

APPENDIX 1: STATEMENT OF CONSULTATION ON THE DRAFT DESIGN GUIDE TO SHOPFRONTS SUPPLEMENTARY PLANNING DOCUMENT

January 2022

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1. Introduction

1.1 A Draft Design Guide to Shopfronts Supplementary Planning Document (SPD) was published for consultation in July 2021. This set out further detail to supplement the policies in the Reading Borough Local Plan, adopted in November 2019. This statement summarises the consultation that was undertaken on the SPD, and reports on the responses received.

2. Summary of Consultation Measures

2.1 The consultation was undertaken between 30th July and 24th September 2021. The consultation period lasted for eight weeks in accordance with the relevant regulations, the Council’s adopted Statement of Community Involvement (SCI) and to allow two weeks additional time in order to account for the summer holidays.

2.2 Consultation involved contacting all those on the Council’s planning policy consultation list, which includes a mix of statutory consultees, businesses, voluntary and community organisations and interested individuals, around 1,200 contacts in total. The

document was also sent to the members of the Reading Business Improvement District list (approx. 900 local business owners) and approximately 40 additional business owners affiliated with the High Street Heritage Action Zone project.

- 2.3 The document was also published on the Council’s website. The consultation took place while social distancing measures were in place in response to the Covid-19 pandemic, which meant that public buildings such as the Civic Offices and public libraries were partially closed to the public or had limited opening hours. Hard copies were made available at the Civic Offices and public libraries.
- 2.4 Two online presentations were held in with assistance from heritage consultants and architects at Purcell in early September. These included a 50-minute presentation on the content of the SPD and an opportunity for members of the public to ask questions or give feedback. A recording of the first presentation is available here: <https://www.youtube.com/watch?v=yuY16MpS7Gg>. There were seven members of the public in attendance across the two sessions and the recording was made publicly available for those who were unable to attend.
- 2.5 A drop-in session was held on the Oxford Road outside the northern entrance of the Broad Street Mall. Images and illustrations of the proposals were on display and officers were available to discuss the proposals and answer questions. Approximately 30 members of the public attended.

3. Summary of Responses

- 3.1 Written responses were received from 15 individuals or organisations, although two of these were merely to confirm that there were no comments. A total of 113 individual points were made by these respondents. The respondents are set out below:
 - Aldrich, Dr Megan
 - Beardmore, Alex
 - Blackburn, Kevin
 - British Sign and Graphic Association
 - Canal and River Trust
 - Carter, Alice
 - Caversham and District Residents Association

- Conservation Area Advisory Committee
- Cook, Tim
- Cox, Robert
- Highways England
- Historic England
- Natural England
- Shook, Ryan
- Unsworth, Elizabeth

3.2 The following points were among those raised by respondents. The full set of representations is set out in Appendix 1.

- Widespread support for the SPD's aim and its content. Residents felt that the guidance would build resilience for high streets in times of economic uncertainty, improve the experience of the town for residents and contribute to Reading's identity as a tourist and heritage destination;
- Comments relating to the amount of detail provided with regard to materials and maintenance over time;
- The need for more language to encourage (and require, where possible) disability access, particularly for wheelchair users and the visually impaired as some respondents felt that heritage was being privileged above access;
- A number of comments that guidance for fascia design, lighting and signage were too onerous;
- The need to clarify that the guidance applies to shopfronts throughout the entire Borough, rather than just those within high streets or only historic shopfronts;
- Comments stating that the benefits of good shopfront design should be further emphasised, for both shopowners and the Borough as a whole;
- The need to clearly define terms used throughout the document;
- The need to acknowledge the positive contributions of high-quality modern shopfronts;
- Support for guidance regarding security shutters, but the need to provide further detail;
- Some comments on the further images or illustrations needed to provide clear examples of the guidance;

- Concerns that the term “active frontage” was not clearly defined or its benefits explained;
- Calls for more references to energy efficiency standards, climate change and sustainable design and construction requirements; and
- Comments from Historic England providing further detail regarding historic shopfronts of particular periods, a request for recognition that innovative designs can greatly contribute to the streetscene and suggestions for more clarification regarding advertisements and illumination in order to prevent requirements from being too onerous.

3.3 Detailed summaries of each individual representation, as well as a response from the Council are included in Appendix 1. These are set out in document order.

APPENDIX 1: SUMMARY OF REPRESENTATIONS AND COUNCIL RESPONSES

The table below includes summaries of the representations received to the consultation, listed in document order. Please be aware that these are not necessarily verbatim comments, rather they are summarised for ease of reference.

Table 1: Summary of representations received and Council responses

Name	Document ref (consultation version)	Representation	Council Response
British Sign and Graphic Association (BSGA)	General	We have carefully examined the proposed guidance in this draft SPD and are concerned that, in some aspects, it exceeds what is permitted in law; that it is impractical and unrealistic; that it totally fails to take account of the actuality of Reading's shopping environment; and that its requirements are unduly onerous and excessive. We recognise that the SPD aims to improve shopfront design; and we agree that this is always desirable in the interests of appearance, character, vitality and viability of shopping streets. We are convinced that such improvement should not be sought through impractical or expensive advice. Shopowners are far more likely to follow guidance which is not overly demanding, yet still achieves a measure of visual improvement for the area as a whole. The SPD should not be a tool with which to beat applicants but should encourage reasonable improvements for which shopowners will be more willing to foot the bill.	Noted. Some limited changes are proposed and addressed below in reference to specific comments from the BSGA. It is not considered that the overall guidance is too onerous for shopowners, but rather that high-quality design requirements will benefit shopowners and encourage trade within the town while improving the overall built environment. Change proposed to insert new paragraph 4.5 to state that each application will be considered on a case-by-case basis in order to ensure that a balance is struck between visual improvement and practicality or cost. Images and illustrations in the document are indicative, rather than prescriptive.

Name	Document ref (consultation version)	Representation	Council Response
Conservation Area Advisory Committee (CAAC)	General	<p>Reading CAAC wholeheartedly welcome this document which supports the policies of the Local Plan. Shopfronts are a particularly key feature of Reading's central conservation areas and clear and detailed guidance on appropriate design will be of great assistance in enhancing the character and appearance of these areas.</p> <p>Our comments relate to the guide, not just those sections relevant to Conservation Areas, listed buildings and other heritage assets.</p>	Noted. No change required.

<p>Conservation Area Advisory Committee (CAAC)</p>	<p>General</p>	<p>The design guide must give clear guidance for it to be successfully implemented. Not all of Reading’s shopfronts today were purpose-built as retail shops. There is great diversity in the origins and original uses of Reading shopfronts which should be celebrated, and each property should be allowed to tell its story. It is possible that an apparently out of place shopfront may be worthy of retention for community and heritage interest.</p> <p>Along Broad St there are shops that began as purpose-built public houses, for example. If the retail shopfronts were to be altered would a return to the original pub style entrances and fenestration be appropriate or a retail shopfront of the time of the original build? What original features are being looked for, those from the pub of the first retail conversion? A similar question would arise in relation to purpose-built bank conversions to retail or another non-bank uses and vice-versa.</p> <p>Outside the town centre (e.g. Whitley St) many shopfronts are conversions from residential use or residential/professional premises. Not all the residential properties were built at the same time and shopfronts were added at different times. This piecemeal approach has led to a lack of uniformity but some historic features (e.g. corbels and risers and residential entrances may exist). Our assumption would be that the default shop design should be in keeping with the age and style of the property but alternatively it could be in keeping with the date of first shopfront conversion?</p>	<p>Change proposed to include new paragraph at 4.6. This states: “Many shopfronts in Reading were not initially constructed as shopfronts. There is great diversity of other purpose-built building types in use as shopfronts, for example public houses, banks or residences. These shopfronts present an opportunity to reflect some of the original elements of the purpose-built use. Each application will be considered on a case-by-case basis and architectural features of the original use shall be retained or reinstated, where practical. Proposals should seek to reflect the age and initial style of the property as much as possible. Modern, purpose-built shopping parades are expected to reflect the era in which they were built.”</p> <p>Change proposed to include at 2.2, “This guidance does not apply to shopfronts enclosed within private premises, such as the Oracle or the Broad Street Mall.”</p>
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Name	Document ref (consultation version)	Representation	Council Response
		In relation to purpose-built modern parades outside the town centre (e.g. 261-273 Basingstoke Road). Our assumption would be that the historic features would be those of the time that the parade was constructed. To what extent does this guide apply to shopping malls such as Broad Street Mall and the Oracle? Would the interior shop fronts be treated differently from street facing shopfronts?	
Conservation Area Advisory Committee (CAAC)	General	The images are very useful and cover a wide range of ages of shopfronts. We liked the use of the black and white line drawing effect.	Noted. No change required.
Conservation Area Advisory Committee (CAAC)	General	We would prefer captions at the bottom of the image, as that is usual.	No change proposed. This format is now part of the standard Reading Borough Council template for Supplementary Planning Documents.

Name	Document ref (consultation version)	Representation	Council Response
Conservation Area Advisory Committee (CAAC)	General	Additional measures as a response to the climate emergency should be mentioned e.g. interior or exterior blinds and shades as an alternative to awnings to reduce sunlight.	Change proposed to add new paragraph at 4.7: “In light of the Climate Emergency declared by Reading Borough Council in February 2019 and the publication of the Sustainable Design and Construction Supplementary Planning Document, applicants should consider additional measures as response to climate change at the earliest possible stage. In shopfronts, for example, blinds, shades or canopies may increase resilience as the frequency of extreme heat events increases and retention of historic features will help to reduce new waste being generated during construction. Applicants must comply by the climate change policies of the Local Plan and the specific guidance set out in the Sustainable Design and Construction Supplementary Planning Document as well as national energy efficiency standards and all requirements set out in the Building Regulations.”
Conservation Area Advisory Committee (CAAC)	General	It is unclear what is expected of frontages and fascia with multiple entrances, such as a large department store.	No change proposed. The document states that “fascia should span the entire width of the shopfront between corbels.” It is not considered appropriate to give specific advice for frontages with multiple entrance as each site is different and will be approached on a case-by-case basis.
Conservation Area Advisory Committee (CAAC)	General	There is a lack of guidance for arcades such as King’s Walk or Harris Arcade.	This guidance is not intended to apply to “interior” shopfronts, such as those in arcades or shopping malls, although the entrances to these sites would be subject to the requirements. This is now addressed in paragraph 2.2.

Name	Document ref (consultation version)	Representation	Council Response
Conservation Area Advisory Committee (CAAC)	General	The SPD does not refer to the enforcement consequences that may result if guidance is not followed.	It is not considered that the SPD is the appropriate place to detail enforcement actions. The document refers to the Council’s planning enforcement webpage. In any case, it is difficult to outline enforcement consequences for all shopfronts in breach of requirements, as these are decided upon by the planning enforcement team on a case-by-case basis.
Conservation Area Advisory Committee (CAAC)	General	There is no guidance for burglar, fire alarm and CCTV positioning.	It is not considered that the SPD is the appropriate place to provide such specific guidance, as installation of these features usually does not require planning permission. The SPD does state that frontages should seek to improve the visual amenity of the area and avoid clutter.
Caversham and District Residents Association (CADRA)	General	This is an excellent piece of work. It is much needed and very welcome.	Noted. No change required.
Canal and River Trust	General	We have no comments to make.	Noted. No change required.
Highways England	General	We have reviewed the above consultation and have no comments.	Noted. No change required.
Historic England	General	It needs to be clear that an innovative design of greater quality would still be permitted, even if it does not reflect a standard historic style. Innovative designs can add immensely to the street scene.	Change proposed to paragraph 4.4: “Modern shopfront designs and materials are often inappropriate as part of a historic building or within a conservation area where they detract from the character or appearance the area is designed to protect. In some cases, high-quality, innovative designs may be permitted as they can add immensely to the streetscene if well-designed.”

Name	Document ref (consultation version)	Representation	Council Response
Blackburn, Kevin	General	As a customer of Reading's shops, I like the spirit behind the proposed policy and the resulting design guide. I wish you well in implementing it.	Noted. No change required.
Aldrich, Dr Megan	General	I am not always complimentary about the way historic buildings and streetscapes are treated in Reading, but I was simply delighted to read this very strong document. Reading has a very strong, Victorian, redbrick character which is worth preserving and protecting. Particularly in a post-Covid world where we are re-defining our understanding of town centres and what they should be, this is very timely and will have a positive impact on the attractiveness of Reading as a place to visit and reside in. Some shops will inevitably change purpose in the ten years ahead with continued fallout from the pandemic and the shift to online commerce, but this doesn't mean that historic architectural features should be lost. The cohesion of streetscapes is vital in making an area attractive and intelligible in terms of the history of the town, as it has grown and developed. It will certainly assist plans to develop Reading as a tourist destination.	Noted. No change required.

Name	Document ref (consultation version)	Representation	Council Response
Aldrich, Dr Megan	General	<p>The points raising concerning specific architectural features—particularly fenestration, or the treatment of window design—are absolutely key in claiming back town centre streets. I particularly support the idea of reinstating missing architectural features, where possible, and keeping signage under control. This will not lessen the commercial appeal of shops in Reading—quite the reverse! The document rightly illustrates a few comparative examples in Brighton and Oxford where shopfronts are treated as part of the historic fabric of the town. The vintage shop on Watlington Street is a very attractive example of an appropriate shop front in Reading that works harmoniously with its environment, not against it.</p>	Noted. No change required.
Aldrich, Dr Megan	General	<p>I also understood that these guidelines will apply to all shopfronts, not simply ones in Conservation Areas - or have I misunderstood? In that case, a strong argument could be made for including Caversham Road leading up to Caversham Bridge - and perhaps the Conservation Area over the Bridge, as well? Only in the past few years has there been an erosion of what was formerly a very cohesive streetscape on Caversham Road in an architecturally cohesive part of Reading.</p>	<p>The guidance applies to all shopfronts, not only those in conservation areas, and pertains to the entire Borough including the Caversham Road leading up to Caversham Bridge and the Conservation Area. This is stated in paragraph 2.1.</p>

Natural England	General	<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 NPPF 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: https://www.gov.uk/guidance/natural-environment</p> <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; 	<p>Noted. It is not considered that this SPD is the appropriate place to provide guidance about green infrastructure, but applicants must fulfil the green infrastructure requirements of the Local Plan. Shopfront proposals provide limited opportunities to increase biodiversity or provide green infrastructure as they are usually limited to a building’s ground floor frontage.</p>
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Name	Document ref (consultation version)	Representation	Council Response
		<p>community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessment provide tools for planners and developers to consider how new development might makes a positive contribution to that character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts.</p> <p>Other design considerations - The NPPF includes several design principles which could be considered, including the impacts of lighting on landscape and biodiversity (paragraph 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: Strategic environmental assessment and sustainability appraisal - GOV.UK (www.gov.uk) While SPDs are unlikely to give rise to likely significant effect 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 Strategies Environmental Assessment or Habitats Regulation Assessment, you are required to consult is a certain stage as set out in the Planning Practice Guidance.</p>	

Name	Document ref (consultation version)	Representation	Council Response
Cox, Robert	General	On 7th Sept I passed by the drop-in. The stand could have been much bigger and more noticeable as this topic has been seriously neglected for many years. Too many shops and businesses have installed or re-built shopfronts seemingly following either fashion or minimising the cost of the refit, or both. In neither case has much, or indeed any, thought been given to the way these changes work with the building itself or are compatible with the surroundings. I especially liked the rows of photographs and artists' impressions of a row of shopfronts showing the existing mishmash and what could be achieved with some thought and money.	Noted. The Council's drop-in session aimed to provide larger illustrations of the proposals and officers were made available to answer questions and was held with limited resources. No change required.
Cox, Robert	General	In one of the photographs of a shop front showing good practice was the house number. Too often these are missing - in my local parade of shops (in Christchurch Road) only one or two show the number - which makes the buildings look anonymous.	Noted. Change proposed to paragraph 4.17 to refer to the Council's Street Naming and Property Numbering Protocol.
Cox, Robert	General	If this initiative is going to be successful and to encourage people to follow the spirit of the Guide rather than just the letter, then I would suggest that the Council has to promote the benefits of following the guidelines to the shopkeepers or developers in terms of improved business as shop fronts following the guidelines will almost certainly be more expensive than some of the cheap plastic boxes.	Noted. No change required. The introduction aims to emphasise the benefits of physical improvements for both shopowners and the community as a whole. The High Street Heritage Action Zone project aims to work closely with individual shop owners to help fund and implement proposals.

Name	Document ref (consultation version)	Representation	Council Response
Cox, Robert	General	I also hope that this will be applicable to larger shops and retail chains so that their “house styles” do not clash with the building.	Noted. No change required. Paragraph 4.4 states that chain shops or larger shops that wish to use a house style or corporate image must adapt these to fit within the historic environment.
Cox, Robert	General	I also hope that the Design Guide will be mandatory for newly built premises.	Noted. Paragraph 2.2 states that the SPD applies to all ground floor premises with a fascia or window display, including newly-built premises.
Shook, Ryan	General	I am quite impressed and pleased with the contents of the draft document. I wish this had been in place several years ago. There are many excellent pictures of good and bad examples.	Noted. No change required.
Shook, Ryan	General	On a different note, it would be great to have a feature in the planning portal that allows someone to receive updates on any application, especially one for which they have submitted feedback.	Noted. No change required, but this suggestion has been sent to our Development Management team.
Cook, Tim	General	Having shops with a continuity of colours make the street look more upmarket and stylish. Every other shop having gaudy colours to stand out lowers the tone.	Noted. The SPD aims to achieve this, but cannot require shopfronts to be specific colours as this is considered to be prescriptive and onerous. Instead, planning applications will be required to “respect the character of the wider area in terms of colour.”
Cook, Tim	General	Do the shops have trees or seating outside? More trees, hedges and vegetation should be encouraged around shopfronts.	Noted. It is not considered that this SPD is the appropriate place to provide guidance about green infrastructure, but applicants must fulfil the green infrastructure requirements of the Local Plan. Shopfront proposals provide limited opportunities to increase biodiversity or provide green infrastructure as they are usually limited to a building’s ground floor frontage.

Name	Document ref (consultation version)	Representation	Council Response
Cook, Tim	General	Have you reviewed other Councils? How have they implemented SPDs? Have you looked further across the globe for good ideas?	Noted. No change required. While producing the draft document, planning officers reviewed many SPDs of other local authorities.
Conservation Area Advisory Committee (CAAC)	Paragraph 1.1	If the shopfront design guide is meant to apply to all shops (and other premises defined in 2.2) then the use of the word 'high street' is unhelpful. The language does not align with policy RL1 of the New Local Plan and appears to exclude small retail developments or single isolated shops such as those shown in figure 26.	Noted. Change proposed to amend some references to the high street to include all shopfront units across the Borough. References to the high street have been retained in relation to discussion of the High Street Heritage Action Zone. Change proposed to paragraph 2.2 to clarify that shopfronts not located within high streets are also subject to requirements.

<p>Conservation Area Advisory Committee (CAAC)</p>	<p>Paragraph 1.2</p>	<p>The explanation of benefits of following the design guide should be expanded. It needs to recognise the business issues facing all shopkeepers and owners and the practicalities and costs for all parties involved. Potential economic positives should be emphasised more strongly and clearly:</p> <p>“Studies have shown (insert relevant link) that the benefits of physical improvements to shopfronts - not only in historic high streets but also generally in smaller shopping areas and parades as well as smaller clusters and even individual isolated shops - are wide-reaching leaving to:</p> <ul style="list-style-type: none"> -increased retail footfall and dwell time; -greater levels of occupancy; -more usable floorspace; -higher land values; -increased attractiveness for investment. <p>Other wider social benefits are:</p> <ul style="list-style-type: none"> -enhanced sense of civic pride and higher levels of engagement; -improved community cohesion and social outcomes; -contribute to an enhanced sense of place and vibrancy. <p>These positive effects tend to reduce the incidence of anti-social behaviour and criminal damage such as graffiti which can have negative effects on footfall and business levels. This SPD describes how these aims will be achieved.”</p>	<p>Change proposed.</p>
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Name	Document ref (consultation version)	Representation	Council Response
Conservation Area Advisory Committee (CAAC)	Paragraph 2.2	Remove “hot food” from takeaway as presumably the SPD also applies to ice-cream parlours, etc. It might be easier to mention what is not covered than give examples of what is. For example, are tattoo studios, opticians, solicitors and accountants covered?	Change proposed to include additional examples. No change proposed to remove “hot-food” as this is a term used in planning legislation. Ice cream parlours are included under “non-retail uses.” It would be too descriptive and lengthy to prescribe each use and outlining what is not covered may cause confusion or prevent applications from coming forward. It is considered that the best definition is “all ground floor premises with a fascia and/or window display.”
Conservation Area Advisory Committee (CAAC)	Paragraph 2.3	We strongly support this comment.	Noted.
Conservation Area Advisory Committee (CAAC)	Paragraph 2.4	This paragraph is confusing. What is meant by advertisements relating to a shopfront?	Change proposed to define advertisements as “signage, such as fascia, posters, blinds displaying images or wording, banners or projecting signs.”
Conservation Area Advisory Committee (CAAC)	Paragraph 2.5	We would prefer a stronger statement such as, “This SPD is to be used...”.	Change proposed.
Conservation Area Advisory Committee (CAAC)	Paragraph 2.6	Frontage line should be defined. Is this the existing building line or the property boundary?	Change proposed to instead refer to “existing building line.”
Conservation Area Advisory Committee (CAAC)	Paragraph 2.6	For repair works and maintenance, what will be the process for consultation?	If the repair works require submission of a planning application, they will be subject to the standard consultation associated whereby a site notice is posted and members of the community can provide comment. If repair works do not require submission of a planning application, consultation cannot be required.

Name	Document ref (consultation version)	Representation	Council Response
Unsworth, Elizabeth	Paragraph 2.6	Although lighting is considered later in the document, it is not referred to here.	No change proposed. Although best practice guidance regarding lighting is provided in the SPD, most changes to lighting do not require planning approval.
Conservation Area Advisory Committee (CAAC)	Paragraph 2.7	This concerns designated heritage assets while paragraphs further on address undesignated heritage assets. Should this paragraph simply cover all heritage assets?	No change proposed. Listed building consent only applies to designated heritage assets. Should an application come forward that affects an undesignated heritage asset or asset on the Local List, this will be addressed at application stage on a case-by-case basis.
Conservation Area Advisory Committee (CAAC)	Paragraph 2.7	Heritage Asset (both designated and undesignated) should be defined in the glossary.	Change proposed to include definition for “heritage asset.” The definition also refers to local listing.
Conservation Area Advisory Committee (CAAC)	Paragraph 2.7	There is a missing word after “unapproved.” Third bullet - need to insert “or ventilation” after extractor. Fourth bullet - words in brackets are superfluous.	All changes proposed.
Unsworth, Elizabeth	Paragraph 2.7	There appears to be a word or phrase missing from this paragraph.	Change proposed.
Conservation Area Advisory Committee (CAAC)	Paragraph 2.9	This link is to the 2021 version of the NPPF, where the wording referenced is part of paragraph 86, section 7.	Change proposed.
Historic England	Paragraph 3.3	Some medieval shopfronts did employ stallrisers. In other cases, shops were located in basements or undercrofts. Several medieval undercrofts are believed to be preserved under buildings at the Market Place.	Change proposed to include this information.

Name	Document ref (consultation version)	Representation	Council Response
Historic England	Paragraph 3.4	Victorian shopfronts - some were formed of two or four panes (including transom lights). These were less expensive to insure than modern shopfronts as smaller panes cost less to replace. New materials included cast iron to create intricate detailing or slim profile framing (see example at 141 Oxford Road).	Change proposed to include this information.
Conservation Area Advisory Committee (CAAC)	Paragraph 3.5	“Dentils” should be defined in the glossary.	Change proposed.
Historic England	Paragraph 3.5	Edwardian period - This was also a period of increasing specialist shopfront design (butchers employing easy-to-clean glazed tiles with examples of products for sale, jewellers employing deeply recessed entrances to increase the area of window display). Many brands created their own shopfront styles.	Change proposed to include this information.
Historic England	Paragraph 3.6	The 20th century saw a move away from classicism as shops become focused towards “modern living.” A great example of Art Deco is located at the corner of West Street and Broad Street. Later shopfronts tend towards increasing modernist principles of simplicity and maximised glazing, sometimes angled to the street to draw the customer towards the door. Many national chains developed distinctive styles (including Marks and Spencers and Woolworths) and in some cases these distinctive buildings have outlived the brands themselves	Change proposed to include this information.

Name	Document ref (consultation version)	Representation	Council Response
British Sign and Graphic Association (BSGA)	Paragraph 4.1	In chapter 4, “General Design Principles,” no 3, any proposed signage (i.e. advertisements) is required by the Regulations to be considered on the basis of amenity (and public safety, but irrelevant here). Advertisements must not detract from visual amenity, but there is no statutory requirement for any advertisement to “enhance.” This also applies to conservation areas where preservation of existing amenity (without “enhancement” i.e. a neutral effect) is also acceptable. The principle should read: “Employs signage which does not detract from the building or street scene.”	Change proposed to emphasise that “signage must not detract and should ideally seek to enhance.” These general design principles are not intended to reflect a statutory requirement, but rather to set an expectation. Change proposed to amend paragraph 4.5 to emphasise that each application will be considered on a case-by-case basis and that examples are indicative, rather than prescriptive.

Name	Document ref (consultation version)	Representation	Council Response
British Sign and Graphic Association (BSGA)	Paragraph 4.1	Design principle no 6 must be balanced by an acceptance that, in general, shopowners can put anything they wish in their windows. This is also relevant to paragraphs 4.5, 4.6, 4.20 and 4.54 of the SPD. There may be good reasons why a particular business may require part of all of its windows to be obscured (i.e. to conceal tills or counters near windows; or for privacy; or simply because that's what the owner wants). Indeed, some establishments have traditionally had their windows totally obscured (e.g. betting shops, pawn shops). The Advertisements Regulations permit with deemed consent (or with total exception) all advertisements within buildings; and this, of course, includes any advertisements applied to the inside face of the glazing (and no planning permission is required where an advertisement display accords with the Regulations). The content of shop windows is a matter for the owner/occupier and not one for the local authority.	No change proposed. These general design principles are not intended to reflect a statutory requirement, but rather to set an expectation. Additional paragraph at the within section 4 emphasises that advertisements will be considered on a case-by-case basis and special circumstances considered by the Local Authority. If proposed advertisements are permitted with deemed consent and do not require a planning application the Local Authority will not have the opportunity to determine the application. The design principles are intended to encourage high-quality design and should be used as a guide, even when planning permission is not required.

Name	Document ref (consultation version)	Representation	Council Response
British Sign and Graphic Association (BSGA)	Paragraph 4.1	<p>In design principle 6, in paragraph 4.6 and elsewhere in the SPD (paragraph 4.60 in particular), there are inconsistencies in advice. These advise that shopfronts should always present an active frontage during the day and nights, but paragraphs 4.33 and 4.60 suggest that “external” lighting (which one assumes includes lit “external” advertisements) should only be used on premises which trade after dark. Firstly, the restriction implies an assessment by the local authority of whether the premises “trade after dark” - and, expressly in paragraph 4.60, of “requirement.” This is an assessment of “need” which is not permitted by the regulations (see PPG ID 18b-026-20140306). Further, virtually all premises will trade “after dark” (as well as “before light” during the winter months. This is a pointless requirement and unlawful. How can any premises present an “active” frontage at all times if all illumination is switched off (the authority cannot compel normal internal lighting to be left on at night)? We suggest to all references to “premises which trade after dark” be deleted to avoid these inconsistencies.</p>	<p>No change proposed. “Active frontage” does not refer to lighting or opening times, but rather that the ground floor use should reflect visual interest and activity, rather than a blank or closed façade. If the business is shut during nighttime hours, an active frontage would simply allow passerby to see into the windows, for example.</p> <p>Lighting guidance is intended as a best practice guide, rather than a strict requirement. Each application will be considered on a case-by-case basis.</p>
Conservation Area Advisory Committee (CAAC)	Paragraph 4.1	Obscured glazing is traditional and/or desirable in some shopfronts e.g. restaurants.	No change proposed. The Local Plan seeks to increase visibility into shopfronts and create a sense of visual interest and activity. Should obscured glazing be preferred, this will be considered on a case-by-case basis.

Name	Document ref (consultation version)	Representation	Council Response
Historic England	Paragraph 4.2	Applicants should identify local examples of original details to guide design proposals. The town has a wealth of historic photos showing the changing faces of shopfronts over the last 150 years.	Change proposed to include reference to historic photo collections.
British Sign and Graphic Association (BSGA)	Paragraph 4.4	The word “must” should be deleted and replaced with “may need to.” There are often circumstances in which “corporate” design may be wholly appropriate as proposed.	Change proposed.
Conservation Area Advisory Committee (CAAC)	Paragraph 4.4	Conservation areas may include modern buildings. How old is historic (over 50 years, over 100 years)?	Change proposed to refer to innovative modern designs that may contribute to the conservation area. “Historic” is intended to refer to the era predominately reflected by surrounding area or the date of the host building. Defining the age of “historic” may limit or confuse its application.
Historic England	Paragraph 4.4	Change to “Modern shopfront designs and materials are often inappropriate as part of a historic building or within a Conservation Area, where they can detract from the character or appearance the area is designed to protect.” This reflects that high-quality modern shopfronts may be the only option where a poor late-20th c insertion has replaced an earlier frontage.	Change proposed.
Unsworth, Elizabeth	Paragraph 4.6	“Remain active during both day and night” is unclear.	Change proposed to define “active” as providing visibility and avoiding a blank wall.
Historic England	Paragraph 4.6	Blinds could provide shopwindow advertising outside of opening hours.	Noted. No change proposed. This is not intended to apply to interior blinds in the evenings.

Name	Document ref (consultation version)	Representation	Council Response
Cook, Tim	Paragraph 4.6	You must consider the shopfront during the daytime and at night. Is the daytime shop front in keeping with its neighbours?	No change proposed. Most of the focus of this document is on the appearance of shopfronts during the daytime.
Historic England	Paragraph 4.7	Do you mean transoms instead of opening lights?	Change proposed.
Historic England	Paragraph 4.8	Applicants should not be required to install a stallriser if there wasn't one there before.	Change proposed.
Historic England	Paragraph 4.9	Polished granite is probably the most hard-wearing material and is often used in contemporary shopfront design. Glazed brick has also been used successfully. Red, grey or buff brick moulded terracotta cills and arches may best reflect Reading's distinct Victorian brick building traditions.	Changes proposed.

Name	Document ref (consultation version)	Representation	Council Response
British Sign and Graphic Association (BSGA)	Paragraph 4.10	We accept that some historic shopfronts may need to be coloured sensitively. However, the advice to “avoid excessive use of bright colours” is overly prescriptive for general application throughout the borough. What is a “bright” colour? Red or yellow? These are primary colours of nature and are commonly seen throughout shopping areas. Without bright colours, many areas will appear dull and unattractive to customers. We would hazard that red is the most common shopfront advertisement colour in any given street. Local authorities should only concern themselves with colour that is so obtrusive that it affects visual amenity (as req. by the regulations). How will a local authority enforce this? Any deemed consent or accepted advertisement may be displayed regardless of its colour. This would include the vast majority of non-illuminated fascia, hanging and window signs, including those in Conservation Areas. We therefore suggest that the general advice on colour be deleted entirely.	No change proposed. The guidance does not preclude the use of colour or even bright colour, but rather “excessive use of bright colour or fluorescent colours.” Bright colours may be deemed appropriate on a case-by-case basis when determining planning applications depending on the frontage itself and the surrounding area.
Historic England	Paragraph 4.10	Internally illuminated lettering is never necessary, but rather halo-lit letters or external illumination should be used.	Noted. No change proposed. This is detailed in paragraph 4.41 and is stated in the Local Plan.
Historic England	Paragraph 4.10	Use of fluorescent colours need not be entirely avoided but rather its use should be carefully considered and restrained. Perhaps limit the hours of illumination. Painting joinery bright fluorescent colours is inappropriate.	Noted. Change proposed to “avoid excessive use of bright or fluorescent colours” rather than to avoid entirely.

Name	Document ref (consultation version)	Representation	Council Response
Conservation Area Advisory Committee (CAAC)	Paragraph 4.14	There should be a requirement that the house number be displayed on the fascia or other suitable position as the RBC ‘Street Naming and Property Numbering Protocol.’	Change proposed.
British Sign and Graphic Association (BSGA)	Paragraph 4.16	The content and design of an “A” board on a private forecourt (provided the board complies with the conditions in Class 6, Schedule 3, Part 1, to the Regulations) is not a matter for the local authority. We suggest that the second sentence be re-drafted as: “These may be appropriate within a private forecourt and are permitted by the Advertisements Regulations subject to certain restrictions on size and content.”	The language makes clear that these may be appropriate within a private forecourt. Change proposed to refer to Advertisements Regulations guidance.
British Sign and Graphic Association (BSGA)	Paragraph 4.18	This should be re-drafted to reflect the advice in the Local Plan, e.g. that “high level signs are particularly prominent, and care should be taken to avoid detrimental effects on visual amenity.”	Change proposed.
Historic England	Paragraph 4.18	Is this justified? Plenty of Victorian and Edwardian shopfronts had high level signage (for example, sixth-storey tile signage at McIlroy’s department store).	Change proposed to reflect that care should be taken to avoid detrimental effects on visual amenity.
Historic England	Paragraph 4.19	Is external illumination ok?	Change proposed to state that modest external illumination may be appropriate.
Historic England	Paragraph 4.20	Set a limit on how much wall space can be covered by these. This can then be used to justify enforcement to remove.	Change proposed to clarify that temporary signage should never occupy more than 30% of the frontage.

Name	Document ref (consultation version)	Representation	Council Response
Cook, Tim	Paragraph 4.22	Does the shop have disability access? Can you also see if you can get information to the shops on how to help get more disabled access to shops, such as ramps? This may mean loans or financial assistance.	Change proposed to encourage use of ramps. It is not within the scope of this SPD to work with individual shopowners to create improvement to access, but this will be assessed when planning applications come forward.
Conservation Area Advisory Committee (CAAC)	Paragraph 4.25	Forecourt display of goods (trading) should be clearly differentiated from forecourt seating. Our assumption is that forecourt seating in cafes/restaurants in Conservation Areas would be acceptable as is the case now. Forecourt trade bins are a problem which should be highlighted here.	It is not considered that display of goods should be clearly differentiated from forecourt seating as both should be subject to visual amenity guidance. Change proposed to include reference to bins located in forecourts.
Historic England	Paragraph 4.25	What about use for parking (including collections), bin storage and temporary structures?	Change proposed to refer to bin storage. Paragraph 4.29 clearly states that it is not appropriate to park vehicles on forecourts or pavements. Detailed guidance regarding temporary structures and verandahs has been added to paragraph 4.30 to 4.33.
Beardmore, Alex	Paragraph 4.26	Shopfront windows framed in bronze or stainless drawn metal sections or polished decorative hardwood have been lost and replaced by inferior painted frames which quickly deteriorate and peel. The document should consider the importance of framing.	Change proposed. Language has been added to this section to include further detail.

Name	Document ref (consultation version)	Representation	Council Response
Conservation Area Advisory Committee (CAAC)	Paragraph 4.26	Insert 'traditional' between 'high' and 'quality' as we assume that is what is meant here. Maybe some examples of what would be acceptable as well as what is not acceptable? "High-quality" should be clearly defined.	<p>High quality does not necessarily mean traditional, as modern shopfronts with innovative designs can contribute greatly to the streetscene.</p> <p>Change proposed to add more detail to describe what would be acceptable and that each application will be considered on a case-by-case basis.</p>
Cox, Robert	Paragraph 4.26	My impression from the photographs was that traditional materials - wood, brick, glass, tiles and so on - would be preferred. While I understand this emphasis, I hope that the door is left open for the use of other materials, such as aluminium, steels, plastics, double glazing and so on as they can have thermal, weight, cost and lifetime advantages. They only need to be used in a sympathetic manner with appropriate finished and colour. One other important point is workmanship. Even using the most expensive materials can look shabby if the work is not cleanly and accurately executed.	Change proposed to add more detail to describe what would be acceptable and that each application will be considered on a case-by-case basis.
Historic England	Paragraph 4.26 - 4.28	Weathered bronze and chrome with black vitriolite is a good option. Clarify what is meant by "reflective." Glass is reflective. Gold leaf could be described as reflective or metal but may be high quality. Softwood deteriorates rapidly. Removal of paint to restore brickwork must be done carefully to avoid damaging the 'fireface' of the brick beneath. 94 Broad Street is a good example in addition to properties on Queen Victoria Street.	Changes proposed.

Name	Document ref (consultation version)	Representation	Council Response
Unsworth, Elizabeth	Paragraph 4.29	“At ground level only” is unclear. Is it the intention that they should only be fitted at ground floor level?	Change proposed.
Historic England	Paragraph 4.29	Is “more than one structural bay” the right term?	Change proposed to refer to corbels.
British Sign and Graphic Association (BSGA)	Paragraph 4.30	Blinds with lettering are “advertisements” and, provided they comply with the relevant conditions, may usually be displayed with deemed consent under the provisions of Class 5 in Schedule 3, Part 1, to the Regulations. In such cases, planning permission is also deemed to be granted for the blind under section 222 of the Town and Country Planning Act 1990. This paragraph should be deleted.	No change proposed. This paragraph states that blinds with lettering “will likely” require advertising consent. This encourages applicants to ensure that the correct permissions have been secured. It does not prevent blinds with lettering permitted under deemed consent.
Conservation Area Advisory Committee (CAAC)	Paragraph 4.30	We suggest that if only the information is shown on the fascia is repeated on the blind/awning so that it is visible when the fascia is obscured.	No change proposed. This is considered too prescriptive and each application (if consent is required) will be considered on a case-by-case basis.
Historic England	Paragraph 4.30	Blinds with lettering should not necessarily be discouraged. Are there examples of suitable lettering styles?	No change proposed. This is not intended to discourage blinds with lettering
Conservation Area Advisory Committee (CAAC)	Paragraph 4.32	Security shutters are sometimes installed as an immediate response to a break-in. Thames Valley Police Guidance is here: https://www.thamesvalley.police.uk/cp/crime-prevention/keeping-business4safe-from-crime/keep-burglars-out-business/ Business insurance guides also suggest measures that this SPD would not recommend or allow.	This paragraph does not preclude security shutters, but rather encourages laminated glass and other less invasive measures in the first instance. Change proposed to refer to the Thames Valley Police Guidance.

Name	Document ref (consultation version)	Representation	Council Response
Shook, Ryan	Paragraph 4.32	This section addresses security shutters. Figure 48 is a great example of how terrible they are. I think it would be valuable to expand this section a bit and include an example or two of roller shutters done well. Three phone shop, Schuh and JD Sports are possible examples.	Changes proposed to provide reference to Police guidance, as well as include a photo of a shopfront with discreet security shutters.
Shook, Ryan	Paragraph 4.32	Please have a quick read of the planning decision for application 201755 and note the references to security. Can/should the Design Guide address these security concerns head on?	No change proposed. With the adoption of this SPD, planning officers will be able to require applicants to pursue laminated glass or internal shutters in the first instance.
Conservation Area Advisory Committee (CAAC)	Paragraph 4.33	Most shops trade after dark in winter.	Change proposed to refer to “when shopfronts are trading after dark.”
Unsworth, Elizabeth	Paragraph 4.33	This point makes reference to conservation areas, but there is not further information. Conservation areas should be defined and applicants should be directed to more information.	Change proposed to define conservation area in the glossary.
Historic England	Paragraph 4.34	Do you mean internally illuminated? The occasional neon sign during can be attractive.	Change proposed to state “illuminated projecting or hanging signs on the exterior of the building are usually not appropriate.”
Historic England	Paragraph 4.35	Evening lighting of shop window displays can add to the vibrancy of the town centre, particularly in winter months. This should be encouraged, particularly when energy-efficient LED lighting is used.	Change proposed.

Name	Document ref (consultation version)	Representation	Council Response
Unsworth, Elizabeth	Paragraph 4.41	<p>“Where a historic or traditional shopfront exists, consent will not be granted for its removal. All original elements and materials are expected to be retained and sensitively restored.” There is no mention in this document of the MEES Regulations (which originate from the Energy Act 2011) and apply a new legal standard for minimum energy efficiency for rented commercial buildings from April 2018. There is a possible conflict between this SPD and the MEES regulations which could make it difficult to comply with the requirement quoted above.</p>	<p>Noted. Change proposed. Additional information regarding Sustainable Design and Construction and energy requirements has been added to new paragraph 4.7.</p>

Name	Document ref (consultation version)	Representation	Council Response
British Sign and Graphic Association (BSGA)	Paragraph 4.59	<p>This is unduly restrictive. While we accept that the use of high-quality materials is to be encouraged, this does not automatically exclude plastics and acrylics. These are also high-quality materials and are in common use on modern advertisements. And these materials can be finished to be matte in appearance and opaque. Plastic materials used in the sign industry today are high quality, recyclable and can be produced in a variety of finishes. They can be wholly sympathetic to modern shopfronts which may also have uPVC window and door framing and other modern design elements. Some of the signs most commonly seen in historic areas are also necessarily at least part acrylic or Perspex. They are suitable materials for the faces of letters and graphics illuminated from within. And “glossy” can equally apply to “gloss” paint on wood. We think that this paragraph might be better expressed as: “High quality materials should be used to support the overall character. Avoid the use of large areas of glossy acrylic, plastic and Perspex sheeting which can spoil the character of historic areas where more traditional materials are prevalent.”</p>	Change proposed.
Cook, Tim	Paragraph 4.60	<p>Does the shopfront have neon advertising during the night? What time do they turn off to reduce the environmental impact? Is the night-time advertising continuing beyond 10 pm?</p>	<p>The environmental impacts of night-time advertising are not within the scope of this document, although there is some guidance provided to ensure that these do not detract from local amenity. All illumination must comply with Policy OU4 of the Local Plan.</p>

Name	Document ref (consultation version)	Representation	Council Response
Shook, Ryan	Paragraph 4.63	This states “Exterior security shutters should be avoided on listed buildings or within conservation areas in favour of laminated glass.” Can this use stronger language than “should” for listed buildings and conservation areas or is it just a duplication of 4.32?	Noted. It is considered that some flexibility may be needed in rare circumstances depending on security needs, thus “should” has been used. Each application will be considered on a case-by-case basis to ensure that exterior shutters are avoided on listed buildings and within conservation areas.
British Sign and Graphic Association (BSGA)	Paragraphs 4.14 and 4.15	This ignores the artistic principle of “thirds.” The suggesting that the text should be of a certain height and length (halves) is far too simplistic. We suggest the advice be limited to scale, i.e. that the text should be in proportion the dimensions of the fascia. What the text depicts (and whether it contains a motif) is not a matter which generally concerns the Council (because the Advertisements Regulations do not permit control of “content” of a sign unless it directly affects visual amenity). Paragraph 4.15 therefore has no legal basis whatsoever and should be deleted entirely.	No change proposed. The text clearly states these proportions can be used “as a guide.”

Name	Document ref (consultation version)	Representation	Council Response
British Sign and Graphic Association (BSGA)	Paragraphs 4.19 and 4.34	These paragraphs exceed the requirements of the Local Plan. What is a “small” projecting sign? And why should internal illumination be unacceptable? “Small” should be deleted in favour of scale; and internal (and external) illumination through letters only should be just as acceptable as similarly designed fascia signs. We suggest that the paragraph be deleted and replaced with: “One projecting/hanging sign per shopfront will generally be acceptable. Any such sign should be in scale with the premises’ façade as a whole and should not give the appearance of bulkiness. Internal (letters-only) or discrete external illumination will usually be acceptable.”	Partial change proposed. Preference for external illumination retained as internal illumination is more likely to negatively affect amenity. Each application will be considered on a case-by-case basis.
Carter, Alice	Paragraphs 4.21 and 4.22	I am concerned that planning permission may be required to install an access ramp. This should be unrestricted to encourage full access. Is planning permission required for permanent or temporary, removable ramps? This needs to be clear. Many shops don’t bother with removable ramps even though they cost as little as £30.	Change proposed to clarify that most permanent ramps require planning permission while temporary and removable ramps do not.

Name	Document ref (consultation version)	Representation	Council Response
Carter, Alice	Paragraphs 4.21 and 4.22	The document should include more case studies to illustrate how to make listed buildings accessible. Accessibility is listed as one of the three priorities for Reading, but there is very little in the document about how to achieve accessibility and lots of information about maintaining historic features that often impede access such as steps, recessed entrances, historic entrances, etc. I appreciate that not all historic buildings can be made accessible by history should not trump accessibility. This document seems to emphasise preserving historic features over accessibility. Page 29 refers to “reasonable accessibility and maintaining historic interest.” This frames historic interest as just as or more important than accessibility.	Changes proposed to emphasise that accessibility should be an important priority for all applicants and to provide examples of appropriate interventions. The changes proposed also seek to avoid privileging historic interest over accessibility. Document now refers to specific Historic England advice regarding accessibility and historic buildings.
Conservation Area Advisory Committee (CAAC)	Paragraphs 4.32 and 4.63	We are aware of some traditional use of shutters in fishmongers’ shops that are open to the street during the day to secure the shop at night.	Noted. No change proposed.
Conservation Area Advisory Committee (CAAC)	Paragraphs 4.39 and 4.40	Residential use of the upper floors of a shopfront must comply with fire regulations. In relation to this SPD, what guidance can RBC provide?	It is not within the scope of this document to provide guidance with regard to fire regulations.
Conservation Area Advisory Committee (CAAC)	Section 5	Taking the examples mentioned above (former pubs, banks, conversions from residential) retaining existing or original shopfront features would appear anachronistic or anomalous. These units should be dealt with on a case by case basis which allows the building to tell its story.	Change proposed to clarify that each application will be dealt with on a case-by-case basis.

Name	Document ref (consultation version)	Representation	Council Response
Conservation Area Advisory Committee (CAAC)	Appendix 1	The last row of the second table is unclear.	Change proposed to refer to a solid visual base such as a stallriser.
Conservation Area Advisory Committee (CAAC)	Figure 17	Could this be replaced by 103 London Street (although the fascia is not in keeping)?	It is considered that this is a better example as the fascia is in keeping.
Conservation Area Advisory Committee (CAAC)	Figure 21	Unfortunately, Jackson's Corner doorway is no longer recessed.	Noted. This photograph is intended to illustrate elements of an Edwardian shopfront, even though it is unfortunate that the recessed doorway has been lost.
Conservation Area Advisory Committee (CAAC)	Figure 24	Marks and Spencers is a good example, but Harris Arcade (Art Deco) could be included, as well.	Change proposed.
Conservation Area Advisory Committee (CAAC)	Figure 30	SPD should stress that Wendy's is a good example.	Change proposed to emphasise this in the caption.
Conservation Area Advisory Committee (CAAC)	Figure 31	'Silicon' should be 'silicone.'	Change proposed.
Conservation Area Advisory Committee (CAAC)	Figure 40	Caption is incorrect.	Change proposed to remove reference to bank machine.
Conservation Area Advisory Committee (CAAC)	Figure 41	Reason for inclusion of this image of The Horn should be stated in the caption.	Change proposed to highlight the value of the historic fascia and hanging sign.
Conservation Area Advisory Committee (CAAC)	Figure 44	Is this meant to be a good example of the use of brick?	Yes. Change proposed to only refer to brick and remove reference to stallrisers, which are not depicted in this image.

Name	Document ref (consultation version)	Representation	Council Response
Conservation Area Advisory Committee (CAAC)	Figure 52	It is likely that this entrance is secured at night with a grille to prevent use of the entryway.	No change proposed. This is unknown, but earlier text refers to guidance that grilles may be used in the evenings to prevent use of entryways provided they retain visibility.
Conservation Area Advisory Committee (CAAC)	Figures 15 and 16	Captions are not accurate.	Change proposed to state “Victorian” rather than “inter-war.”
Conservation Area Advisory Committee (CAAC)	Figures 6 and 44, 22 and 45	These are repeated. It would be better to include once with a detailed reference.	Change proposed to remove figure 6 and figure 22 removed to avoid duplication.