

## **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.

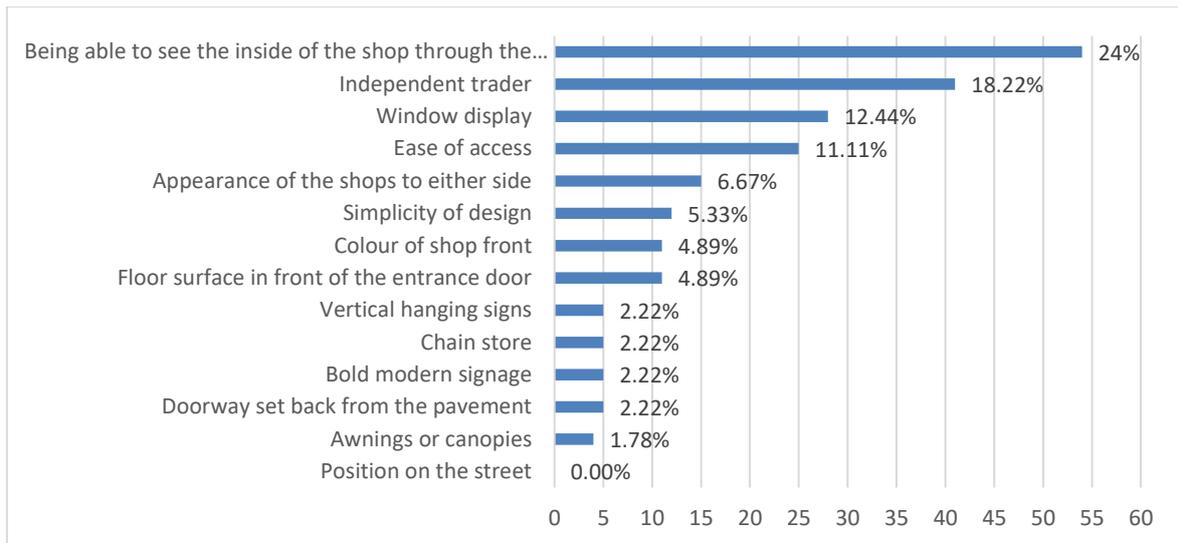


Figure 1: Quantitative Data: “What invites you to enter a shop? What makes a shop attractive to you?”

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%)

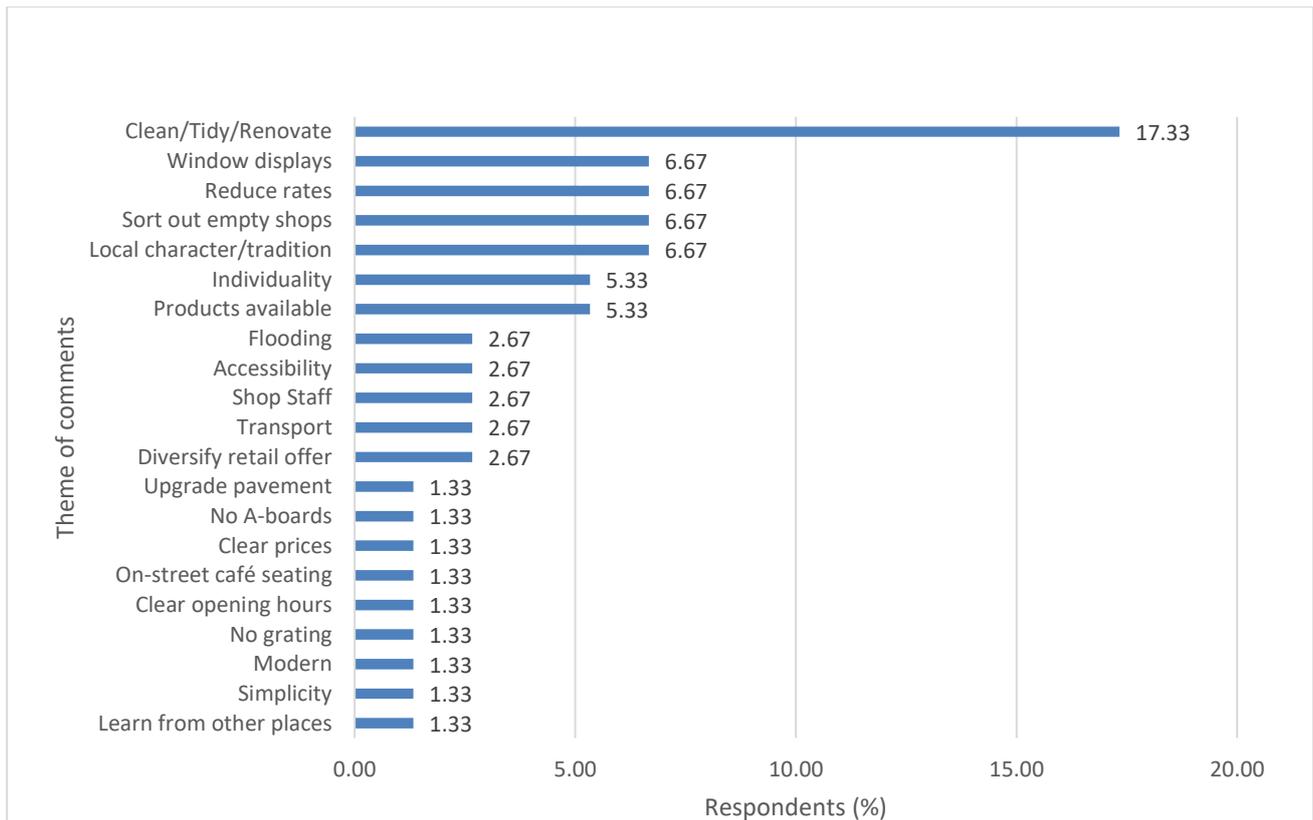


Figure 2: Coded Qualitative Data: "Any further comments?"

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 10<sup>th</sup> December 2021 until Friday 21<sup>st</sup> 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.

	<b>Representation</b>	<b>Summary of Main Issues</b>	<b>Action Taken</b>
1.	<p><b>DORSET COUNCIL</b> <b>Service Manager for Conservation, Economic Growth and Infrastructure</b></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"> <li>• Supportive</li> <li>• Positive feedback on use of photos</li> </ul>	No action required
2.	<p><b>ENVIRONMENT AGENCY</b> <b>Sustainable Places – Planning Advisor</b></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"> <li>• No comments</li> </ul>	No action required
3.	<p><b>NATIONAL HIGHWAYS</b> <b>Planning Manager (Highways Development Management), Operations</b></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"> <li>• No comments on shop front design/access/security</li> <li>• Recommendation regarding vehicle movement – outside the scope of the SPD</li> </ul>	No action required

	Representation	Summary of Main Issues	Action Taken
4.	<p><b>NATURAL ENGLAND</b> <b>Sustainable Development Lead Advisor, Wessex Area Team</b></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"> <li>• No new comments (further to those made during the informal consultation, which were previously taken account of, see 1.4.2 above)</li> <li>• No objections</li> <li>• Agreement with environmental screening</li> </ul>	<p>No action required</p>

	Representation	Summary of Main Issues	Action Taken
	<p><i>[Text from the letter dated 1<sup>st</sup> 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><b>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:</b></p> <p><b>Green Infrastructure</b> 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>		

	<b>Representation</b>	<b>Summary of Main Issues</b>	<b>Action Taken</b>
	<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"> <li>• green roof systems and roof gardens;</li> <li>• green walls to provide insulation or shading and cooling;</li> <li>• new tree planting or altering the management of land (e.g. management of verges to enhance biodiversity).</li> </ul> <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><b>Biodiversity enhancement</b> 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>		

	<b>Representation</b>	<b>Summary of Main Issues</b>	<b>Action Taken</b>
	<p>Design Guide SPD, which advises (amongst other matters) a ratio of one nest/roost box per residential unit.</p> <p><b>Landscape enhancement</b> 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><b>Other design considerations</b> 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><b>Strategic Environmental Assessment/Habitats Regulations Assessment</b> 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>		

	<b>Representation</b>	<b>Summary of Main Issues</b>	<b>Action Taken</b>
	<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 <a href="mailto:consultations@naturalengland.org.uk">consultations@naturalengland.org.uk</a></p>		
<b>5.</b>	<p><b>ANON-BQV3-KSNS-U</b></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"> <li>• Concern over impact of SPD – comment doesn't reflect full scope of the document, which is made clear in the introduction.</li> <li>• Parking suggestion – outside the scope of the SPD.</li> </ul>	No action required
<b>6.</b>	<p><b>ANON-BQV3-KSNZ-2</b></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 &amp; 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 &amp; 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 &amp; face-lift!</p>	<ul style="list-style-type: none"> <li>• Comment relating to specific property, Listed Building consent and the Chard HSHAZ scheme, rather than content of the SPD.</li> </ul>	<p>No action required for SPD.</p>
7.	<p><b>HISTORIC ENGLAND</b> <b>Historic Environment Planning Adviser (South West)</b></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><b>Draft Chard Shopfront Design Guide</b></p>	<ul style="list-style-type: none"> <li>• Strong support for SPD's intent and its adoption</li> <li>• Suggestions to improve the SPD's usability and usefulness: <ul style="list-style-type: none"> <li>○ Editorial and presentational changes</li> <li>○ Correcting an error in</li> </ul> </li> </ul>	<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>

	<b>Representation</b>	<b>Summary of Main Issues</b>	<b>Action Taken</b>
	<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"> <li>• 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.</li> <li>• 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>.</li> <li>• In sections 2 and 3, there are a mix of examples from Chard and elsewhere used to illustrate the shopfront styles and good design.</li> </ul>	<p>Planning Policy reference in preface</p> <ul style="list-style-type: none"> <li>○ Adding in advice on bi-fold doors, independent access to upper floors, and alteration or removal of shop fronts</li> <li>○ Providing links to other relevant information sources</li> <li>• Agreement with environmental screening</li> </ul>	<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>

	<b>Representation</b>	<b>Summary of Main Issues</b>	<b>Action Taken</b>
	<p>However, if 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"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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).</li> </ul> <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"> <li>• North Somerset Council's <u>Shopfront Design Guide</u> (adopted 2019) – an example of a longer-style document;</li> </ul>		

	<b>Representation</b>	<b>Summary of Main Issues</b>	<b>Action Taken</b>
	<ul style="list-style-type: none"> <li>Tewkesbury Borough Council's <u>Draft Shopfronts, Shutters and Signage Design Guidance</u> (2021) – an example of a shorter-style document</li> </ul> <p><b>SEA Screening Statement</b> 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><b>SOMERSET COUNTY COUNCIL AS THE HIGHWAY AUTHORITY</b> <b>Principal Planning Liaison Officer, South Somerset District</b></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"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>A number of suggested additions in relation to the impact of shop</li> </ul>	<p>An appendix has been added to the SPD to cover these points</p>

	<b>Representation</b>	<b>Summary of Main Issues</b>	<b>Action Taken</b>
	<ul style="list-style-type: none"> <li>• Any existing element which does oversail the highway must be covered by an appropriate licence under s177 or s178 Highways Act 1980</li> <li>• All doors and windows should open inwards and not out onto highway</li> <li>• Seating and tables on highway should be covered by an appropriate licence.</li> <li>• No displays of produce or merchandise including any shelving, tables, rails, racks or similar equipment will be allowed on land covered by highway rights</li> <li>• No advertising material including free standing signs, 'A' frames or similar elements will be placed on highway</li> <li>• All illuminated signage should conform 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.</li> </ul> <p><b><i>[The first two bullet points were subsequently clarified as follows:]</i></b></p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> </ul>	<p>fronts on the highway</p>	