendly way so that key messages do not get lost. For example, you could reduce the word count by removing repetitive or similar information from sections 1 and 2 and making more use of captions with pictures instead of text; remove or appendicise less relevant material such as the outline history of Chard; and alter the layout with better text size and spacing, greater use of headings and text boxes, and more interspersing of images and text to illustrate the principles. Planning Policy Guidance Note 12 referred to in the Preface is no longer in existence (p3) – please see the National Planning Policy Framework and the associated PPG at paragraph 008 on the <u>role of SPDs</u>. In sections 2 and 3, there are a mix of examples from Chard and elsewhere used to illustrate the shopfront styles and good design. | <p>Planning Policy reference in preface</p> <ul style="list-style-type: none"> Adding in advice on bi-fold doors, independent access to upper floors, and alteration or removal of shop fronts Providing links to other relevant information sources Agreement with environmental screening | <p>examples used where possible.</p> <p>Planning Policy reference in the preface checked and corrected.</p> <p>Bi-fold doors advice not considered to be relevant to Chard; however, guidance has been added regarding access to upper floors, and alteration or removal of shop fronts</p> |

| | Representation | Summary of Main Issues | Action Taken |
|--|--|------------------------|--------------|
| | <p>However, it the SPD would be more useful if more Chard examples could be used and highlighted where they are used. We appreciate there may be sensitivities over using local examples of poor design.</p> <ul style="list-style-type: none"> • In section 3, you may wish to consider advising on when bi-folding doors may be appropriate with some design parameters to recognise that they allow more activity onto streets. • The residential use of upper floors is encouraged in section 3, which is welcome. However, you should also consider including advice with images on how to provide independent access to them within frontages. • Although we welcome the inclusion of advice on shopfront retention (e.g. on p9 and p25), the SPD could usefully advise on how these can be altered where necessary (e.g. to provide privacy and/or passive ventilation) and/or the approach to shopfront removals when commercial uses cease, e.g. for residential conversions. • The SPD could also provide links to other useful information sources, e.g. Chard Conservation Area Appraisal (2012) and relevant Historic England advice and guidance, including <u>Easy Access to Historic Buildings</u> (2015) and <u>Shopping Parades</u> (2016). <p>We draw your attention to two recent shopfront design guides in the South West that may assist you in considering your response to our comments:</p> <ul style="list-style-type: none"> • North Somerset Council's <u>Shopfront Design Guide</u> (adopted 2019) – an example of a longer-style document; | | |

| | Representation | Summary of Main Issues | Action Taken |
|----|--|---|--|
| | <ul style="list-style-type: none"> Tewkesbury Borough Council's <u>Draft Shopfronts, Shutters and Signage Design Guidance</u> (2021) – an example of a shorter-style document <p>SEA Screening Statement We have considered the information presented in the SEA Screening Statement. In terms of our area of interest and given the nature of the SPD, we concur with your assessment that the document is unlikely to result in any significant environmental effects and will simply provide additional guidance to existing and emerging development plan policies, which have already been subject to a Sustainability Appraisal/SEA. As a result, we would endorse the Authority's conclusions that it is not necessary to undertake Strategic Environmental Assessment of this particular SPD.</p> <p>Thank you for the opportunity to comment on the Draft Chard Shopfront Design Guide SPD and associated SEA Screening Statement once again.</p> <p>Please do not hesitate to contact me if you have any queries about our comments. My colleague [REDACTED] is Historic England's project lead for the Chard HSHAZ and is also available to discuss this SPD.</p> | | |
| 8. | <p>SOMERSET COUNTY COUNCIL AS THE HIGHWAY AUTHORITY Principal Planning Liaison Officer, South Somerset District</p> <p>Having had a look at the document the Highway Authority submits the following comments for consideration;</p> <ul style="list-style-type: none"> No new part of any frontage, including hanging signs, foundations, awning, canopies, or other structural elements should encroach onto, or oversail land covered by highway rights. | <ul style="list-style-type: none"> A number of suggested additions in relation to the impact of shop | <p>An appendix has been added to the SPD to cover these points</p> |

| | Representation | Summary of Main Issues | Action Taken |
|--|---|------------------------|--------------|
| | <ul style="list-style-type: none"> Any existing element which does oversail the highway must be covered by an appropriate licence under s177 or s178 Highways Act 1980 All doors and windows should open inwards and not out onto highway Seating and tables on highway should be covered by an appropriate licence. No displays of produce or merchandise including any shelving, tables, rails, racks or similar equipment will be allowed on land covered by highway rights No advertising material including free standing signs, 'A' frames or similar elements will be placed on highway All illuminated signage should confirm to the Institute of Lighting Engineers current guidance with regard to illumination levels, and all lit infrastructure should be so positioned and shielded so as not to create a dazzle or glare problem for highway users. <p><i>[The first two bullet points were subsequently clarified as follows:]</i></p> <ul style="list-style-type: none"> No new part of any frontage, including hanging signs, foundations, awning, canopies, or other structural elements should encroach onto land covered by highway rights. The removal of highway rights in order to construct new frontages will not be acceptable. Any new or existing element which oversails the highway must be covered by an appropriate licence under s177 or s178 Highways Act 1980. Such elements must be structurally sound and ensure that the level of height clearance beneath them meets a minimum level. Obviously, height clearance over carriageway would need to be higher than over footway to accommodate the largest lorries to use the routes. | fronts on the highway | |

SOUTH SOMERSET DISTRICT COUNCIL

Shop Front Design Guide Supplementary Planning Document

ADOPTION STATEMENT

Town & Country Planning (Local Planning) (England) Regulations 2012

In accordance with Regulation 14 and Regulation 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012, notice is hereby given that South Somerset District Council formally adopted a Shop Front Design Guide Supplementary Planning Document (SPD) at its Council meeting on 17th March 2022, having taken into account the representations received on a consultation draft.

The SPD supports the planning policies of the adopted South Somerset Local Plan (2006-2028) in particular the Policies *EQ2: General Development* and *EQ3: Historic Environment*. The SPD has been developed for use in relevant planning decisions where it will be a 'material consideration'. It sets out guidance to support businesses and property owners in Chard to improve the standard of design when altering or replacing shop fronts and associated signage.

The SPD; a schedule of representations made during the formal consultation period along with a summary of the main issues and how they have been addressed; and a copy of this Adoption Statement can be viewed on the Council's website at www.southsomerset.gov.uk The SPD and this Adoption Statement are also available for inspection during office hours at:

- Customer Connect, Petters House, Petters Way, Yeovil BA20 1AS
- The Guildhall, 14 Fore Street, Chard TA20 1PH

In accordance with Regulation 11 of the Town and Country Planning (Local Planning) (England) Regulations 2012, any person aggrieved by the decision to adopt the SPD may apply to the High Court for permission to apply for a judicial review of that decision. Any such application must be made promptly, and in any event, not later than 3 months after the date on which the SPD was adopted, which is 17th March 2022.

For further information about the Chard Shop Front Design Guide, please contact the Chard Regeneration team on 01935 462462 or chardregen@southsomerset.gov.uk.

South Somerset District Council, Chard Regeneration, Council Offices, Brympton Way, Yeovil BA20 2HT.

8th February 2022

Chard Shop Front Design Guide Supplementary Planning Document (SPD) SEA/HRA Screening Report

1. Introduction

1.1. This screening assessment is to determine whether the Chard Shop Front Design Guide Supplementary Planning Document (SPD) requires either or both of the following:

- Habitats Regulation Assessment (HRA) under European Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora (the “Habitats Directive”) and associated Conservation of Habitats and Species Regulations 2010 (“Habitat Regulations”), and / or;
- Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004. In the case of this being required then a wider Sustainability Appraisal (SA) may also be necessary.

1.2. The SPD will provide design guidance for Chard shop fronts, to supplement policies within South Somerset’s adopted Local Plan 2006-2028. The SPD sets out detailed guidance on the design and delivery of shopfronts in Chard town centre. It does not provide new policies, elaborating only on policies within the Local Plan to assist implementation (namely EQ2 General Development and EQ3 Historic Environment). The Local Plan policies have been subject to SEA as part of a SA.

1.3. The legislative background set out below outlines the regulations that require the need for this screening exercise. Sections 3 and 4 provide a screening assessment of the likely significant environmental effects of the SPD and examine the need for a HRA and an SEA respectively.

2. Legislative Background

2.1. In respect of HRA (which relates to internationally important nature conservation sites), the aim of this screening is to establish whether the SPD is likely to give rise to significant effects which have not been formally assessed in the context of the HRA of the Local Plan or in the context of issues that might have arisen in relation to protected sites since this time. The requirement under the “Habitats Directive” is to consider potential impacts on sites of European importance for Nature Conservation. This is done through a process referred to as a Habitats Regulation Assessment which starts with a screening stage and may need to be followed with more detailed examination through an “Appropriate Assessment”.

2.2. The requirement for a Strategic Environmental Assessment (SEA) arises from the European Directive 2001/42/EC “on the assessment of the effects of certain plans and programmes on the environment” (SEA Directive). This Directive was transposed in UK law by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations). This legislation places an obligation on local authorities to undertake a SEA on any plan or programme prepared for town and country planning or land use purposes and which sets the framework for future development consent of certain projects.

2.3. The 2008 Planning Act removed the requirement to undertake an SA for an SPD, although this did not replace the requirement to establish whether an SPD required SEA (see Explanatory Memorandum to the Town and Country Plan (Local Development) (England) (Amendment) Regulations 2009 No 401). Therefore this report focuses on screening for SEA and the criteria for establishing whether a full Assessment is needed. **SPDs will only require SEA if they are likely to have significant environmental effects that have not already have been assessed during the preparation of the Local Plan.**

2.6. There is some potential overlap between the two types of assessment; in particular an identified requirement for an “Appropriate Assessment” under the Habitat Regulations will automatically trigger a requirement for SEA (unless a “local level” or “minor modification” exemption applies). In this report, Section 3 considers the potential need for HRA whilst Section 4 does the same in respect of SEA.

2.7. There is a duty to consult with specified environmental organisations (Natural England, Historic England and the Environment Agency) when determining the need for SEA for development falling within the criteria set by this Regulation. In situations where SEA is not deemed to be required, the Council has a duty to prepare a statement of its reasons for determining that SEA is not required. The SEA Screening Statement should provide sufficient information to demonstrate whether the SPD is likely to have significant environmental effects. If it is concluded that there are not likely to be significant environmental effects, and therefore no need for SEA, this statement will clearly indicate the reasons for such a decision.

3. Screening for Habitats Regulation Assessment (HRA)

3.1. It is a requirement under the Habitats Directive that the potential effects of “plans or projects” on designated European sites (Special Areas of Conservation/Special Protection Areas, also referred to as “Natura 2000 sites”) are considered, and where necessary are appropriately assessed. Regulation 61(1) of The Conservation of Habitats and Species Regulations 2010 states:

A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which —



- a) *is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and*
- b) *is not directly connected with or necessary to the management of that site,*

must make an appropriate assessment of the implications for that site in view of that site's conservation objectives.

The authority may agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site (Regulation 61(5)).

3.2. Therefore, where a plan or project is “*not directly connected with or necessary to the management of a [Natura 2000] site*”, the first stage in the HRA process is to establish whether a “*significant effect*” is likely. This is referred to as the “screening stage”. If it is found that a significant effect is not likely then no further action is required but if potential effects are identified and deemed to be significant then further “*Appropriate Assessment*” is required and used as a tool to help modify the plan or project to ensure that impacts are removed or if this is not possible mitigated to prevent an adverse effect upon the integrity of the European site.

3.4. As the competent authority under The Conservation of Habitats and Species Regulations 2010 (the Habitats Regulations), South Somerset District Council was required to assess its Local Plan through the HRA process, as policies and site allocations in the plan could have potentially affected Natura 2000 sites within or near the District.

3.5. The Chard Shop Front Design Guide SPD is not a plan or project which will be implemented in its own right – it expands upon adopted policies within the Local Plan – most specifically EQ2 General Development and EQ3 Historic Environment. It is restricted to the area of Chard town centre defined on the Local Plan Policies Map. The policies within the Local Plan related to the SPD have already been subject to HRA and measures to address the identified likely significant effects on the integrity of sites from development proposals have been set out in Local Plan policies. The SPD does not introduce new proposals of a type and/or scale outside the parameters of the Local Plan or amend any of the proposed mitigation measures agreed.

3.6. Since the adoption of the Local Plan, this Council, along with the other Somerset Council's as well as Dorset Council received a [letter](#) from Natural England concerning high levels of phosphates in the Somerset Levels and Moors and stressing the need to protect them from further phosphate pollution. In light of a court judgement (known as Dutch N), Natural England have advised SSDC that, in light of the unfavourable condition of the Somerset Levels and Moors Ramsar Site, before determining a planning application/submission that may give rise to additional phosphates within the catchment, competent authorities should undertake a Habitats Regulations Assessment (HRA).

3.7. As the SPD is only guidance on the design of new shopfronts, it is not proposing

development that will give rise to additional phosphates within the Somerset Levels and Moors Ramsar Site catchment.

3.8. It is therefore considered that the Chard Shop Front Design Guide SPD is not likely to have a significant effect on a European site. This means that an “Appropriate Assessment” is not required.

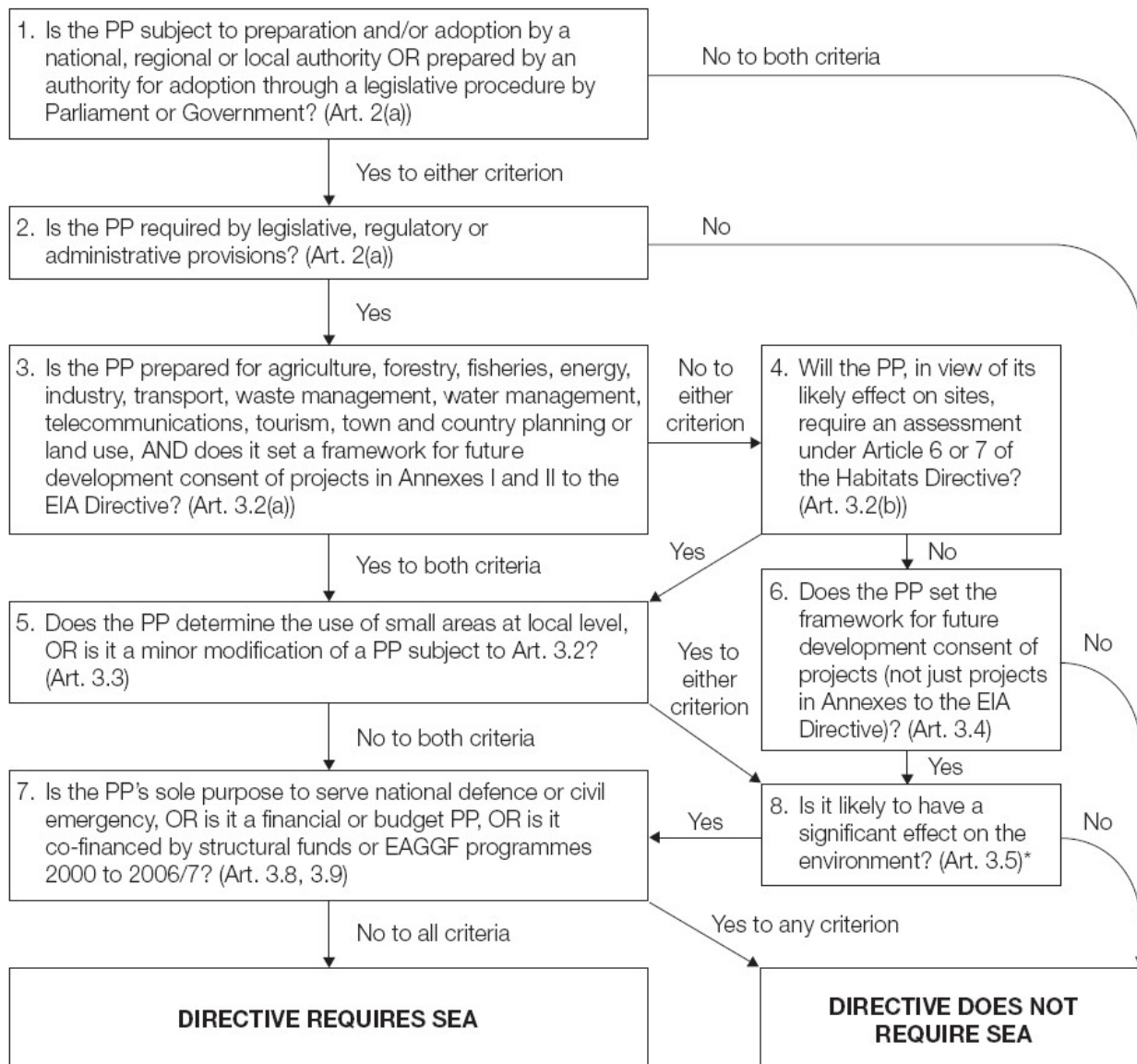
4. Screening for Strategic Environment Assessment

4.1. The requirement to undertake SEA applies to plans and programmes which are subject to preparation or adoption by an authority at a national, regional or local level. In order to establish whether SEA is required, the fundamental consideration is whether the document is likely to have ‘significant environmental effects’.

4.2. The best way to determine this is to carry out a screening assessment. If the screening assessment indicates that there could be significant environmental effects, an SEA is needed. The following diagram illustrates the process for screening a planning document to ascertain whether a full SEA is needed:

Figure 2 – Application of the SEA Directive to plans and programmes

This diagram is intended as a guide to the criteria for application of the Directive to plans and programmes (PPs). It has no legal status.



*The Directive requires Member States to determine whether plans or programmes in this category are likely to have significant environmental effects. These determinations may be made on a case by case basis and/or by specifying types of plan or programme.

Source: A Practical Guide to the Strategic Environmental Assessment Directive, ODPM, 2005

4.3. Table 1 below sets out the Council's response to the above questions in order to clearly assess the need for an SEA. Table 2 provides the Council's assessment of likely significant effects, in accordance with the screening report process in Table 1.

Table 1: SEA Screening of the Chard Shop Front Design Guide SPD

| SEA Screening Questions | Screening Assessment of the Chard Shop Front Design Guide SPD |
|--|---|
| 1. Is the plan or programme subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government (Art. 2(a))? | Yes – the SPD is prepared and subject to adoption by a local planning authority, South Somerset District Council. <i>(Yes to either criteria – go to question 2)</i> |
| 2. Is the plan or programme required by legislative, regulatory or administrative provisions (Art. 2(a))? | Yes – the SPD is produced to aid delivery of the statutory Local Plan. The SPD supports the regeneration of Chard town centre. <i>(Yes – go to question 3)</i> |
| 3. Is the plan or programme prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use AND does it set the framework for future development consent for projects listed in Annexes I and II to the EIA Directive (Art 3.2(a))? | Yes – it is an SPD prepared for town and country planning and land use and provides detail and additional guidance to the Local Plan policy framework for future consent of new shopfronts. No – this does not include projects listed in Annexes I & II of the EIA Directive or Schedules 1 and 2 of the The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 <i>(No to one or both criteria – go to question 4)</i> |
| 4. Will the plan or programme, in view of its likely effect on sites, require an assessment under Article 6 or 7 of the Habitats Directive (Art 3.2(a))? | No – it is an SPD prepared to guide the design of shop fronts within the defined area of Chard Town Centre. It is considered that this form of development is not likely to have a significant effect on a European site. <i>(No – go to question 6)</i> |

| | |
|--|--|
| 6. Does the plan or programme set the framework for future development consent of projects (not just projects in Annexes I & II of the Directive)? | No – this is the development plan (the adopted Local Plan). The SPD will be a material consideration in the consideration of planning applications for new shop fronts within Chard town centre. It provides detailed guidance to adopted Local Plan Policy EQ2 General Development. <i>(No – Directive does not require SEA)</i> |
|--|--|

Table 2: Determining the likely significance of effects on the environment

| SEA Directive Criteria Schedule 1 Environmental Assessment of Plans and Programmes Regulations 2004 | Summary of significant effects |
|--|---|
| 1. Characteristics of the Chard Shop Front Design Guide SPD having particular regard to : | |
| (a) The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources | The SPD will not set a framework for other projects or activities- it is providing additional guidance on existing policies within the Local Plan that have been subject to SEA. |
| (b) The degree to which the plan or programme influences other plans and programmes including those in a hierarchy | The SPD will have less material weight than the existing Local Plan policies, which have been subject to SEA. It sits below 'higher tier' development plan documents and does not set new policies. |
| (c) The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development | The SPD provides guidance on the interpretation of existing local plan policies and national guidance, all of which promote sustainable development. The SPD does not introduce new policy. |
| (d) Environmental problems relevant to the plan or programme | There are no negative environmental issues associated with this SPD, moreover the SPD seeks where possible to achieve environmental improvements via good quality design to enhance the historic urban environment. |



| | |
|--|--|
| (e) The relevance of the plan or programme for the implementation of [European] Community legislation on the environment (for example, plans and programmes linked to waste management or water protection) | The SPD is not directly relevant to the implementation of community legislation. It offers guidance on the implementation of existing Local Plan policies, which have been subject to SEA, to provide further positive effects. |
| 2. Characteristics of the effects and of the area likely to be affected by the Chard Shop Front Design Guide SPD, having regard, in particular, to: | |
| (a) The probability, duration, frequency and reversibility of the effects | The SPD provides guidance aimed at ameliorating the negative impact of new developments. It is anticipated to have positive and beneficial effects on the built environment of Chard town centre. It offers guidance on the implementation of existing Local Plan policies, which have been subject to SEA, to provide further positive effects. |
| (b) the cumulative nature of the effects | The effects of this SPD will be largely beneficial; therefore any cumulative effects will also be beneficial e.g. the use of better quality design materials in several developments within local area will create a better quality built environment. |
| (c) the transboundary nature of the effects | The SPD is unlikely to result in any transboundary effects, as it is limited to Chard town centre. |
| (d) the risks to human health or the environment (e.g. due to accidents) | The SPD does not present any risk to human health or the environment; conversely it aims to encourage improvements in these areas. |
| (e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected) | The SPD will be applied to all relevant planning applications in Chard town centre so has very limited 'local' scale. |
| (f) the value and vulnerability of the area likely to be affected due to: <ul style="list-style-type: none"> • special natural characteristics or cultural heritage • exceeded environmental quality standards or limit values • intensive land-use | The SPD covers Chard town centre so will be relevant in guiding decision-making for proposed developments in a conservation area. It seeks to create quality design informing application of local plan policies. However, it is only offering guidance on the implementation of existing Local Plan policies, which have been subject to SEA, |

| | |
|--|---|
| | to provide further positive effects. It does not propose any new development over and above that proposed by the Local Plan policies. |
| (g) the effects on areas or landscapes which have a recognized national, Community or international protection status. | The SPD is specifically aligned to the area of Chard town centre only, so is only offering guidance on existing Local Plan policies which have been subject to SEA to aid implementation and provide further positive effects. It does not propose any new development over and above that proposed by the Local Plan policies. |

4.4. This screening indicates that a SEA is not required for the Chard Shop Front Design Guide SPD.

5. Determination

5.1. The screening indicates that the Chard Shop Front Design Guide SPD is not subject to HRA or SEA assessment because the SPD does not introduce new policies. It simply provides guidance on existing policies within the adopted Local Plan (Part 1). These policies have been sufficiently appraised via SAs and HRAs.

5.2. The Council considers that the Chard Shop Front Design Guide SPD will not result in any additional significant effects to those already identified in the higher level SAs or in the context of the phosphates issue identified in 2020 within the catchment of the Somerset Levels and Moors Ramsar Site. It will provide more detailed guidance to developers and decision makers to ensure that the positive effects identified in the Local Plan SA are realised and that any neutral and/or negative effects are mitigated further.

6. Consultation

6.1. The Council are in the process of consulting the three statutory environmental bodies – Environment Agency, Historic England and Natural England – on the above draft SEA/HRA screening assessment.

6.2. The SPD will be subject to any changes in response to these statutory agencies on the SEA screening assessment and as such this consultation will be reported to District Executive as part of the update report in March 2022.

19th March 2019

Equality Impact Relevance Check Form



The Public Sector Equality Duty requires us to eliminate discrimination, advance equality of opportunity and foster good relations with protected groups. This tool will identify the equalities relevance of a proposal, and establish whether a full Equality Impact Assessment will be required.

| What is the proposal? | |
|---|--|
| Name of the proposal | Chard Shop Front Design Guide |
| Type of proposal (new or changed Strategy, policy, project, service or budget): | New Supplementary Planning Document |
| Brief description of the proposal: | To support Local Plan policy, new advice on design of shop fronts in Chard |
| Name of lead officer: | Anna Matthews |

You should consider whether the proposal has the potential to negatively impact on citizens or staff in the following ways:

- Access to or participation in a service,
- Levels of representation in our workforce, or
- Reducing quality of life (i.e. health, education, standard of living)

A negative impact is any change that could be considered detrimental. If a negative impact is imposed on any citizens or staff with protected characteristics, the Council has a legal duty to undertake a full Equality Impact Assessment.

| | |
|--|-----------|
| Could your proposal negatively impact citizens with protected characteristics? (This includes service users and the wider community) | NO |
| Could your proposal negatively impact staff with protected characteristics? (i.e. reduction in posts, changes to working hours or locations, changes in pay) | NO |

| | |
|--|--|
| Is a full Equality Impact Assessment required? | NO |
| If Yes, Please provide a brief description of where there may be negative impacts, and for whom. Then complete a full Equality Impact assessment Form | |
| | |
| If No, Please set out your justification for why not. | |
| Consultation was carried out to inform the Guide, both in person and online, to facilitate wide involvement. The new SPD sets out guidance and advice to businesses and property owners who are looking to change or create new shopfronts in Chard. It does not require change to existing infrastructure nor does it introduce new policy. It will be considered in planning decisions and should have a positive impact on citizens e.g. guidance includes improving signage & access into shops. | |
| Service Director / Manager sign-off and date | N Fortt 04/02/22 |
| Equalities Officer sign-off and date | Dave Crisfield 4 th February 2022 |



Review of SSDC Commercial Strategy

Executive Portfolio Holder: Councillor John Clark, Portfolio Holder for Economy / Income generation and commercial services
SLT Lead: Jill Byron, Solicitor and Monitoring Officer
Service Manager: James Divall, Assistant Director (Strategy & Support Services)
Robert Orrett, Commercial Property Land and Development Manager
Contact Details: Robert.orratt@southsomerset.gov.uk or 01935 462075
James.divall@southsomerset.gov.uk or 01935 462261

Purpose of the Report

1. To provide members with a brief review of the Commercial Strategy 2017-2021 and recommend a course of action to cover the period to 31 March 2023, following which the new Somerset Council will take responsibility. The original Strategy was launched in August 2017 and was the subject of a mid-term review in late 2019.

Public Interest

2. This report provides a summary of the history and targets of the Council's Commercial Strategy and makes recommendations for period to 31 March 2023. The general strategy of being more commercial across all council activities to support financial efficiency and value for money will continue, but new investment primarily for yield (e.g. commercial property investment) ceased in December 2021. The commercial property investment portfolio will be retained by the Council and proactively managed to optimise returns over the longer term and continue to provide revenue returns to fund core services.

Recommendations

3. That the report be noted and the Commercial Strategy continue to 31 March 2023 subject to the amendments set out in paragraph 16 of this report.

Background

4. The Commercial Strategy 2017 – 2021, originally adopted in 2017, was updated as part of a mid-term review in 2019 (Appendix). A key intention behind the strategy was to deliver an income for the Council to cover a predicted revenue shortfall, to enable the Council to invest in its priorities (such as regeneration of the market towns) and avoid cutting services (paragraph 1.2.2).
5. Embedding commercial principles and a commercial mind set was key to the strategy (section 1.3), in particular through the application of commercial principles to the Council's operations. The plan was to continue to grow revenue through commercial investment and the development of a commercial services offering to third parties by adopting a commercial approach to income generation (section 2).



6. The objectives set out in the strategy were as follows:

Business Services Objective (3.1) - Each and every business service will look to enhance its yield by 5% p.a. commencing from 2017/8 by reviewing fees, charges, processes, the cost of delivering services and potential to deliver new added value services

Income Generation Objectives (3.2) - to progress investment property proposals that offer a target 7% return on investment across the investment term adopted, and/or provide a consistent balance to the overall investment portfolio in terms of security, liquidity and spread

Other Corporate Plan Objectives and Social Value (3.3) - projects that do not meet income generation criteria but provide some financial return and bring collective benefit to the community in accordance with Corporate Plan objectives will be considered under the appropriate strategy/policy. They will have a different form of assessment criteria and their primary objective may be to deliver a service of community benefit rather than income.

7. A team was put in place to lead delivery of these objectives. Delivery against the objectives was to be measured in the following manner (5.1):

- the level of additional income generated;
- successfully embedding a commercial culture across the organisation by developing and upskilling staff to be more commercially aware, enterprising and innovative;
- increasing commercial activity, demonstrated by the level of additional income achieved, for example by an increase in contribution to fixed costs and overheads or staff costs;
- reducing the net service budgets by reducing variable costs;
- measuring and monitoring additional investment income for increases in turnover, profit and return on investment, as appropriate;
- setting income targets teams that can/are charging for services;
- setting efficiency targets for all teams

8. Additional targets were set as follows (5.2):

- to maintain the Commercial Property, Land and Development Team and deliver new income from Housing, Energy, Property, Land and Development.
- to complete the first investment and commercial programmes delivering a minimum of £2.0m per annum of revenue from property investment and £500k per annum of revenue from commercial services and other service income by year end 2019/20.
- to deliver a minimum of £1.35m per annum of revenue by 2021/22 via the additional capital investment of £75m as outlined in the Financial Strategy and commercial activity and/or existing asset management, be that renewables, commercial or residential property investment, regeneration or development, with a target average of 7% return on investment across all new commercial investment proposals. This will equate to a lower net revenue of 2.5% to 3%, or more, available to the council after accounting and financing provisions.



Note: this additional amount increased the capital pot from £75m to £150m as part of the 2019 review

- to deliver an additional £150k per annum of revenue from commercial services and other service income by year end 2021/22.
- to deliver the Property Project review recommendations for existing assets including potential for disposal, for investment in change of use and retention or letting of existing assets by 2021.
- to review all fees and charges and look to increase them in line with inflation annually, or where more appropriate every four years, in order to maintain 'true value' and cost effective fees and charges.
- to deliver a 5% per annum improvement in yield collectively across all internal services.

Commercial Strategy Review

9. Pre-pandemic, the Council saw positive strides in working towards meeting the 5% yield with a 2018 calculator measuring a 4.6% yield across the organisation (Business Services Objective). Additionally, new strategic projects such as the Electric Vehicle charger network, the council building decarbonisation programmes and the council trading companies were established, in order to create income or provide efficiencies through better operating systems (Other Corporate Plan Objectives and Social Value).
10. The Covid-19 Pandemic had a significant impact on the Council's ability to operate and generate commercial income from services. Within six months of the 2019 Review, key commercial service officers were re-deployed to support pandemic response and recovery efforts leaving little capacity to focus on the strategy's initiatives to drive income generation and efficiencies within service review and design.
11. Some of the projects delayed by the pandemic are still live and in time will bring returns to support income generation targets.
12. The Council now owns a substantial commercial property investment portfolio and the specialist team employed to deliver acquisition and asset management is continuing to adjust their focus to concentrate on asset management as the scale of the portfolio has grown towards its target size.
13. District Executive receives regular bi-monthly reports on the financial objectives set out in the Commercial Strategy so this report does not touch upon those aspects. Those reports will continue to 31 March 2023.

Commercial Strategy Update

14. The Commercial Strategy would be due a detailed review if it were not for local government reorganisation, with the Council becoming part of a new Somerset unitary authority on 1 April 2023. Commercial matters form an important part of many of the LGR Programme work-streams and the expertise from South Somerset District Council is supporting that work.
15. In addition, the publication by CIPFA of a revised Prudential Code has made it harder for local authorities to undertake certain types of commercial activity and, more



specifically, invest for income yield by making commercial property investments and/or commercial loans to third parties). Authorities that continue to invest in these assets outside the parameters set out in the Prudential Code will be unable to borrow from the Public Works Loan Board.

16. South Somerset District Council has invested much in its Commercial Strategy and has consistently met its targets, producing net income to support front-line services. The external factors set out in paragraphs 15 and 16 above will constrain what can be achieved during the transition period to 31 March 2023, but it is important to refocus the Strategy to cover that time and prepare for an orderly transition to the new Somerset Council. It would therefore seem sensible to amend the Commercial Strategy as follows:

Objectives – amend the objectives (paragraph 7 above) as follows:

- **Business Services Objective** (3.1) – ~~if the opportunity arises either in the context of preparation for LGR or out of business as usual~~, each and every business service will look to enhance its yield by 5% p.a. ~~commencing from 2017/8~~ by reviewing fees, charges, processes ~~and the cost of delivering services and potential to deliver new added value services~~
- **Income Generation Objectives** (3.2) - ~~to progress~~ maintain the existing investment property ~~proposals~~ ~~portfolio~~, that offer a target ~~a~~ 7% ~~gross~~ return on investment across the ~~investment term adopted~~ ~~portfolio~~ and/or provide ~~preserve~~ a consistent balance ~~to the overall investment portfolio~~ in terms of security, liquidity and spread
- ~~**Other Corporate Plan Objectives and Social Value** (3.3) – projects that do not meet income generation criteria but provide some financial return and bring collective benefit to the community in accordance with Corporate Plan objectives will be considered under the appropriate strategy/policy. They will have a different form of assessment criteria and their primary objective may be to deliver a service of community benefit rather than income~~

The final objective is recommended for deletion as there are unlikely to be any new projects coming forward under this objective before vesting day.

Delivery – continue to measure delivery as before, but with a pragmatic and common-sense approach to any implications or constraints arising from the transition to a new authority (paragraph 8 above)

Targets – to amend the targets (paragraph 9 above) as follows, bearing in mind the likely impact of the LRG transition period on business as usual:

- to maintain the Commercial Property, Land and Development Team and deliver income from Housing, Energy, Property, Land and Development ~~in accordance with the budget and plans agreed by Council on 28 February 2022.~~
- ~~to complete the first investment and commercial programmes delivering a minimum of £2.0m per annum of revenue from property investment and £500k per annum of revenue from commercial services and other service income by year end 2019/20.~~



- to deliver a minimum of £1.35m per annum of revenue by 2021/22 via the additional capital investment of £75m as outlined in the Financial Strategy and commercial activity and/or existing asset management, be that renewables, commercial or residential property investment, regeneration or development, with a target average of 7% **gross** return on investment across all new commercial investment proposals. This will equate to a lower net revenue of 2.5% to 3%, or more, available to the council after accounting and financing provisions.
- **to update the Council's procedures for prudent commercial investment portfolio management**
- to deliver an additional £150k per annum of revenue from commercial services and other service income by year end 2021/22.
- to deliver **update** the Property Project review recommendations for existing assets including potential for disposal, for investment in change of use and retention or letting of existing assets **as required for LGR Programme purposes** by 2021.
- to review all fees and charges and look to increase them in line with inflation annually, or where more appropriate every four years, in order to maintain 'true value' and cost effective fees and charges **as required for LGR Programme purposes**.
- to deliver a 5% per annum improvement in yield collectively across all internal services.

Financial Implications

There are no financial implications arising from this report.

Legal implications (if any) and details of Statutory Powers

There are no legal implications arising from this report.

Council Plan Implications

These changes are intended to ensure the achievements under the previous Council Plan are maintained.

Carbon Emissions and Climate Change Implications

There are no carbon emissions and climate change implications arising from this report, but the positive impact of many of the projects carried out under the Other Corporate Plan Objectives and Social Value objective, such as the Electric Vehicle charger network and the council building decarbonisation programmes has had a positive impact (see paragraph 10).

Equality and Diversity Implications

There are no equality and diversity implications arising from this report.



Privacy Impact Assessment

There are no privacy implications arising from this report.

Background Papers

The Commercial Services and Income Generation Commercial Strategy: 2017-2021 August 2019 Update (see Appendix)

Appendix

Commercial Services and Income Generation Commercial Strategy: 2017-2021

| | |
|-----------------|--|
| Version Details | |
| Programme: | SSDC Commercialism |
| Version: | Final – August 2019 Interim Update |
| Author: | Director for Commercial Services and Income Generation |
| Date: | October 2020 |

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1 Commercial Strategy Overview

SSDC recognises that we exist in a rapidly changing world and are working in a challenging financial environment, which is forecast to become even more demanding in the coming years. We want to meet these challenges and exceed them, survive and thrive in this environment, become a leading Council that is financially self-sufficient. This is with the aim of delivering high quality services to our customers and communities, being able to deal with the challenges the district faces and invest in improving quality of life for residents.

To do this, it is accepted that we need to change our culture, thinking, and ways of working, and embrace and deliver commercialism throughout the Council at every level. Over the next pages, the Commercial Strategy will focus on outlining our aims and objectives, how we will achieve them and know that we have been successful. This will be presented as follows:

- The commercial strategic aims describe what we are going to do to support the overall Council objectives and strategy as set out in the Council plan and related documents.
- The rationale explains why this is important and the current context.
- The objectives explain what we will need to do or put in place to achieve our strategic aims
- The measures describe how we will evaluate our success

1.1 Commercial Strategic Aims

| | | |
|--|---|---|
| | Updating and improving systems and governance | |
| Embedding commercial thinking throughout the whole organisation and each project cycle | Being more commercial, business like and generating income whilst remaining focussed on our core purpose - to support and deliver for our communities | Build strong partnerships & collaborative ways of working |
| Developing innovation, income generation, growth and trading opportunities | | Improving commercial leadership, awareness and competency at all levels |
| | Inspiring a commercial culture across the Council, the wider public sector and partnerships | |

1.2 Rationale - Why do we need a Commercial Strategy?

- 1.2.1 All public sector organisations currently find themselves in an extremely challenging environment, with mounting financial pressure, reduced resources, growing demand and greater market competition for services.
- 1.2.2 South Somerset District Council (SSDC) financial strategy recognises the growing gap between core funding and costs of service. The Financial Strategy in 2017 projected a Budget Gap rising



to £5.2m by 2022/23, and set a savings target rising to £6m per year by 2022/23 building in a contingency for new financial pressures and opportunity to support new priorities. There is significant uncertainty beyond 2020 due to factors beyond our control, and we need to plan to be more self-sufficient and much less reliant on Government grants. The Transformation programme will make us more modern and efficient and is due to be fully implemented before the end of 2019, delivering £2.5m of the £6m needed. The remainder of the revenue shortfall must be found through commercialism and income generation if we are to avoid cutting services and if we are going to be able to invest in council priorities such as the regeneration of our towns and the development of our economy.

- 1.2.3 There will inevitably be uncertainties in future Government funding through the Spending Review 2019, Fair Funding Review, Business Rate Retention reform, and review of New Homes Bonus. We also face increasing demands on costs of services, including housing. These are some of the reasons for the financial shortfall which is anticipated to increase in the future.
- 1.2.4 The Financial Strategy and MTFP have been reviewed in August 2019, with £5.5m of the £6m savings target built into the Medium Term Financial Plan. The £5.5m includes £2m net income per year from commercial property investment. Despite strong progress towards the savings target set in 2017, reductions in expected funding through business rates and new homes bonus has hardened the residual Budget Gap with a new savings target of £2m (on top of the £5.5m built into base budget) required by 2022/23.
- 1.2.5 SSDC recognises this ongoing need and the requirement to take a more commercial approach to be self-sufficient financially and ensure that services are not adversely affected, so that we are 'future-proofed' and thriving into the future.

1.3 How do we achieve Council objectives through our Commercial Strategy?

- 1.3.1 For SSDC commercialism means the ability to think and act more business-like when considering the ways we manage, operate, deliver and resource our services and products in order to deliver best value for communities and customers. Commercialism does not mean just making a profit for profit sake. It includes:
 - Considering the whole life cost of policy decisions, including market impact and benefits realisation.
 - Improving efficiency of service delivery – reducing costs and streamlining processes
 - Maximising value for money from contractual relationships
 - Making robust decisions on a consistent basis with evidence and a sound business case
 - Considering new and innovative ways of generating income
 - Taking an investment based approach to the use of financial resources including assessing the return from the investment in terms of financial return, delivery of the council's priorities and added value to our communities
- 1.3.2 This means making sound and clear decisions in using our resources, investing public funds to become more efficient and generate income for the Council to deliver better services whilst



retaining a clear focus on our communities. This will affect different parts of the Council in different ways and to varying degrees, as some services will never be fully commercial.

- 1.3.3 However, commercial principles can be applied to most operations and must be considered when reviewing all policy objectives and direction. It will involve physical, technical and cultural change with strong and effective leadership and management at all levels and throughout the organisation.
- 1.3.4 To achieve these requirements we will need to work to a clear Commercial Strategy and deliver its objectives on time and on target.
- 1.3.5 We need to understand that embracing a more commercial culture, in both our thinking and actions will be of paramount importance to help us deliver revenue and high quality services, effectively and efficiently.
- 1.3.6 We will need to be ambitious and innovative in our thinking to invest to earn and save additional, secure and long term revenue streams in order to support the Council priorities and service delivery objectives. By adopting this mind-set and achieving in all of these areas we will ultimately be in a better position to meet the wider Council objectives.

1.4 What is the outcome?

- 1.4.1 Revenue shortfalls will be met, with the contribution from the commercial investment portfolio net income target of £3.35m per annum income by the end of 2021/22 (compared to the £2.25m target in 2017/18). The Council's overall savings target is increased to £7.5m per year by 2023/24 (compared to the £6m target in 2017/18). With £5.5m already built in as 'delivered' the Council needs to ensure these savings are sustained and now deliver a further £2m to meet the overall updated forecast Budget Gap of £7.5m. The Financial Strategy Report (September 2019) provides further detail on the savings delivered and still required.
- 1.4.2 The latest Financial Strategy also recognises that market prices and returns have changed since the Commercial Strategy was first prepared in Q2 2017. The combined impact of the expectation of additional savings being needed and changed market conditions leads to the Financial Strategy proposing an increase in the investment fund.
- 1.4.3 However, commercialism work will evolve and continue into the future to meet or exceed ongoing revenue targets wherever possible.
- 1.4.4 In summary SSDC will continue to grow its revenue through commercial, ambitious and innovative investment, development, trading of its more commercial services as viable business plans are developed and cost reduction of its services.
- 1.4.5 By delivering the Commercial Strategy which aligns with and supports the Council Plan and complements other corporate strategies such as Finance and Information Technology SSDC will:
 - develop into a more cohesive and ambitious, economically efficient organisation



- become a partner of choice for the community and commercial sectors by demonstrating its commercial awareness and effective delivery of services, partially through commercially traded services
- be a desirable and respected employer that invests in its staff and attracts the next generation
- become a leader in its field, delivering high quality, efficient, effective and timely services to its communities and customers.

In delivering the Commercial Strategy SSDC will also contribute to achieving its Vision:

Copy of “One Team” vision with four themes:

Great to work for
Leading the way
Excellent to work with
Delivering for our communities

Section 2 Commercial Approach to Income Generation

2.1 Commercial Approach - Our Core Principles and Methodology

- 2.1.1 This strategy applies whenever we spend money with external suppliers, enter into or manage our commercial arrangements, invest in assets or services that generate income or we make a commercial decision. Whilst the Commercial Services teams will lead on delivery, they will also work in partnership, forming relevant communities of practice for each project or service area across the organisation and externally with partners and customers.
- 2.1.2 However, we recognise that not all services can ‘trade’ or charge for what they do for customers to generate a direct income, but to some degree commercial strategy principles could still apply; we can demonstrate that other services can be more innovative but believe that in the past they have never been encouraged or enabled to do so in a commercial manner prior to this strategy implementation.
- 2.1.3 SSDC will adopt a commercial approach across the organisation, which allows everybody to share their ideas through the WeShape Programme encouraging staff and members to put forward their ideas and by working with the Income and Opportunities Development Manager who will drive relevant Communities of Practice (CoP)¹ appropriate to the service involved to help develop viable ideas and deliver commercial outcomes. This will allow avenues for all ideas within internal business services and with external partners and customers to the Council to be evaluated swiftly, using a robust early assessment criteria model and fully costed business case approach. In this way we can take forward the right projects, measure efficiencies, deadlines and income, through to delivering the final project. Any project taken forward will involve member input and oversight, through the relevant portfolio holder to the service it involves; or their nominated deputy for a particular project.

¹ CoP – a group of people with the relevant skill or experience brought together to drive and deliver a specific piece of work or project

- 2.1.4 We have enterprising staff, partners and members, their skills and ideas need to be clearly and effectively communicated and harnessed to help achieve our commercial strategy. We will invest in our staff training to enhance staff skills and raise the level of commercial expertise across the Council; which we see as an investment and of value to our organisation not a cost. Commercialisation training has commenced and will continue to be rolled out across the organisation, as well as to members and our partner councils that request it; supporting their development, shared working practices and services wherever possible.
- 2.1.5 Stakeholders, staff and customers will feel engaged and valued in our new commercial and innovative approach, realistic targets and projects will be agreed having engaged with them to obtain views, inputs and buy-in. Regular headline summary updates on commercial investments, achievements and service yield improvements will be reported back to Full Council quarterly, as part of the Corporate Performance Report, as baseline data becomes available to develop and add to performance monitoring.
- 2.1.6 We accept that the Council will need to take more and different risk than in recent times in order to achieve its ambitions and commercial success. This risk should be balanced with an efficient and proportional regard to governance, policy, management, processes and systems to ensure robust decision-making, performance and success of new commercial enterprises, contracts and partnerships. All of which will continue to evolve and be refined over time to ensure that the Council adheres to its statutory responsibilities and that public money continues to be appropriately invested, used and accounted for.

Section 3 Organisation Wide Objectives for 2017 – 2021

3.1 Business Services Objective

- 3.1.1 Each and every business service will look to enhance its yield by 5% p.a. commencing from 2017/8 by reviewing fees, charges, processes, the cost of delivering services and potential to deliver new added value services.
- 3.1.2 This will be done in conjunction with the Commercial Services, Income & Opportunities Development Manager and relevant CoP, working with each service as a 'critical friend' to achieve a common goal. They will assist the internal business services and offer advice and specialist experience to draw upon in order take the best innovative ideas forward to improve service yields by 5% per annum across the organisation, with a comprehensive proposal and business plan for approval and implementation

3.2 Income Generation Objectives, Process and Governance

- 3.2.1 Commercial Investments in property and renewable energy need to be dealt with swiftly and confidentially if local authorities are to compete within the commercial marketplace. Therefore, a schedule of delegation has been approved to enable positive decisions to be made that respect market requirements for swift action and confidentiality.



- 3.2.2 Stage 1 of our process, with any proposed investment, is for an early analysis and assessment to be completed by property and finance specialists, with external advice as necessary, to develop the business case for the **Investment Assessment Group (IAG)** to consider at stage 2. Most opportunities will not pass Stage 1; if not in accordance with the basic requirements of this strategy they will not proceed to stage 2.
- 3.2.3 The IAG, comprising the relevant Portfolio Holder for Income Generation (currently Economic Development and Commercial Strategy), S151 Officer, Monitoring Officer, Director for Commercial Services and Income Generation and the Commercial Property Land and Development Manager provide a Stage 2 governance panel to consider and debate new investment proposals, including external investment proposals and partnership working. Each opportunity is assessed against a range of investment and risk criteria and requires unanimous support of all IAG members before a recommendation is made to the Chief Executive in consultation with the Council Leader to approve, Stage 3. In turn they will have the option to approve, refuse or refer the investment proposal to District Executive for a final decision. The recommendation to approve may contain a bidding range that officers can work within, accepting that non material matters may need to be addressed during negotiations. This is accepted normal commercial activity to complete a transaction.
- 3.2.4 However, any material changes to the original recommendation during due diligence and negotiations post approval will be referred back to the IAG if necessary and a further recommendation made to Chief Executive in consultation with Council Leader. Examples of a material change could include matters such as discovering a heavily contaminated site devaluing the investment or restricting its future development; or the financial status of the tenant in situ suddenly diminishing prior to completion of the transaction.
- 3.2.5 Each member of the IAG will have a nominated deputy, in case of absence or conflict of interest arising for any specific investment proposal. The deputies will comprise Portfolio Holder for Finance, Deputy S151 Officer, Deputy Monitoring Officer, Director for either Strategy & Commissioning or Service Delivery, and a Commercial Property Investment Project Manager.
- 3.2.6 These investment proposals will be measured against agreed assessment criteria, in order to ensure they meet the required returns/objectives and so that investment of public money is applied with proportionate and efficient regard to procurement and governance procedures. The IAG and Chief Executive have agreed delegated authority limits for individual transactions and are empowered to make decisions to proceed within these parameters and to report these to DX and Council in due course. This includes the setting up of an appropriate vehicle, such as a company Special Purpose Vehicle (SPV) or Joint Venture if the investment proposal involves the trading of services in order to generate income. Wherever appropriate, this will be undertaken fully prior to the final decision making processes or approval given subject to named conditions to be met, to ensure that only valid projects with real merit are taken forward. Where potential investments exceed delegated limits they will be considered through District Executive and if appropriate, Full Council.
- 3.2.7 The headline financial objective is to progress investment property proposals that offer a target 7% return on investment across the investment term adopted, and/or provide a



consistent balance to the overall investment portfolio in terms of security, liquidity and spread. In some cases investments will achieve a higher return on investment and in others less, in order that balance within the portfolio and spread of risk is achieved and an average return is maintained at the target rate of 7%. All projects will be in accordance with reviewed and updated procurement and governance procedures. These will be regularly reviewed, updated and refined in order to ensure flexibility with operational needs, so that a proportionate and efficient reliance can be applied in their use. In any event individual transactions should not be accepted below a 6% return on investment or minimum net revenue returns will not be able to be achieved across the portfolio.

There is no 3.2.8

- 3.2.9 An exception to this may be where there is an opportunity to purchase an investment in order to then sell part off to release capital receipts and raise remaining returns to 6%+. For example, a long leasehold industrial estate let for 125 years with multiple units may provide a very secure, long term income to the portfolio helping to balance risk, but initially may only achieve say 4% yield. However, an opportunity to achieve break-up value and recover some initial capital may then increase the remaining returns to an acceptable level of over 6% return on investment enabling IAG to recommend approval. This would be acceptable as considered an estate management opportunity. This strategy for the purchase would need to be made clear in the IAG report prior to a recommendation.
- 3.2.10 Since the preparation of the first Commercial Strategy in Q2 2017 the commercial property market has seen significant increases in typical prices with consequent reduction in the levels of return on investment that properties deliver. As an example, the industrial property investment sector has seen prices rise over this period to produce a fall in the rate return greater than 0.5%. Thus a property that would have delivered a rate of return of 7% if sold at Q2 2017 would now command a higher price delivering a rate of return below 6.5% as at Q2 2019.
- 3.2.11 Our first Commercial Strategy identified a target yield of 7%, which we have been able to achieve. However, because of the demand for income much of the stock that we have been able to afford has shorter unexpired lease terms than we might have expected at the outset. Consequently, assuming a worst case scenario wherein all tenants vacate at the earliest possible opportunity, the annual yield until 2028 at present averages 6.46% due to the allowance for periods of reduced income whilst properties are re-let.
- 3.2.12 As a Local Authority investor, we need to recognise that we meet a number of other financial commitments from the rental income of our property investments, prior to reporting the net revenue return of that income to the council. These include interest costs on borrowing, MRP which is provision for repaying borrowing, sinking fund for future costs and income volatility risk arising and management costs. The net revenue position subsequently reported gives the residual amount of available revenue to the council each year, after all of the required monetary provisions have been made and are retained within the council for their required purpose. This net position is reflected in the financial strategy savings targets.

- 3.2.13 Not all investments and assets remain fit for purpose indefinitely. Therefore, it is also prudent to consider the disposal of assets, as part of normal estate management practice. Disposal follows a similar governance procedure to the IAG, through the **Disposals Assessment Group (DAG)** comprising the same members as above. However, DAG has different limited delegated authority to consider assets up to varying values for investments and operational assets. The DAG needs to have consulted in advance with relevant members, as well as considered relevant assessment criteria, prior to making a recommendation with a majority group agreement. Full details are available under the Disposals and Community Asset Transfers policy.
- 3.2.14 The fund invested in new property and renewable energy assets together with the capital invested in existing commercial investment property assets will generally be managed as a revolving fund enabling capital released via asset disposals to be retained within the fund for reinvestment. This is expected to ultimately contribute to growth in the capital within the fund.

3.3 Other Corporate Plan Objectives and Social Value

- 3.3.1 Other projects that do not meet income generation criteria, but do provide some financial return and also bring collective benefit to the community in accordance with our wider Corporate Plan objectives, will be considered under other appropriate strategy and policy. They will have a different form of assessment criteria and their primary objective may be to deliver a service of community benefit, over income i.e. regeneration, economic development, housing need etc. Each project will set its own terms of reference and objectives. E.g. a leisure project may meet a wider corporate objective, cover its costs by generating a return to repay the funding for its development, but will not meet the primary objectives of the Commercial Strategy

Section 4 Specific Property, Land and Development Objectives

4.1 Overview

- 4.1.1 In order to become an enterprising and commercially focused Council which achieves its vision, SSDC will need to make effective use and invest in its skills, existing land and property assets, as well as look to invest in development and regeneration of infrastructure, land, housing, commercial property and renewable energy sources.
- 4.1.2 By investing in schemes and projects that improve productivity and reduce costs the Council will generate extra revenue. Generating significant levels of new income for the Council will help it to become financially sustainable for the future. Delivering these objectives will help to shape and improve public services and enable economic growth across the District. These assets and attributes will be applied to redefine and redesign how we work, where we work, who we work with and influence how we take investment decisions forward.

4.2 Commercial Services and Income Generation Directorate

- 4.2.1 Investment in resource and skills to deliver - In redefining and redesigning how we work and who we work with, investment in a new role for Director of Commercial Services and Income Generation has already been appointed. This Director oversees additional resource of a Commercial Property, Land and Development Manager and associated team comprising both in-house and specialist external resource where required.
- 4.2.2 The in house team was appointed over 2018, with external elements being recruited as and when required. The remainder of this Directorate aligns with the Transformation programme and comprises existing commercial services.
- 4.2.3 There is also a Commercial Directorate role recruited to assist with the Income Generation objective. This role has been recruited on a 'self-funding' basis for new business and income generation. The Income & Opportunities Development Manager is tasked with overseeing and managing existing business units and developing them into more efficient, commercially minded services and where appropriate independent profit centres (such as the Yeovil Innovation Centre or arms-length trading companies); investigating new business and income opportunities, partly through leading on the new proposed WeShape programme; and taking these projects forward to fruition.
- 4.2.4 Both Transformation and Commercial Services & Income Generation will be pivotal in delivering the overall initial income targets. (See proposed estimated breakdown at 1.4).

4.3 Defined Areas of Commercial Investment & Income Generation

- 4.3.1 Investment in New and Existing Commercial Property and Land Assets - Invest to Earn – Process and Performance Reporting In order to reach our annual income targets, immediate investment in income producing assets achieving a target return on investment of 7% (or more) across our land, commercial and housing investment portfolio, forms part of this strategy. In considering such opportunities, a predetermined set of assessment criteria and summary business case report for each proposed investment project will be used, supported by additional due diligence or business planning where appropriate prior to completing each case to ensure transparency, due diligence, governance and consistency to aid achievement of our objectives.
- 4.3.2 The governance and decision making process is outlined at 3.2 above and will reflect the specific circumstances of each case. There will also be regular performance monitoring to demonstrate how the investments are performing over time, and to enable portfolio review to take place to maximise benefit over time. Detailed reporting to the District Executive every 6 months specifically on our assets and new investments will be undertaken to ensure transparency and information is provided to demonstrate how well the Commercial Strategy is performing. Further general financial reporting will be provided through usual budget monitoring and budget setting processes.
- 4.3.3 Existing Commercial and Operational Asset Management - Invest to Save The Council already owns a significant number of valuable property and land assets from which commercial value can be derived. The Property Project Review June 2017 by David Lock Associates (confidential



report) makes a number of recommendations which will inform the agreed way forward and objectives for the coming years to contribute towards income generation.

- 4.3.4 The headline recommendations are to retain, invest in, regenerate and consider disposal of a number of these assets. Action will be taken in line with these recommendations when approved.
- 4.3.5 The overarching principle for existing assets will be that unless they either contribute positively to a policy objective, and represent value for money compared to other ways in which the same benefit could be achieved, or provide an adequate financial return on investment, they should be considered for disposal.
- 4.3.6 The overall aim is to move to a balanced, more financially beneficial, well managed estate that includes a performing investment portfolio in line with agreed criteria.
- 4.3.7 Renewable Energy Schemes - Invest to Save and Invest to Earn A number of renewable energy measures and projects will be investigated to manage our existing and future energy costs and requirements on our own operational property, as well as opportunities for investment purely for income generation. A valid business case in line with assessment criteria will need to be met and also considered within the overall asset portfolio in order to ensure correct governance and a balanced investment and income portfolio is maintained, having regard to investment risk in new technology, in terms of security, liquidity and yield in financial terms.
- 4.3.8 Housing Development, Sale and Retention - Invest to Earn and Corporate Objective By the end of financial year 2019/20 the Council will investigate the benefits of the best vehicle or vehicles to take forward investing in housing land and mixed use development projects including Wholly Owned Companies, Joint Venture and Commercial Partnerships. It will source expert advice in Company set up, trading ventures and VAT implications to ensure that it then creates the most commercially appropriate vehicle for the range of projects it progresses. It will develop in house skills and partnership working to ensure that projects taken forward are suitably resourced to deliver the project objectives.
- 4.3.9 In developing Housing the initial objective is to provide Market Housing to help deliver the market needs and sell the completed units to recover development costs and make a set capital receipt benchmark of no less than 10% Profit on Cost. Once this has been achieved any remaining units still available may be considered for Market and Affordable Rent dependent on both housing need in that location and achieving the running target yield of 7% across the investment portfolio. These units will be retained by the Council for long-term income production and capital value growth. Each housing development case will need to be assessed on its own merits and need in terms of the split required between sale and/or whether to hold any units for rental.
- 4.3.10 A further potential benefit that will be sought is to partner with developers on schemes with the intention that any direct investment made by SSDC is matched by the developer, thus using SSDC's involvement and cash flow to kick start the delivery of more units to the market in a shorter timescale. When possible these developments will be within the district and given priority, but it is recognised that this is market opportunity and viability driven and will not



always be possible. However, the benefit will ultimately return to the Council through additional financial resources to invest in service delivery and other local priorities e.g. Regeneration schemes.

- 4.3.11 The Council's exposure to the housing market will be monitored over time as part of its overall investment portfolio, so that the impact of changes in market conditions can be considered.
- 4.3.12 Regeneration Major Regeneration Schemes –SSDC already has a number of major regeneration schemes planned, such as the Chard Regeneration Scheme, Yeovil Refresh and the Wincanton Town Centre Regeneration, and these are projects with their own strategies and plans for delivery, but they link to the Commercial Strategy objectives in the longer term and the same principles apply in executing these projects.
- 4.3.13 Other Strategic Regeneration - there are also a number of smaller and more local schemes targeted at specific needs such as the Yeovil Crematorium Refurbishment and Extension and Delivering Employment Land across the District, which are both current projects and ongoing longer term projects.
- 4.3.14 Regeneration usually takes a longer time until it is income producing than direct income generation investment. It often requires more resource, capital or grant funding in the early stages and usually relies on partnership working with third parties. However, regeneration schemes and projects do also meet other SSDC Corporate Objectives, such as economic development, housing, jobs and infrastructure.
- 4.3.15 Regeneration delivers both tangible commercial and community objectives resulting in income generation for the wider district in the medium to long-term, as well as directly to the Council through business rates or council tax, for example.
- 4.3.16 Therefore our Commercial Strategy is just as applicable to regeneration proposals, as it is for income generation. The main variance is the timescale for income delivery. Therefore, the council has set up a Strategic Regeneration Board which oversees the approved specific regeneration projects and will continue to progress, consider and assess Regeneration proposals over the life of this Commercial Strategy, using an investment based approach that seeks to create viable regeneration schemes that not only pay for themselves but generate a return on the investment over the longer term. As a result, these will become the income generation deliverables for the future SSDC Commercial Strategies. If SSDC is to adopt commercialism in its thinking and actions the Commercial Strategy cannot apply only until 2021 but must look to continually generate income for the future.
- 4.3.17 Liquid Assets - Invest to Earn SSDC have cash reserves that will be reviewed continually under Finance and Treasury Management policies, to ensure that the best yields and returns are achieved whilst maintaining, suitable levels of security and liquidity to ensure a balanced portfolio for the organisation both ensuring the smooth running and maximising returns wherever possible.
- 4.3.18 The Council also has access to low cost borrowing. As part of the commercial strategy the Finance department will review each proposal for investment and income generation



prospects to ensure that proposals which meet our investment criteria are progressed. This will be undertaken through keen commercial management and consideration of all financial vehicles available to us. These may include short term low cost borrowing from other organisations, borrowing from the Public Works Loan Board, or investing cash reserves into income generating financial products for the best returns over the short and longer term.

4.4 Summary

4.4.1 Directors will oversee all commercial business activities ensuring that they are appropriately governed, scrutinised, managed and monitored. Managers and officers throughout the organisation will also be empowered and responsible to consider and progress proposals such as:

- Capital receipts generated from asset sales
- Asset retention and enhancement
- Borrowing proposals, internal and external
- Capital spending decisions
- External lending decisions
- Income generation proposals and trading opportunities

4.4.2 Ultimately, all investment decisions will be made having applied a robust business case or evaluated against agreed key assessment criteria prior to progressing.

4.4.3 A set of financial and non-financial criteria will be used to assess which schemes and projects progress.

4.4.4 Final decisions for larger investments and income generating proposals will be taken by the appropriate officers and members under the reviewed and pre-agreed governance and procurement procedures.

5 How will we know that we have been successful?

5.1 Commercial Objectives will be measured overall by the level of additional income generated, but also in a number of other ways, for example;

- Embed a commercial culture across the organisation through developing and upskilling our staff to empower them to be more commercially aware, enterprising and innovative.
- An increase in commercial activity demonstrated by the level of additional income being achieved, such as an increase in total contribution to fixed costs and overheads (by %) and contribution to staff costs (by %).
- Reducing the net budget of a service by reducing variable costs of that service.
- Additional investment income will be measured and monitored in terms of increase in turnover, profit and return on investment, as appropriate
- Income targets will be agreed with and set for teams that can/are charging for services and efficiency targets agreed with and set for all teams.

5.2 Ongoing refinement of individual commercial objectives

5.2.1 The refined and detailed commercial objectives within each commercial business service are agreed and will be reviewed and updated annually to reflect projects implemented and new objectives to be achieved over the next years. Other services will adopt a similar approach as and when business plans can be developed with commercial objectives. These will be linked to and complement our corporate, financial, capital and treasury management strategies. In the meantime, the following overarching targets are proposed and may be defined further during the life of this strategy.

- To maintain the Commercial Property, Land and Development Team, delivering new income from Housing, Energy, Property, Land and Development.
- To complete the first investment and commercial programmes delivering a minimum of £2.0m per annum of revenue from property investment and £500k per annum of revenue from commercial services and other service income by year end 2019/20.
- To deliver a minimum of £1.35m per annum of revenue by 2021/22 via the additional capital investment of £75m as outlined in the Financial Strategy and commercial activity and/or existing asset management, be that renewables, commercial or residential property investment, regeneration or development, with a target average of 7% return on investment across all new commercial investment proposals. This will equate to a lower net revenue of 2.5% to 3%, or more, available to the council after accounting and financing provisions.
- To deliver an additional £150k per annum of revenue from commercial services and other service income by year end 2021/22.
- To deliver the Property Project review recommendations for existing assets including potential for disposal, for investment in change of use and retention or letting of existing assets by 2021.
- To review all fees and charges and look to increase them in line with inflation annually, or where more appropriate every four years, in order to maintain 'true value' and cost effective fees and charges.
- To deliver a 5% per annum improvement in yield collectively across all internal services.

Proposed Update to the Audit Committee Terms of Reference

| | |
|---------------------|---|
| Portfolio Holder: | Peter Seib, Finance and Legal Services |
| SLT Lead Officer: | Karen Watling, Chief Finance Officer & S151 Officer |
| Section 151 Officer | Karen Watling, Chief Finance Officer & S151 Officer |
| Lead Officer: | Alastair Woodland, South West Audit Partnership |
| Contact Details: | Alastair.woodland@SWAPaudit.co.uk |

Purpose of the Report

1. To approve the proposed updated Audit Committee Terms of Reference (Appendix A) produced by the Audit Committee Terms of Reference Working Group.

Public Interest

2. Audit Committees are a key component of corporate governance and an important source of assurance about an organisation's arrangements for managing risk, maintaining an effective control environment, and reporting on financial and other performance.
3. It is good practice to periodically review the remit and working practices of the Audit Committee to ensure they are in line with any updated national guidance and/or legislative changes and therefore remaining fit for purpose.
4. This report updates Members on the Member/Officer Work Group that was created following the May 2021 Audit Committee to review the Audit Committee's existing Terms of Reference (ToRs) in line with the guidance contained in the CIPFA (Chartered Institute of Public Finance and Accountancy) publication entitled "Audit Committees; Practical Guidance for Local Authorities and Police" (2018 edition).
5. The working group will also review any changes that may be needed arising from MHCLG's (Ministry of Housing, Communities & Local Government) response to Sir Tony Redmond's "Independent review into the oversight of local audit and the transparency of local authority financial reporting".

Recommendations

6. That Council:-
 - a. Approve the proposed Audit Committee Terms of Reference at Appendix A.
 - b. Authorise the Monitoring Officer to make the necessary amendments to the Council's Constitution

Background



7. There have been a number of significant developments in local authority governance and audit practices over the last 8 years. This includes “Delivering Good Governance in Local Government: Framework” (CIPFA/Solace 2016), development and updates to the Public Sector Internal Audit Standards (PSIAS), and the introduction of the Code of Practice on Managing the Risk of Fraud and Corruption (CIPFA, 2014) and the Local Audit and Accountability Act 2014.
8. CIPFA defines the purpose of an audit committee as being to provide those charged with governance an independent assurance on the adequacy of the risk management framework, the internal control environment and the integrity of financial reporting and annual governance processes. By doing this, the committee brings an important source of assurance to the Council's arrangements for managing risk, maintaining an effective control environment, and reporting on financial and other performance matters.
9. The Audit Committee satisfies the wider requirement for sound financial management, as set out in the Accounts and Audit Regulations, ‘for ensuring that the financial management of the body is adequate and effective and that the body has a sound system of internal control which facilitates the effective exercise of that body's functions and which include the arrangements for the management of risk.’ In addition, Section 151 of the Local Government Act 1972 requires the authority to, ‘make arrangements for the proper administration of its financial affairs’. In discharging sound financial management, the Section 151 Officer requires an effective audit committee and an internal audit service which evaluates the effectiveness of its risk management, control and governance processes. Both elements are enshrined in the Public Sector Internal Audit Standards (PSIAS) and the supporting Local Government Application Note (LGAN).
10. Effective audit committees bring many benefits to the Council. They can:
 - Increase public confidence in the objectivity and fairness of financial and other reporting;
 - Reduce the risk of illegal or improper acts;
 - Reinforce the importance and independence of internal and external audit and any other review processes that report to the Committee;
 - Provide a sharper focus on financial reporting, both during the year and at year end, leading to increased confidence in the objectivity and fairness of financial reporting;
 - Assist the co-ordination of sources of assurance and, in so doing, make management more accountable;
 - Provide additional assurance through a process of independent and objective review;
 - Raise awareness of the need for internal control and the implementation of audit recommendations.
11. It is therefore important that the Terms of Reference are reviewed periodically to ensure relevant matters of governance, risk management and internal control are incorporated into the scope of the Audit Committee.



Financial Implications

12. The Accounts and Audit Regulations 2015 state that the Council must ensure that it has a sound system of internal control which facilitates the effective exercise of its functions and the achievement of its aims and objectives; ensures that the financial and operational management of the authority is effective and includes effective arrangements for the management of risk.
13. Furthermore, Section 151 of the Local Government Act 1972 requires the Council “to make arrangements for the proper administration of its financial affairs”.
14. The Section 151 Officer role is key to discharging the requirement for sound financial management at the Council. To be truly effective, the role requires an effective Audit and Governance Committee to receive assurances on the effectiveness of the Council’s arrangements and provide support and challenge. There are no direct financial costs associated with this paper.

Council Plan Implications

15. The proposals in this report contribute to SSDC’s vision of being open and transparent and actively communicating, engaging and listening to feedback.

Carbon Emissions and Climate Change Implications

16. There are no implications arising from agreeing this report.

Equality and Diversity Implications

17. There are no implications arising from agreeing this report.

Background Papers

- [CIPFA \(Chartered Institute of Public Finance and Accountancy\) “Audit Committees; Practical Guidance for Local Authorities and Police” \(2018 edition\).](#)
- [MHCLG’s “Local authority financial reporting and external audit: government response to the Redmond review” \(December 2020\)](#)
- [Review of Audit Committee’s Terms of Reference Agenda Item 11 May 2021 Audit Committee](#)
- [Update on Audit Committee’s Terms of Reference from the Work Group Agenda Item 8 30 September 2021](#)
- [Existing Audit Committee Terms of Reference – Constitution](#)

Appendix A – Proposed Audit Committee Terms of Reference

Statement of purpose

Our audit committee is a key component of South Somerset District Council's corporate governance. It provides an independent and high-level focus on the audit, assurance and reporting arrangements that underpin good governance and financial standards.

The purpose of our audit committee is to provide independent assurance to the members of the adequacy of the risk management framework and the internal control environment. It provides independent review of South Somerset District Council's governance, risk management and control frameworks and oversees the financial reporting and annual governance processes. It oversees internal audit and external audit, helping to ensure efficient and effective assurance arrangements are in place.

1. Governance, risk and control

- 1.1 To review the council's corporate governance arrangements against the good governance framework, including the ethical framework and consider the local code of governance.
- 1.2 To review the AGS prior to approval and consider whether it properly reflects the risk environment and supporting assurances, taking into account internal audit's opinion on the overall adequacy and effectiveness of the council's framework of governance, risk management and control.
- 1.3 To consider the council's arrangements to secure value for money and review assurances and assessments on the effectiveness of these arrangements.
- 1.4 To consider the council's framework of assurance and ensure that it adequately addresses the risks and priorities of the council.
- 1.5 To monitor the effective development and operation of risk management in the council.
- 1.6 To monitor progress in addressing risk-related issues reported to the committee.
- 1.7 To consider reports on the effectiveness of internal controls and monitor the implementation of agreed actions.
- 1.8 To review the assessment of fraud risks and potential harm to the council from fraud and corruption.
- 1.9 To monitor the counter-fraud strategy, actions and resources.
- 1.10 To review the governance and assurance arrangements for significant partnerships or collaborations.

2. Internal audit

- 2.1 To approve the internal audit charter.
- 2.2 To review proposals made in relation to the appointment of external providers of internal audit services and to make recommendations.



- 2.3 To approve the risk-based internal audit plan, including internal audit's resource requirements, the approach to using other sources of assurance and any work required to place reliance upon those other sources.
- 2.4 To approve significant interim changes to the risk-based internal audit plan and resource requirements.
- 2.5 To make appropriate enquiries of both management and the head of internal audit to determine if there are any inappropriate scope or resource limitations.
- 2.6 To consider any impairments to independence or objectivity arising from additional roles or responsibilities outside of internal auditing of the head of internal audit. To approve and periodically review safeguards to limit such impairments.
- 2.7 To consider reports from the head of internal audit on internal audit's performance during the year, including the performance of external providers of internal audit services. These will include:
 - a) updates on the work of internal audit including key findings, issues of concern and action in hand as a result of internal audit work
 - b) regular reports on the results of the QAIP
 - c) reports on instances where the internal audit function does not conform to the PSIAS and LGAN, considering whether the non-conformance is significant enough that it must be included in the AGS.
- 2.8 To consider the head of internal audit's annual report:
 - a) The statement of the level of conformance with the PSIAS and LGAN and the results of the QAIP that support the statement – these will indicate the reliability of the conclusions of internal audit.
 - b) The opinion on the overall adequacy and effectiveness of the council's framework of governance, risk management and control together with the summary of the work supporting the opinion – these will assist the committee in reviewing the AGS.
- 2.9 To consider summaries of specific internal audit reports as requested.
- 2.10 To receive reports outlining the action taken where the head of internal audit has concluded that management has accepted a level of risk that may be unacceptable to the authority or there are concerns about progress with the implementation of agreed actions.
- 2.11 To contribute to the QAIP and in particular, to the external quality assessment of internal audit that takes place at least once every five years.
- 2.12 To consider a report on the effectiveness of internal audit to support the AGS, where required to do so by the Accounts and Audit Regulations (see Appendix A).
- 2.13 To provide free and unfettered access to the audit committee chair for the head of internal audit, including the opportunity for a private meeting with the committee.

3. External audit

- 3.1 To support the independence of external audit through consideration of the external auditor's annual assessment of its independence and review of any issues raised by PSAA or the authority's auditor panel as appropriate.
- 3.2 To consider the external auditor's annual letter, relevant reports and the report to those charged with governance.
- 3.3 To consider specific reports as agreed with the external auditor.
- 3.4 To comment on the scope and depth of external audit work and to ensure it gives value for money.
- 3.5 To commission work from internal and external audit.
- 3.6 To advise and recommend on the effectiveness of relationships between external and internal audit and other inspection agencies or relevant bodies.

4. Financial reporting

- 4.1 To review the annual statement of accounts. Specifically, to consider whether appropriate accounting policies have been followed and whether there are concerns arising from the financial statements or from the audit that need to be brought to the attention of the council.
- 4.2 To consider the external auditor's report to those charged with governance on issues arising from the audit of the accounts.
- 4.3 To review and recommend to Council changes to Financial Procedure Rules and Procurement Procedure Rules.

5. Treasury Management

- 5.1 To provide a scrutiny role in Treasury Management matters including regular monitoring of treasury activity and practices.
- 5.2 The committee will also review and recommend the Annual Treasury Management Strategy Statement and Investment Strategy, MRP Strategy, and Prudential Indicators to Council.

6. Accountability arrangements

- 6.1 To report to those charged with governance on the committee's findings, conclusions and recommendations concerning the adequacy and effectiveness of their governance, risk management and internal control frameworks, financial reporting arrangements, and internal and external audit functions.
- 6.2 To report to full council on a regular basis on the committee's performance in relation to the terms of reference and the effectiveness of the committee in meeting its purpose.
- 6.3 To publish an annual report on the work of the committee.

Report of Executive Decisions

Executive Portfolio Holder: Val Keitch, Leader of Council, Strategy and Housing
Director: Jill Byron, Monitoring Officer
Lead Officer: Angela Cox, Democratic Services Specialist
Contact Details: angela.cox@southsomerset.gov.uk or (01935) 462148

Purpose of the Report

This report is submitted for information and summarises decisions taken by the Chief Executive, Portfolio Holders and District Executive Committee since the last meeting of Council in February 2022.

Members are invited to ask any questions of the Portfolio Holders.

Background Papers

All Published

Appendix A

| Portfolio | Subject | Decision | Taken By | Date |
|--|------------------------------------|---|--------------------|------------|
| Chard Regeneration | Chard Shop Front Design Guide | This report appears elsewhere on the Agenda | District Executive | 03/03/2022 |
| Protecting Core Services | Planning Reimagined | District Executive noted the content of the report, and progress made by the planning service. | District Executive | 03/03/2022 |
| Economic Development and Commercial Services | Investment Asset Management Report | <p>That District Executive:-</p> <ul style="list-style-type: none"> a. noted progress made to date in acquiring new commercial property investments and the asset management following acquisition; b. noted the return being achieved across the portfolio which is in line with the Council's target of 7%; c. noted progress being made in securing income from our existing assets and the contribution to the revenue budget towards the revised £3.35m target; d. noted progress being made in disposals and transfers of existing assets, resulting in a reduction of future liabilities associated with these assets. | District Executive | 03/03/2022 |
| Economic Development and Commercial Services | Review of SSDC Commercial Strategy | <p>This report appears elsewhere on the Agenda</p> <p>.</p> | District Executive | 03/03/2022 |

Motion 1

The following Motion has been submitted by Councillor Mike Stanton:
The Motion is seconded by Councillor Sarah Dyke

House Building Crisis in Somerset

Phosphate Pollution: Failure to Remove or Mitigate

This Council resolves to:

- Instruct the Chief Executive to write to the relevant Government Ministers, i.e. the Parliamentary Under-Secretary of State for Environment, Food and Rural affairs (Rebecca Pow MP), and the Secretary of State (The Right Honourable George Eustice MP) requesting urgent intervention and immediate resourcing for statutory agencies to address the issues of phosphate overload which are ravaging South Somerset's economy, ecology and communities.
- Press the recently-established Defra/DLUHC Ministerial Task Force to work to reduce nutrient pollution by establishing a strategically-led co-ordinated approach through the Environment Agency (EA) or Natural England (NE) with non-government stakeholders such as the Home Builders Federation (HBF), Royal Institution of Chartered Surveyors (RICS) and Local Government Association (LGA), recognising that this is an industry responsibility. And press the EA and NE to recognise their joint responsibility to establish a strategically led co-ordinated approach.
- Urge Central Government to pressure Ofwat to adopt a strategic approach to adopting measures which ensure development is phosphate neutral in the catchment area for the Somerset Levels and Moors Ramsar Site, including short term temporary measures followed up by long term strategic mitigation measures, such as a large-scale habitat creation scheme, to ensure phosphate neutrality.
- Demand that Wessex Water bring forward and increase its 5-10 year investment in the removal of phosphates from sewage at its treatment plants of all sizes which discharge into the catchment of all local rivers, including their tributaries, rhines and ditches.
- Record its dissatisfaction with the severely delayed progress of Wessex Water EnTrade in setting up mitigation arrangements, especially that the necessary legal controls were not presented earlier in the process, thus to unlock development.
- Invite the LGA to bring further pressure on Government and non-Government stakeholders to deliver a strategic programme to ensure phosphate neutrality.



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Council registers its considerable disappointment that neither the Environment Agency (EA) nor Natural England (NE) have been forthcoming with a solution.

Council is deeply concerned that this situation has a major negative effect on our local communities and economy, with our Five-year Housing Land Supply projections now negatively affected by NE's moratorium, disadvantaging South Somerset communities in the long term.

Background:

Currently, any planning application within the Somerset Levels and Moors Ramsar site catchment area cannot be granted planning permission if it will produce an increase in nutrient waste with a phosphates element, whether that is human, livestock or anaerobic digester waste, until a Habitats Regulations Assessment (HRA) has been undertaken.

Many planning applications across South Somerset have been held up since August 2020 following a requirement issued by Natural England (NE) in light of the Dutch "N" (Nutrients) court case ruling, that the Somerset Levels and Moors Ramsar Sites are at risk from the effects of eutrophication caused by excessive phosphates. The ruling has resulted in greater scrutiny of plans or projects that will result in increased nutrient loads, and proscribes nutrient discharge into watercourses which may flow into the designated Somerset Levels and Moors Ramsar protected site, a designated feature of the SSSI.

South Somerset District Council area includes parts of the Somerset Levels & Moors Ramsar site as defined under the Ramsar Convention on "Wetlands of International Importance especially as Waterfowl Habitat", which has been updated every three years at COP since it was adopted in 1971 in Ramsar, Iran.

In November 2020, Wessex Water's EnTrade subsidiary undertook to work with South Somerset District Council and other Somerset councils on mitigation arrangements in the form of an online 'Phosphates Credits' market, with the intention of having these in place in the first quarter of 2021.

At a meeting with District Executive members in May 2021 Wessex Water EnTrade indicated that this 'Phosphates Credits' market would be delayed until the Autumn of 2021. It is still not in place, in Spring 2022, well over a year after it was first proposed.

This council resolved at its meeting in February 2021, to express its "deep concern about recent and continuing long delays in consideration of most residential planning applications as a result of Natural England's requirement on us to carry out greater scrutiny of the effects of plans or projects that are likely to increase discharge of nutrients and hence phosphate loads to unacceptable levels at internationally important sites".

A year later, this concern has deepened to become a fear that the proposed solution either will never happen, or will be unworkable.

Whilst mitigation arrangements may be a temporary means of dealing with phosphate pollution, they are expensive and less than satisfactory: they merely combine a range



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of phosphate-neutral and phosphate-removing projects – which derive largely from their particular locations & characteristics - with the immediate need to release housing development now. Prioritising phosphate reduction projects over other land management considerations will not keep pace with meeting SSDC's urgent housing requirements.

More than half of phosphate pollution is human in origin, so government's apparent intention to remove the farming portion, which is less than half, will have insufficient effect.

In parallel, Wessex Water has been working with developers on the possibility of installing Package Treatment Plants (mini sewage plants) within developments, to prevent phosphates reaching a river catchment. These should be co-ordinated by Natural England, the Environment Agency (EA) and Wessex Water (WW) to avoid a piecemeal approach.

Setting up a pilot 'Phosphates Credits' market has, we understand, required complex and lengthy negotiations between Wessex Water EnTrade, the Somerset district councils, and local landowners and property developers.

SSDC is in a worse position than the other three district councils in Somerset, because two of them are little affected, and one has a temporary solution because it owns its own housing, a solution not available to SSDC. County is not directly involved in relevant planning.

Wessex Water EnTrade claims that various requirements from Local Planning Authorities, including SSDC, have been part of the delay. These include agreement on handling the long-term liabilities associated with the maintenance and monitoring of projects. The need for these was, however, presented by EnTrade somewhat late in the negotiation process.

For those wanting to build houses or build additional livestock accommodation, the situation is utterly unsatisfactory.

Motions

The following Motion has been submitted by Councillor Jason Baker:
The Motion is seconded by Councillor Jenny Kenton

Flood risk alleviation and enforcement

As you will be aware many parts of our district have increasingly suffered over the last few years with more severe and regular flooding. Whilst we understand that development must take place, we want to see a more robust system of engagement between our planning department and the lead flood authority.

Flood alleviation schemes must take into account both the water that the scheme creates and the increase in flow due to the replacement of open fields with roads, this water will have travelled through the site before but been reduced by the field taking some of the water thus moving water more quickly downhill, as we build out into the upper regions of our towns we are allowing more water to move more quickly through our road system to the bottom and into small water courses that can't take it

Schemes must be fit for purpose and be fully agreed by the lead flood authority prior to planning permission, they should be checked that they are built to plan by a body like building control, they must have a robust maintenance plan in place and subject to regular checks which can be enforced if work is not undertaken, there must be a reliable body to take control of the maintenance of the scheme.

South Somerset District Council should not only seek to ensure that a fit for purpose flood prevention plan is in place for new applications, but they should also look to gain a contribution to improve the infrastructure to alleviate problems further downstream and improve the current ageing infrastructure.

South Somerset District Councils flood alleviation ponds should be subject to a regular maintenance program and be checked by a competent person regularly and a record kept of checks and work carried out, any work should be graded and prioritized within the work schedule.

South Somerset District Council passed a motion in 2019 which specifically recognised the climate emergency, and we now require Flood Prevention Officers to prioritize flood prevention schemes and advise local councils and voluntary groups on how they can assist in reporting issues as well as maintenance and emergencies.

Council therefore agrees

- All planning permissions must include sufficient information and conditions to ensure that not only are the surface water designs appropriate and meet best



practice requirements but also that all future management arrangements are approved by the planning authority in conjunction with the LLFA.

- All relevant sites should have a maintenance plan in place that has been approved by the LLFA
 - Members request that we contact the LLFA to ask that schemes are be periodically inspected to ensure correct maintenance is taking place and an enforcement policy is put in place if schemes are not maintained.
 - Whether through providing feedback on individual planning applications or through direct representation, to seek the Council's support to ensure that water companies focus upon maintaining and improving existing infrastructure to meet current and future needs
 - To ensure that in setting priorities for the new Somerset Council and its planning policy works, that SSDC emphasises the importance of future proofing new developments in relation flood risk and flood management
-

Questions under Procedure Rule 10

The following question has been submitted by Councillor Colin Winder:

The council has now approved the audit committee terms of reference which states under governance and risk control:

1.6 To monitor progress in addressing risk related issues reported to the committee.

1.8 To review the assessment of fraud risk and potential harm to the council from fraud and corruption.

Bearing in mind that the Audit Committee budget was used to finance the investigation, will the CEO now present to the Audit Committee the full details of the investigation into bullying and corruption which resulted in the dismissal in senior staff?

The following question has been submitted by Councillor Martin Wale:

Has a full independent or internal audit been carried out in respect of Lufton Depot since the Independent investigations and the dismissal of the Director Clare Pestell and the Manager Chris Cooper resigning?



Date of Next Meeting

Members are asked to note that the next scheduled meeting of the Full Council is a reserve date and will only be engaged if there is business to discuss.

The reserve date is **Thursday, 21st April 2022 at the Council Offices, Brympton Way, Yeovil** and as a virtual meeting using Zoom meeting software commencing **at 6.30 p.m.**
