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Subject: Heritage Action Zone – Great Yarmouth Shopfront Design Guide Supplementary Planning Document

Report to: Policy and Resources Committee – 12th July 2022

Report by: Sam Hubbard, Strategic Planning Manager

SUBJECT MATTER

Heritage Action Zone – Adoption of the Great Yarmouth Shopfront Design Guide Supplementary Planning Document.

RECOMMENDATION

That Policy and Resources Committee adopts the attached Shopfront Design Guide Supplementary Planning Document.

1. Introduction

- 1.1. In January 2020 it was announced that GYBC was one of 68 high streets which had made a successful bid for a Heritage Action Zone. Under the scheme, lead partners and Great Yarmouth Preservation Trust (GYPT) will work with Historic England (HE) to develop and deliver schemes that will transform and restore disused and dilapidated buildings into new homes, shops, workplaces and community spaces, restoring local historic character and improving public realm. The Great Yarmouth Heritage Action Zone (HAZ) target area includes Market Place, King St and Market Row
- 1.2. The scheme comprises a series of projects and workstreams which collectively tackle problems of empty, redundant and neglected buildings through repair and re-use, transforming dilapidated properties into new homes, shops and community spaces. The project includes a number of physical improvements to the historic environment, a mapping project, community engagement and the preparation of design guides.
- 1.3. The design guides will cover shopfronts, extensions, repairs and public realm.
- 1.4. The first design guide to be prepared is the Shopfront Design Guide. The guide will help support the grant system for shopfront repairs and renovations but will also be a planning policy document to help determine applications involving shopfronts. Therefore, it is proposed that that the document is adopted as a Supplementary Planning Document (SPD).
- 1.5. SPDs build upon and provide more detailed advice or guidance on policies in an adopted local plan. They do not form part of the 'development plan' but are a material consideration in the

determination of planning applications. The SPD provides broad design principles for shopfronts as well as a detailed analysis of the separate design elements which make up a shopfront. This includes advice and guidance on signage, illumination, colour, materials, pilaster, console brackets, stall riser windows etc.

- 1.6. The Town and Country Planning (Local Planning) Regulations 2012 require two stages of consultation during the preparation of a SPD. Firstly, consultation is required during the initial preparation of the document to inform a draft SPD and secondly on a final draft SPD.
- 1.7. The Policy and Resources Committee approved a first draft of the SPD on 27th July 2021 which formed the first stage of consultation. Consultation then took place between 9th August 2021 and 20th September 2021. Consultation on a Final Draft of the SPD took place between 14 February 2022 and 13 March 2022.
- 1.8. A Consultation Statement has been prepared and is appended to this report as Appendix 1 which includes the responses received at both stages of consultation and how they have been addressed in the final version of the Supplementary Planning Document.

2. Final SPD for Adoption

- 2.1. A final version of the Shopfront Design Guide SPD is appended to this report in Appendix 2. The final version of the SPD takes into account the comments received during the consultations. In summary the main changes from the final draft which was consulted on in February and March are amendments to improve the clarity of the guidance with respect to materials and fascia and reference to Norfolk County Council's Safe, Sustainable Development document with regard to awning heights.

3. Financial Implications

- 3.1. No implications. The preparation of the SPD has been funded from the Heritage Action Zone budget

4. Risk and Legal Implications

- 4.1. The risks in adopting the SPD are limited. The powers to prepare an SPD are outlined within the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) Regulations 2012 and the process of preparing the SPD has been in line with these regulations.

5. Conclusion

- 5.1. The Shopfront Design Guide forms part of the Heritage Action Zone programme of work. It will help support the shopfront grant system and will be a material consideration in planning applications involving shopfronts upon adoption.
- 5.2. It is recommended that Policy and Resources Committee adopt the Shopfront Design Guide Supplementary Planning Document included in Appendix 2.

6. Appendices

Appendix 1 – Consultation Statement

Appendix 2 – Final Shopfront Design Guide Supplementary Planning Document

Areas of consideration: e.g. does this report raise any of the following issues and if so, how have these been considered/mitigated against?

Area for consideration	Comment
Monitoring Officer Consultation:	n/a
Section 151 Officer Consultation:	n/a
Existing Council Policies:	Local Plan Part 1: Core Strategy, Local Plan Part 2.
Financial Implications (including VAT and tax):	n/a – covered by usual staff operating costs.
Legal Implications (including human rights):	n/a
Risk Implications:	n/a
Equality Issues/EQIA assessment:	n/a
Crime & Disorder:	n/a
Every Child Matters:	n/a

Great Yarmouth Shopfront Design Guide

Supplementary Planning Document

Consultation Statement

July 2022



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Introduction

This document provides a summary of the consultation undertaken on the Great Yarmouth Shopfront Design Guide (SPD). It summarises the consultation undertaken at the initial stages of preparation and the representations made on the final draft of the SPD under regulation 13.

Summary of Consultation during the preparation of the SPD

This section provides a summary of the consultation undertaken on the Great Yarmouth Shopfront Design Guide (SPD) under Regulation 12 of the Town and County Planning (Local Planning) Regulations 2012 (as amended). It provides the information required under Regulation 12 of the above mentioned regulations. The section sets out:

- Which bodies and persons the local planning authority invited to make representations under regulation 12,
- How those bodies and persons were invited to make representations under regulation 12,
- A summary of the main issues raised by the representations made pursuant to regulation 12,
- How these representations have been taken into account in the production of the Final Draft SPD

The initial consultation took place between 9th August 2021 and 20th September 2021.

In accordance with the Councils adopted Statement of Community Involvement (SCI), direct notification of the consultation was sent to:

- All Local Members
- Statutory and General Consultees on our Local Plan consultation database

A press release for the consultation was issued on the 19th August 2021.

The consultation itself was in the form of a first draft of the SPD. The document was available online and hard copies were available for inspection at the Town Hall, Hall Plain, Great Yarmouth, NR30 2QF

Comments to the consultation were accepted via post to Great Yarmouth Town Hall or email to localplan@great-yarmouth.gov.uk. An interactive survey was also made available for people to submit their comments.

The consultation attracted responses from 8 individuals or organisations. These responses are reproduced in Appendix 1. The main issues raised in the response together with how they have been addressed in the production of the Final Draft SPD is set out below.

Summary of main issues raised and how they have been addressed

This section sets out the main issues raised by each respondent and how they have been taken into account in the Final Draft SPD.

Respondent: British Sign and Graphics Association - Chris Thomas – Outdoor Advertising Consultant.

Summary of Main Issues Raised

The British Sign and Graphics Association raised the following issues:

- It was argued that the SPD should only apply to historic buildings and historic areas and this should be clarified in the introduction. It was stated that the title of the guidance should be Shopfront Design Guide for Historic Buildings and Areas.
- Concern was raised around the way the guidance treats uvpc, acrylic and Perspex and other plastic materials. Suggested wording was provided.
- Concern was raised on how the guidance emphasises transparency in window displays and guidance on advertisement displays on windows. Noted that the Advertisements Regulations permit advertisements within buildings.
- It was noted that the guidance to avoid internally illuminated box fascias is a common type of approach on contemporary shopfronts and the guidance fails to take into account innovation in lighting which allows for slimmer signage. Suggested wording was provided.
- It was argued that the guidance on colour should be deleted as it is a commercial consideration and would often not need planning permission and therefore the local authority could not enforce it.
- It was suggested that the section on signage should be deleted or rewritten entirely. Concerns included lack of planning control over what can be on an advertisement, guidance on types of paint, guidance on approach to signwriting.
- It was suggested the section on illumination was deleted with concern raised about guidance on external illumination, the definition of subtly and high quality. It was argued that internally illuminated fascia

How issues have been addressed

It is considered that the introductory paragraphs are sufficiently clear that the SPD provides guidance for shopfronts in historic areas and on historic buildings.

The section on materials has been revised to address the concerns raised with similar wording used to that suggested by the respondent.

In terms of concerns about what is controllable under planning legislation, new wording has been added to the introduction to make clear that where planning permission is not needed for an alteration, the Council would still encourage shop owners and developers to follow the guidance in order to improve the character of the area.

The references to transparency have been revised slightly to give greater clarity to the guidance.

The section on illuminated facias has been revised to take into account comments. However, given that the document is focussed on historic areas and buildings it is appropriate that it still seeks to avoid illuminated box facias more generally.

It is considered important for the document to have guidance on colour and signage even in circumstance where it is not subject to control by the local planning authority in order to promote best practice in the historic environment. The sections on colour and signage has been revised to make them more specific and clearer.

It is not the Council's intention to restrict illumination to the interior of buildings. The first paragraph in the illumination section simply states that this was a traditional approach. The wording has been revised to be more specific on appropriate approaches.

Respondent: Great Yarmouth Civic Society

Summary of Main Issues Raised

Great Yarmouth Civic Society supported the SPD. They noted that there was no guidance on how the floor in the area leading up to shopfront doors should be treated. They also requested mention of the importance of good looking and safe pavements.

How issues have been addressed

Support noted. There is guidance on access and doorways on page 32 of the guidance.

Respondent: Great Yarmouth Local History and Archaeological Society

Summary of Main Issues Raised

The Great Yarmouth Local History and Archaeological Society noted that the SPD was a very good and comprehensive guide.

How issues have been addressed

Support for the SPD noted.

Respondent: Historic England

Summary of Main Issues Raised

Overall, Historic England strongly welcomed the production of the guidance.

More specifically Historic England raised the following issues:

- It was noted that the document neglects to provide sufficient information regarding stylistic influences other than Classical and the broader evolution of style and form from the earliest shopfronts to the Modernism of the post-war period
- It was requested that more information could be provided regarding the use of materials including recommendations on timber selection and paint types.
- It was requested that there was specific advice in the SPD on how to accommodate access to upper floors in a frontage.
- It was requested that references to the NPPF were made in the SPD.
- It was suggested that Historic England's advice regarding the repair, maintenance and upgrading of traditional windows is referenced.

How issues have been addressed

The document has been re-ordered so that the section on the history of shopfronts comes before the section on classical architecture. The section on the history of shopfronts has been expanded to address comments on stylistic influences other than classical architecture.

Reference has been made to the document "Details and Good Practice in Shopfront Design" as a reference point for more information and detail on material usage.

Detail has been added to the document providing guidance on access to upper floors.

Reference has been made to the NPPF in Appendix C.

Reference had been made Historic England's Traditional Windows: Their Care, Repair and Upgrading (Historic England, 2017) in Section 3.

Respondent: Marine Management Organisation

Summary of Main Issues Raised

No specific issues raised, only standard holding response provided.

How issues have been addressed

No issues to address

Respondent: Natural England

Summary of Main Issues Raised

Natural England concluded that the SPD was unlikely to have major impacts on the natural environment and therefore did not provide any specific comments.

How issues have been addressed

Comment and conclusions noted.

Respondent: Miss K Newnham (Member of public)

Summary of Main Issues Raised

Miss Newnham supported the publication of the SPD.

How issues have been addressed

Support noted.

Respondent: Norfolk County Council

Summary of Main Issues Raised

Norfolk County Council expressed support for the SPD which they considered would help improve the vitality of the town centre. They did not consider there were any strategic cross-boundary issues.

How issues have been addressed

Support for document noted.

Summary of consultation on Final Draft SPD

This section provides a summary of the consultation undertaken on the Great Yarmouth Shopfront Design Guide (SPD) under Regulation 13 of the Town and County Planning (Local Planning) Regulations 2012 (as amended). The section sets out:

- Which bodies and persons the local planning authority invited to make representations under regulation 13,
- How those bodies and persons were invited to make representations under regulation 13,
- A summary of the main issues raised by the representations made pursuant to regulation 13,
- How these representations have been taken into account in the production of the Final SPD

The consultation took place between 14 February 2022 and 13 March 2022.

In accordance with the Councils adopted Statement of Community Involvement (SCI), direct notification of the consultation was sent to:

- All Local Members
- Statutory and General Consultees on our Local Plan consultation database

The draft SPD was available online and hard copies were available for inspection at the Town Hall, Hall Plain, Great Yarmouth, NR30 2QF

Comments to the consultation were accepted via post to Great Yarmouth Town Hall or email to localplan@great-yarmouth.gov.uk.

The consultation attracted responses from 4 organisations. These responses are reproduced in Appendix 2. The main issues raised in the response together with how they have been addressed in the production of the Final SPD is set out below.

Summary of main issues raised and how they have been addressed

This section sets out the main issues raised by each respondent and how they have been taken into account in the Final Draft SPD.

Respondent: British Sign and Graphics Association - Chris Thomas – Outdoor Advertising Consultant.

Summary of Main Issues Raised

The British Sign and Graphics Association raised the following issues:

- Requested that the name of the document should be changed to make clear it applies to historic buildings and areas.
- Raised concern that the guidance includes elements which go beyond what is permitted in law.
- Objected to the guidance on the use of plastic and laminates as a material in shopfronts
- Questioned why traditional materials should be used in contemporary designs.
- Raised concern with the interpretation and meaning of the advice on fascia.
- Objected to the guidance which advises against boxed fascia signs.
- Objected to the strictness of the advice about corporate signage.
- Raised concern that the guidance on colour was onerous and in some cases unenforceable.
- Raised concern that the guidance on signage was onerous and unachievable.
- Objected to the guidance on hanging signs stating the advice was impractical given the need for headroom.
- Questioned why gloss paint should be avoided.
- Objected to the guidance which states internally illuminated signs and lettering should be avoided.
- Raised concern that the case-studies emphasise misplaced preconceptions elsewhere in the document.
- Raised concern that the bibliography does not contain a study on modern retail trends.

How issues have been addressed

It is considered that the introductory paragraphs make clear that the document applies to historic buildings and areas. Therefore, this does not need to be repeated in the title of the document.

The introductory section of the document makes clear that some interventions covered by the guidance may not require planning consent. However, the guidance is still considered helpful and the Council still encourages shop owners and developers to have regard to the guidance in this SPD in order to help improve the character of the area.

The SPD does not require contemporary shopfronts to use traditional materials. Changes to the text have been made to make this clearer.

The use of plastics as a material is not considered appropriate to the character of the conservation area. With regard to laminates the text has been amended to make clear it is only plastic laminates which should be avoided.

The section on fascia has been revised to improve the clarity. Box fascia signs and internally illuminated fascias are not considered appropriate in the conservation areas and therefore this guidance has been retained in the document. The wording on corporate signage has been amended to address concerns.

The guidance on colour is considered necessary to help improve the overall appearance and integrity of the conservation areas. As stated above, it is acknowledged in the document that some elements of the guidance apply to alterations which do not require consent.

The guidance on fascia signage is considered appropriate for the conservation area which has numerous examples of lettering painted onto the fascia. Furthermore, it is consistent with many other shopfront design guides for historic areas produced by other local authorities. With regard to hanging signage, reference to the height has been removed. The reference to gloss paint complements the wider guidance on avoiding shiny, reflective finishes.

The case studies are considered helpful and support the guidance found elsewhere in the document. The SPD is concerned with the design of shopfronts in historic areas rather than wider retail planning policy. Therefore, it is not considered necessary to reference studies on modern retail trends.

Respondent: Marine Management Organisation

Summary of Main Issues Raised

No specific issues raised, only standard holding response provided.

How issues have been addressed

No issues to address

Respondent: Norfolk County Council – Lead Local Flood Authority

Summary of Main Issues Raised

Stated that for properties located in areas at risk of flooding from any source it is recommended that flood resilient design solutions are incorporated into the proposals. The Lead Local Flood Authority also made reference to their guidance.

How issues have been addressed

Flood resilience is considered outside the scope of this design guide which focuses on the design of shopfronts in historic areas rather than more extensive renovations and alterations where flood resilience may be necessary.

Respondent: Norfolk County Council

Summary of Main Issues Raised

Norfolk County Council supported the design guide. They suggested referring to the County Council's Safe, Sustainable Development document with regard to shopfront heights and lighting.

How issues have been addressed

Minimum awning heights have been amended to reflect the Safe, Sustainable Development document. The Safe, Sustainable Development has been referenced in the bibliography.

Appendix 1 – Full Text Comments from Initial Consultation

Respondent: British Sign and Graphics Association - Chris Thomas – Outdoor Advertising Consultant.

These representations are submitted on behalf of the British Sign and Graphics Association (BSGA) in response to the above draft SPD.

The BSGA represents 65% of the sales of signage throughout the UK and monitors development plans throughout the country to ensure that emerging Local Plan Policies and Supplementary Guidance do not inappropriately apply more onerous considerations on advertisements than already apply within the NPPF, Planning Practice Guidance (PPG) and the Town and Country Planning (Control of Advertisements)(England) Regulations 2007 (as amended). Our comments relate to the parts of the SPD which concern “advertisements” in the statutory definition.

The Introduction to this draft SPD explains that its additional guidance on the design of shopfronts and advertisements is relevant to designated conservation areas and for proposals relating to listed buildings and other designated national and local heritage assets. We think that the title should make this crystal clear, ie the SPD should be called “Shopfront Design Guide for Historic Buildings and Areas”. The Introduction should make very clear that the guidance is not intended for borough-wide application. The addition of paragraph numbers would also help in referencing.

We have now 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 Great Yarmouth’s shopping environment; and that its requirements are unduly onerous and excessive.

In chapter 7 “Design Principles”, page 25, the use of high quality materials is encouraged. But the paragraph then continues to denigrate uPVC, acrylics, Perspex and other plastics as if they are not high-quality materials (“Perspex” is a registered trade name and needs to be capitalized). The paragraph says that they are “unsympathetic”, but fails to explain how. 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. 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”.

This change would also reflect the advice on “Materials” on page 36.

In chapter 8, “Window Displays”, page 30, (and in “Design Principles”, page 27), there is an emphasis on “transparency” between street and the building interior as if this is automatically desirable. This is an incorrect presumption. There are many good reasons why a particular business may require part or all of its windows to be obscured (eg 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 (eg 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. The content of shop windows is a matter for the owner/occupier and not one for the local authority. All the SPD advice is based on the misconception that the authority knows best – it doesn't. This is a commercial consideration which is not the local authority's business.

In Chapter 8, "Fascia", page 30, the SPD advises that internally illuminated box fascias should be avoided. This fails to reflect the reality that internal illumination is the most common form of fascia sign within the town centre, particularly on properties with contemporary shopfronts. The SPD fails to take account of innovation in sign design. In particular, there is no mention whatsoever of LED illumination. The smaller size of the luminaries, their long

life and their minimal heat generation allows modern "box" signs to be much slimmer and more versatile than their "neon" tube illuminated predecessors. These older signs needed thickness in the depth of the box to allow for the bulkier tubes and their fittings, as well as to allow heat to dissipate. Moreover, the SPD fails to recognise that internal illumination allows light to be very carefully directed (eg through letters/logo only), whereas external illumination necessarily casts light not only onto the sign but also its surrounds. It also often produces an uneven light spread which is itself unsatisfactory both for the retailer and the street scene (see picture below). We suggest that the advice be revised to:

"Bulky, box-type fascias, often with full-face illumination and crudely bolted-on over existing fascia boards, should be avoided."

In Chapter 8 "Colour", page 37, we accept that some historic shopfronts may need to be coloured sensitively. However, the advice that "In general, particularly bright colours or a selection with too high contrast should be avoided" is overly prescriptive for general application throughout the borough. What is a "bright" colour? Red or yellow? But these are two of the primary colours of nature and are commonly seen throughout shopping areas. Without bright colours, many commercial areas would be dull, uninteresting and unattractive to customers. We would hazard that red is the most common shopfront advertisement colour in any given street. And what is "too high" contrast? Red and yellow? Red and white? Red and blue? Green and yellow? (think McDonald's, Burger King, Tesco, Morrisons). Again, colour is a commercial consideration. Local authorities should only concern themselves when the colour is so obtrusive that it affects visual amenity (as required by the Regulations). Otherwise, this is again a matter for personal choice, as indeed it should be. And how will a local authority enforce this? Any deemed consent or excepted 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. So the "advice" cannot be enforced. We therefore suggest that the "general" advice on colour be entirely deleted.

In Chapter 8 "Signage", page 38, the advice is totally unrealistic. That fascia signs should use "traditional hand-painting" is unachievable. There are not enough professional sign writers still practising in the UK to supply even Great Yarmouth's commercial offerings. And the price is prohibitive.

Acceptable fascia signage can be in a very wide range of forms and designs. Individual letters can be fitted even when there is an existing fascia board. Signs can be in a variety of materials to suit the style of the shopfront and/or building. A "traditional hand-painted" fascia board would look wholly

out of place above a modern metal or plastic-framed shopfront with large plate-glass windows.
Modern, slim, internally

illuminated fascias can be wholly acceptable (see above). The advice is pointless and unrealistic. It should either be expanded widely or, probably best, replaced simply with:

“Fascia signs come in all sizes and materials. The advice on “Fascia” above is relevant. The fascia should be in scale with the shopfront and building as a whole, as should advertising upon it. Design will vary widely. But the important consideration is that the overall appearance of the fascia should complement the character and design of the shopfront as a whole and, where appropriate, the building of which it forms a part.”

It should also be borne in mind that local authorities may not concern themselves with the content of a sign unless it affects amenity or public safety in any particular case. The SPD cannot therefore dictate that the content of any sign be only the shop name or, for that matter, anything else. For example, there is nothing to prevent a greengrocer’s fascia sign from saying “pharmacy”. This is a ridiculous example because commercial consideration would never permit it – but the law would! So references to fascias or letters with the shop name only should be deleted.

In the third paragraph of the same section, the Council apparently fail to recognize that the advice is supposedly about “Signage”. A hanging “sign” is an advertisement! It does not need to contain words or a logo – a model of a shoe hanging outside a shoe shop is an “advertisement” within the statutory definition. And why should these be at, or below, fascia level? Such signs must leave adequate headroom for public safety - a hanging sign below fascia level would often not permit this. And a hanging sign fixed to a fascia can spoil the fascia. It is for this reason that many hanging signs are displayed from brackets set above the fascia. The board may then be seen safely and clearly either at the same height as the fascia or wholly above (as often in the case of public houses).

Why should “gloss” paint be avoided? Most people paint the woodwork/metalwork of their homes in gloss paint for a reason. It wears well, does not readily discolour and gives a pleasing finish. Matt paints can appear dull and never weather as well. This advice has no sound basis and is unenforceable; again, the matter should be left to personal choice.

We suggest that the whole “Signage” section should either be deleted or re-written entirely – at present, it is gibberish.

In chapter 8 “Illumination”, page 38, it appears that the Council wish to restrict illumination principally to lighting within the premises. This is unrealistic. Shopping streets are now invariably well-lit by street lights. Businesses want to advertise their presence whilst trading in all light conditions; and illuminated fascia and hanging/projecting signs are commonplace. As above, modern internally illuminated fascia and projecting signs are often wholly acceptable; these also avoid the need for external fittings (such as spotlights or troughs) and associated wiring/switch boxes etc). There is

no reason to advise against the use of such common commercial shopfront advertising. And perhaps the Council could explain what “subtle, high-quality” lighting is and where it might be installed. Surely illumination through letters only, or “halo” illumination is “subtle and high-quality”. Yet these effects can only be produced with internal illumination! Indeed, the picture on the same page shows the fascia illuminated by three separate trough lights. Would the Council consider this “subtle and high quality”? What about the picture below where the lights are shown as lit?



This clearly shows the fallacy that external lighting is preferable. The light is so bright and variable that the sign can barely be read.

We suggest that the whole section be deleted. It is pointless as presently presented.

Respondent: Great Yarmouth Civic Society

Although there were some photographs of tiles leading to the door of a shop there was no comment about how the floor in this area should be treated.

The pavement outside a shop is probably outside the scope of "shopfront design but I think some mention should be made of the importance of good looking and safe for walking pavements. Too often the pavements have been dug up and repaired badly making them look bad and be dangerous to walk on.

Overall I think it is a very good document and should lead to a big improvement in the appearance of the town. A similar document is required for all buildings in the town as suggested by the Civic Society two years ago.

Respondent: Great Yarmouth Local History and Archaeological Society

A very good and comprehensive guide.

Respondent: Historic England

Thank you for consulting Historic England about the Great Yarmouth Shopfront Design Guide. As the government's advisory body on matters relating to the historic environment, we're keen to ensure that the conservation and enjoyment of the historic environment are considered at all stages of the planning process. As the consultation sets out, this guide has been produced by the Borough Council and the Great Yarmouth Preservation Trust on behalf the Great Yarmouth High Street Heritage Action Zone partnership. We are therefore pleased to have the opportunity to review the guide at this early stage.

Overall, we strongly welcome the production of the shopfront guidance, which of course is jointly funded by the High Street Heritage Action Zone Programme. The erosion of Great Yarmouth's character and appearance as a result of gradual inappropriate changes and neglect to some of its historically very fine commercial frontages is one of the principal elements that has influenced the current status of Great Yarmouth's conservation areas as being on the Heritage At Risk Register. The provision of clear, robust and helpful guidance regarding the conservation and reinstatement of this character is therefore considered to be a vital component of the process of enhancement that the town centre in Yarmouth is presently witnessing.

We consider that the guidance is well-illustrated with large and clear photographs and diagrams, which are helpful. This is particularly the case in Section 8 and in the Case Studies section. We would suggest that the subheadings in the Contents list are converted to hyperlinks that take the reader to the relevant section. This will help those reading the digital version of this document navigate the document.

A general point we would make is that all such guidance should be written in plain English to ensure that it is as accessible as possible to all relevant users, without of course eliminating the correct technical terminology where possible. We would therefore suggest that headings, subheadings and prose is reviewed to ensure its readability is pitched at a level appropriate for a planning document, rather than a special interest publication. At times, the SPD gives the impression of being directed towards the more specialist or knowledgeable reader, whereas this SPD should also be usable by a non-specialist building owner. A specific example we would suggest modifying is the heading for Section 3 – “A Existing Documents in Resume”. This should simply be ‘Existing Information and Guidance’, or similar.

We note that the document concentrates on the use and influence of the Classical orders of architecture on shopfronts. This is of course highly relevant to traditional shopfront design, but the document to some extent neglects to provide sufficient information regarding other stylistic influences and the broader evolution of style and form from the earliest shopfronts to the Modernism of the post-war period. Some more information on this would be welcome, and may help building owners to place their own building in context when considering the design of a new shopfront.

We would suggest that more information could be provided regarding the use of materials than the short paragraph provided. This can include recommendations on appropriate timber selection, the use of appropriate paint types for the renovation of historic timber frontages. The document “Details and Good Practice in Shopfront Design” by the English Towns Forum (now the Historic Towns and Villages Forum) is – although quite old - a good example of a document that contains such information. Whilst the level of detail it contains may be too much for the main SPD, it could be incorporated as part of the appendices.

We would suggest that the document also includes specific advice on how to sensitively accommodate access to upper floors in a frontage where rear access is not possible. The conversion of vacant upper floors for residential use is important to the vitality of town centres and to the viability of historic commercial buildings in general, but can result in unsatisfactory impacts on the historic environment where doors are inserted without careful consideration.

We would recommend that the design principles and guidance it sets out are placed in the context of the National Planning Policy Framework and the Local Development Framework. Whilst we note that the latter is referenced in the Appendices, the former is not mentioned anywhere in the document, and it is important that the relationship between good shopfront design quality and the relevant Design and Historic Environment sections of the NPPF is contextualised and clearly defined. This will add weight to the SPD’s requirements and create clarity for decision takers.

We suggest that Historic England’s advice regarding the repair, maintenance and upgrading of traditional windows is referenced. Whilst it refers principally to domestic windows, the information that it contains is also applicable to the conservation of historic timber shopfronts:

<https://historicengland.org.uk/images-books/publications/traditional-windows-care-repair-upgrading/>.

Respondent: Marine Management Organisation

Consultation response - PLEASE READ

Thank you for including the Marine Management Organisation (MMO) in your recent consultation submission. The MMO will review your document and respond to you directly should a bespoke response be required. If you do not receive a bespoke response from us within your deadline, please consider the following information as the MMO's formal response.

Kind regards,

The Marine Management Organisation

Marine Management Organisation Functions

The MMO is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are: marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing grants.

Marine Planning and Local Plan development

Under delegation from the Secretary of State for Environment, Food and Rural Affairs (the marine planning authority), the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the Mean High Water Springs (MHWS) mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of MHWS, there will be an overlap with terrestrial plans, which generally extend to the Mean Low Water Springs (MLWS) mark. To work together in this overlap, the Department of Environment, Food and Rural Affairs (Defra) created the [Coastal Concordat](#). This is a framework enabling decision-makers to co-ordinate processes for coastal development consents. It is designed to streamline the process where multiple consents are required from numerous decision-makers, thereby saving time and resources. Defra encourage coastal authorities to sign up as it provides a road map to simplify the process of consenting a development, which may require both a terrestrial planning consent and a marine licence. Furthermore, marine plans inform and guide decision-makers on development in marine and coastal areas.

Under Section 58(3) of [Marine and Coastal Access Act \(MCAA\) 2009](#) all public authorities making decisions capable of affecting the UK marine area (but which are not for authorisation or enforcement) must have regard to the relevant marine plan and the UK [Marine Policy Statement](#). This includes local authorities developing planning documents for areas with a coastal influence. We advise that all marine plan objectives and policies are taken into consideration by local planning authorities when plan-making. It is important to note that individual marine plan policies do not work in isolation, and decision-makers should consider a whole-plan approach. Local authorities may also wish to refer to our [online guidance](#) and the [Planning Advisory Service: soundness self-assessment checklist](#).

We have also produced a [guidance note](#) aimed at local authorities who wish to consider how local plans could have regard to marine plans. For any other information please contact your local marine planning officer. You can find their details on our [gov.uk page](#).

See [this map on our website to locate](#) the marine plan areas in England. For further information on how to apply the marine plans and the subsequent policies, please visit our [Explore Marine Plans](#) online digital service.

The adoption of the [North East](#), [North West](#), [South East](#), and [South West Marine Plans](#) in 2021 follows the adoption of the [East Marine Plans](#) in 2014 and the [South Marine Plans](#) in 2018. All marine plans for English waters are a material consideration for public authorities with decision-making functions and provide a framework for integrated plan-led management.

Marine Licensing and consultation requests below MHWS

Activities taking place below MHWS (which includes the tidal influence/limit of any river or estuary) may require a [marine licence](#) in accordance with the MCAA. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object. Activities between MHWS and MLWS may also require a local authority planning permission. Such permissions would need to be in accordance with the relevant marine plan under section 58(1) of the MCAA. Local authorities may wish to refer to our [marine licensing guide for local planning authorities](#) for more detailed information. We have produced a [guidance note](#) (worked example) on the decision-making process under S58(1) of MCAA, which decision-makers may find useful. The licensing team can be contacted at: marine.consents@marinemanagement.org.uk.

Consultation requests for development above MHWS

If you are requesting a consultee response from the MMO on a planning application, which your authority considers will affect the UK marine area, please consider the following points:

- The UK Marine Policy Statement and relevant marine plan are material considerations for decision-making, but Local Plans may be a more relevant consideration in certain circumstances. This is because a marine plan is not a 'development plan' under the [Planning and Compulsory Purchase Act 2004](#). Local planning authorities will wish to consider this when determining whether a planning application above MHWS should be referred to the MMO for a consultee response.
- It is for the relevant decision-maker to ensure s58 of MCAA has been considered as part of the decision-making process. If a public authority takes a decision under s58(1) of MCAA that is not in accordance with a marine plan, then the authority must state its reasons under s58(2) of the same Act.
- If the MMO does not respond to specific consultation requests then please use the above guidance to assist in making a determination on any planning application.

Minerals and Waste Local Plans and Local Aggregate Assessments

If you are consulting on a minerals and waste local plan or local aggregate assessment, the MMO recommends reference to marine aggregates, and to the documents below, to be included:

- The [Marine Policy Statement \(MPS\)](#), Section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK's) construction industry.
- The [National Planning Policy Framework \(NPPF\)](#), which sets out policies for national (England) construction mineral supply.
- [The minerals planning practice guidance](#) which includes specific references to the role of marine aggregates in the wider portfolio of supply.
- [The national and regional guidelines for aggregates provision in England 2005-2020](#) predict likely aggregate demand over this period, including marine supply.

The minerals planning practice guidance requires local mineral planning authorities to prepare Local Aggregate Assessments. These assessments must consider the opportunities and constraints of all mineral supplies into their planning regions – including marine sources. This means that even land-locked counties may have to consider the role that marine-sourced supplies (delivered by rail or river) have – particularly where land-based resources are becoming increasingly constrained.

Respondent: Natural England

Thank you for your consultation on the above dated and received by Natural England on 9 August 2021.

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.

Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature.

While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major impacts on the natural environment. We therefore do not wish to provide specific comments.

Should the SPD be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.

Respondent: Miss K Newnham (Member of public)

Thank you for forwarding a copy of the Supplementary Planning Document (July 2012) per our telephone conversation 10 Sept. 2021. It makes very interesting reading.

I am glad the Borough Council are giving our Heritage Sites support and attention. I enjoy looking at the buildings when I come into town – before Covid I went on a heritage walk along the Quay with Martham Historical Society it was excellent. We finished our walk in the Town Hall, a truly beautiful building. I do not have the knowledge to really comment on this subject but I would be very interested to read your results of consultation. I actually like the old Nat West Bank building on the riverside, it used to be a building I went to and the inner ceilings were lovely. I am very much a fan of the Winter Gardens building and cannot wait to see it restored to its former glory – we used to sit inside in the evenings before it closed. Your intended use is going to look lovely – how about a bar inside for night time use? I also like the hotels near Wellington Pier and the Casino building, they knew how to build something beautiful. Greenwoods (empty building) looks good too.

Good luck with your important project. Perhaps you would be kind enough to send me a copy of your next supplementary/ planning document I would like to see what you are doing for our historical part of Yarmouth. Thank you.

Respondent: Norfolk County Council

Thank you for your consultation on the Shopfront Design Guide SPD, the County Council supports the design guide proposals, which improve the vitality of the town centre and supports economic development of the area. At this stage it is not considered that the Shopfront Design Guide SPD raises any strategic cross-boundary issues with Norfolk County Council. I assume, under your

statutory duty to co-operate (Localism Act 2011), that if you feel there are any strategic cross boundary issues arising or likely to arise that you would seek further discussion with Norfolk County Council i.e. through myself as the first point of contact.

Appendix 2 – Full Text Comments from Consultation on the Final Draft SPD

Respondent: British Sign and Graphics Association - Chris Thomas – Outdoor Advertising Consultant.

1. These representations are submitted on behalf of the British Sign and Graphics Association (BSGA) in response to the above second draft SPD. We commented on the first draft of this SPD in August 2021 and we have examined your responses in the Consultation Statement.

2. We remain concerned that the this SPD continues to apply far more onerous considerations on advertisements than already apply within the NPPF, Planning Practice Guidance (PPG) and the Town and Country Planning (Control of Advertisements)(England) Regulations 2007 (as amended). Our comments relate to the parts of the SPD which concern “advertisements” in the statutory definition.

3. The Introduction to this draft SPD explains that its additional guidance on the design of shopfronts and advertisements is relevant to designated conservation areas and for proposals relating to listed buildings and other designated national and local heritage assets. We do not consider that it is properly titled. People do not always read introductions; they are often hubristic trash. The title should make crystal clear what the document is, ie “Shopfront Design Guide for Historic Buildings and Areas”. The Introduction should make very clear that the guidance is not intended for borough-wide application. Why can you not include paragraph numbers? Is no-one at your Council able to count?

4. You have made only minor changes as a result of our earlier comments. As a result, some of the proposed guidance in this draft SPD continues to exceed what is permitted in law; is impractical and unrealistic; and it totally fails to take account of the actuality of Great Yarmouth’s shopping environment. Much of the advice remains unduly onerous and excessive.

5. In chapter 7 “Design Principles”, page 28, the use of high quality materials is encouraged. But the paragraph then continues to denigrate uPVC, acrylics, plastics and “laminates” as if they are not high-quality materials (why you have removed “Perspex” is not clear – perhaps Perspex is now wholly acceptable – or are you afraid of lawyers?). The paragraph says that they are “unsympathetic”, but fails to explain how. 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 plastic or acrylic. They are suitable materials for the faces of letters and graphics illuminated from within. Your “automatic” rejection of modern materials is typical of the whole backward-looking SPD. This comment also applies to the advice on “Materials” on page 40.

6. Do you know what “laminates” are? They can be any two surfaces bonded together, usually where one protects another. Their use can be wholly appropriate depending on the materials. Remove the objection to laminates.

7. Page 28, fourth paragraph: “contemporary” and “distinct to its time” is a tautology. Delete one or other. Why should you use “traditional” materials in a contemporary design? This also partially contradicts the advice on page 47.

8. Pages 31 and 35. The Council appear to have an obsession with what is inside shop windows. The UK (including Great Yarmouth) is not (yet) a nanny state. What is inside a shop window is absolutely at the discretion of the shop owner. If he wants to put shoes inside the window of a flower shop or dustbins in a lingerie emporium, that is his business and no concern of the Council. This applies also to any posters/stickers applied to the inside of windows. It is the shopkeeper’s choice. Please tell us when it became the responsibility of the local planning authority to advise people not to do what they may perfectly lawfully do. We have explained before that the local planning authority has absolutely no authority to control what someone might put inside their windows (be it shop, house, factory, office or anything which is within the statutory definition of “building”). And the Council cannot get away with saying it is “best practice”. It is not – it is a small group of people within a local authority who think they know better than the people who actually do the business. You can’t control it – get over it and remove all this ridiculous “advice” about how professionals should go about their day-to-day business. Read again our original response regarding this tiresome obsession. The law is against you. To say something is “general guidance”, without qualification, borders on the illegal. “General guidance” could easily be replaced with “planner prejudice”; and would be more true.

9. In Chapter 8, “Fascia”, page 39, do you really think that the advice:

“The fascia should not be confused with the architrave divided in fascias.”

would be understood by anyone (the more so, since architrave is not defined elsewhere in the document)? It is in fact gibberish, clearly written by someone who understands neither classical architecture nor the English language. The following sentence confirms that the whole document is nonsense. It states that the shopfront is a separate element within a building – much of the other advice suggests that the shopfront should be considered as part of the overall building and designed accordingly!

10. The remaining advice on fascias and fascia signs (page 43) is equally poor. “Traditionally”, the fascia often equates to the frieze and is a horizontal band which sits atop the architrave and below the cornice and pediment. It was either plain or decorated, depending upon the overall design. It may have been used for advertising or not. This is the danger of the word “traditionally”. The Parthenon frieze has bas-relief sculptures between metopes. The Pantheon frieze advertises the fact that the building was built by M(arcus) Agrippa. So “traditionally”, the fascia is not used to display “the name of the shop”. We suggest you simply delete all this pseudo-architectural rambling.

11. You have not substantially altered your advice on modern box fascia signs. They are just as much a “fascia” as your example of a tilted board. Tilted boards are now so rare because they are dinosaurs (could not survive a changed environment). Your advice should be up-to-date and relevant. The reality is that internal illumination is the most common form of fascia sign within the town centre (including its conservation areas), particularly on properties with contemporary shopfronts. The SPD continues to fail to take account of innovation in sign design. In particular, there is no mention whatsoever of LED illumination. The smaller size of the luminaries, their long life and their minimal heat generation allows modern “box” signs to be much slimmer and more versatile than their “neon” tube illuminated predecessors. These older signs needed thickness in the depth of the box to allow for the bulkier tubes and their fittings, as well as to allow heat to dissipate.

Moreover, the SPD fails to recognise that internal illumination allows light to be very carefully directed (eg through letters/logo only), whereas external illumination necessarily casts light not only onto the sign but also its surrounds. It also often produces an uneven light spread which is itself unsatisfactory both for the retailer and the street scene. We note that you continue to produce the picture for “short blue” as a good example, without any reference to the dreadful impact of the external illumination which we previously provided. Our picture demonstrated the limitations of “hand-painted” lettering and poor quality external illumination. This is a typical example of where the SPD lacks balance throughout.

12. The advice on “corporate” signage (pages 39 and 40) is far too dogmatic. “Corporate” signs are provided for a reason. People can quickly identify the premises they seek; this is comforting and reassuring. It is only planners who have an issue with this. “Corporate” signs are not “often inappropriate”. They are “often” appropriate. “Are often” should be replaced with “may occasionally”.

13. In Chapter 8 “Colour”, page 37, we accept that some historic shopfronts may need to be coloured sensitively. However, the advice (although we recognize that it has been slightly altered) remains unduly onerous. Yet again, what is “excessive contrast”? Red and yellow? Red and white? Red and blue? Green and yellow? (think McDonald’s, Burger King, Tesco, Morrisons). Again, colour is a commercial consideration. Local authorities should only concern themselves when the colour is so obtrusive that it affects visual amenity (as required by the Regulations). Otherwise, this is again a matter for personal choice, as indeed it should be. And how will a local authority enforce this? Any deemed consent or excepted 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. So the “advice” cannot be enforced. We therefore suggest again that the “general” advice on colour be entirely deleted. We give a further example – what colour would most people associate with the Parthenon? White marble? Yet, when completed, its decoration was brightly painted in many colours with gold and silver fillets – see the main façade to Athens University in Panepistimiou (Eleutherios Venizelos) which attempts to give an idea (albeit toned-down for modern tastes – early peoples liked bright colours; and so do modern shoppers – genes don’t change quickly).

14. In Chapter 8 “Signage”, page 38, the advice remains totally unrealistic and we repeat our original objections. That fascia signs should use “traditional hand-painting” is unachievable. There are not enough professional sign writers still practising in the UK to supply even Great Yarmouth’s commercial offerings. And the price is prohibitive.

15. Acceptable fascia signage can be in a very wide range of forms and designs. Individual letters can be fitted even when there is an existing fascia board. Signs can be in a variety of materials to suit the style of the shopfront and/or building. A “traditional hand-painted” fascia board would look wholly out of place above a modern metal or plastic-framed shopfront with large plate-glass windows. Modern, slim, internally illuminated fascias can be wholly acceptable (see above). The advice is pointless and unrealistic. It should either be expanded widely or, probably best, replaced simply with:

“Fascia signs come in all sizes and materials. The advice on “Fascia” above is relevant. The fascia should be in scale with the shopfront and building as a whole, as should advertising upon it. Design will vary widely. But the important consideration is that the overall appearance of the fascia should complement the character and design of the shopfront as a whole and, where appropriate, the building of which it forms a part.”

16. It should also be borne in mind that local authorities may not concern themselves with the content of a sign unless it affects amenity or public safety in any particular case. The SPD cannot therefore dictate that the content of any sign be only the shop name or, for that matter, anything else. For example, there is nothing to prevent a greengrocer's fascia sign from saying "pharmacy". This is a ridiculous example because commercial consideration would never permit it – but the law would! So references to fascias or letters with the shop name only should be deleted.

17. The advice that hanging signs should be at, or below, fascia level has been retained. This remains impractical. Such signs must leave adequate headroom for public safety - a hanging sign below fascia level would often not permit this. And a hanging sign fixed to a fascia can spoil the fascia. It is for this reason that many hanging signs are displayed from brackets set above the fascia. The board may then be seen safely and clearly either at the same height as the fascia or wholly above (as often in the case of public houses).

18. Why should "gloss" paint be avoided? Most people paint the woodwork/metalwork of their homes in gloss paint for a reason. It wears well, does not readily discolour and gives a pleasing finish. Matt paints can appear dull and never weather as well. This advice has no sound basis and is unenforceable; again, the matter should be left to personal choice.

19. We suggest again that the whole "Signage" section should either be deleted or re-written entirely – it remains wholly risible.

20. Chapter 8 "Illumination", page 43, starts badly and continues in the same vein. "Traditionally", illumination inside buildings was from candles or dips (much later, town gas) and was extinguished when not needed (for economy and danger of fire). Shopfronts were dark at night. It was only with the comparatively recent advent of the electric light bulb that shop windows were able to be lit safely throughout the night if so desired. The suggestion that internally or halo illuminated signs "should be avoided" or "is out of place" puts the Council in with the dinosaurs. Such signs are commonplace, including within commercial conservation areas. As above, modern internally illuminated fascia and projecting signs are often wholly acceptable; these also avoid the need for external fittings (such as spotlights or troughs) and associated wiring/switch boxes etc). There is no reason to advise against the use of such common commercial shopfront advertising. And perhaps the Council could explain what "subtle, high-quality" lighting is and where it might be installed. Surely illumination through letters only, or "halo" illumination is "subtle and high-quality".

21. Your "case studies" are only designed to emphasise all the misplaced preconceptions in the rest of the SPD. They are pointless. The bibliography fails to include a single study on modern retail trends or the demise of the "traditional" town centre. The SPD only fulfils its role in aiding and abetting the collapse of town centre retail through excessive interference from people who have never been commercially active in the private sector.

22. One final suggestion for the benefit of Great Yarmouth as a whole. We suggest you scrap the whole document; conduct a consultation on what town centre retailers really want from the Council; and provide that.

Respondent: Marine Management Organisation

Please be aware that any works within the Marine area require a licence from the Marine Management Organisation. It is down to the applicant themselves to take the necessary steps to ascertain whether their works will fall below the Mean High Water Springs mark.

Response to your consultation

The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing European grants.

Marine Licensing

Works activities taking place below the mean high water mark may require a marine licence in accordance with the Marine and Coastal Access Act (MCAA) 2009.

Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence.

Applicants should be directed to the MMO's online portal to register for an application for marine licence

<https://www.gov.uk/guidance/make-a-marine-licence-application>

You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in English waters.

The MMO is also the authority responsible for processing and determining Harbour Orders in England, together with granting consent under various local Acts and orders regarding harbours.

A wildlife licence is also required for activities that that would affect a UK or European protected marine species.

The MMO is a signatory to the [coastal concordat](#) and operates in accordance with its principles. Should the activities subject to planning permission meet the above criteria then the applicant should be directed to the follow pages: [check if you need a marine licence](#) and asked to quote the following information on any resultant marine licence application:

- local planning authority name,
- planning officer name and contact details,
- planning application reference.

Following submission of a marine licence application a case team will be in touch with the relevant planning officer to discuss next steps.

Environmental Impact Assessment

With respect to projects that require a marine licence the [EIA Directive \(codified in Directive 2011/92/EU\)](#) is transposed into UK law by [the Marine Works \(Environmental Impact Assessment\) Regulations 2007 \(the MWR\), as amended](#). Before a marine licence can be granted for projects that require EIA, MMO must ensure that applications for a marine licence are compliant with the MWR.

In cases where a project requires both a marine licence and terrestrial planning permission, both the MWR and The Town and Country Planning (Environmental Impact Assessment) Regulations <http://www.legislation.gov.uk/uksi/2017/571/contents/made> may be applicable.

If this consultation request relates to a project capable of falling within either set of EIA regulations, then it is advised that the applicant submit a request directly to the MMO to ensure any requirements under the MWR are considered adequately at the following link

<https://www.gov.uk/guidance/make-a-marine-licence-application>

Marine Planning

Under the Marine and Coastal Access Act 2009 ch.4, 58, public authorities must make decisions in accordance with marine policy documents and if it takes a decision that is against these policies it must state its reasons. MMO as such are responsible for implementing the relevant Marine Plans for their area, through existing regulatory and decision-making processes.

Marine plans will inform and guide decision makers on development in marine and coastal areas. Proposals should conform with all relevant policies, taking account of economic, environmental and social considerations. Marine plans are a statutory consideration for public authorities with decision making functions.

At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark.

A [map](#) showing how England's waters have been split into 6 marine plan areas is available on our website. For further information on how to apply the marine plans please visit our [Explore Marine Plans](#) service.

Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the [Marine and Coastal Access Act](#) and the [UK Marine Policy Statement](#) unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our [online guidance](#) and the [Planning Advisory Service soundness self-assessment checklist](#). If you wish to contact your local marine planning officer you can find their details on our [gov.uk page](#).

Minerals and waste plans and local aggregate assessments

If you are consulting on a mineral/waste plan or local aggregate assessment, the MMO recommend reference to marine aggregates is included and reference to be made to the documents below;

- The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK) construction industry.
- The National Planning Policy Framework (NPPF) which sets out policies for national (England) construction minerals supply.

- The Managed Aggregate Supply System (MASS) which includes specific references to the role of marine aggregates in the wider portfolio of supply.
- The National and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period including marine supply.

The NPPF informed MASS guidance requires local mineral planning authorities to prepare Local Aggregate Assessments, these assessments have to consider the opportunities and constraints of all mineral supplies into their planning regions – including marine. This means that even land-locked counties, may have to consider the role that marine sourced supplies (delivered by rail or river) play – particularly where land based resources are becoming increasingly constrained.

If you require further guidance on the Marine Licencing process, please follow the link

<https://www.gov.uk/topic/planning-development/marine-licences>

Respondent: Norfolk County Council – Lead Local Flood Authority

Thank you for your consultation on the above, received on 14 February 2022. We have reviewed the consultation and wish to make the following comments.

For properties and premises located in areas at risk of flooding from any source, the LLFA would recommend that flood resilient design solutions are incorporated into the proposals. We recognise that property and premises level flood resilience solutions will be need to be bespoke to individual premises, with consideration being focused on identifying the types of measures that are most appropriate for the given premises and the nature of the flood risk faced in that location.

Flood resilience can further be increased by paying due regard to the property or premises threshold type and level.

Further guidance on the information required by the LLFA from applicants can be found at <https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management/information-for-developers>

Respondent: Norfolk County Council

Thank you for your consultation on the Shopfront Design Guide SPD, the County Council supports the design guide proposals, which improve the vitality of the town centre and supports economic development of the area. We also suggest referring to the County Councils Safe, Sustainable Development document found [here](#) Note 3 Design of Developments has information on lights and shop front heights. At this stage it is not considered that the Shopfront Design Guide SPD raises any strategic cross-boundary issues with Norfolk County Council. I assume, under your statutory duty to co-operate (Localism Act 2011), that if you feel there are any strategic cross boundary issues arising or likely to arise that you would seek further discussion with Norfolk County Council i.e. through myself as the first point of contact.



GREAT YARMOUTH SHOPFRONT DESIGN GUIDE

Supplementary Planning Document

**GREAT YARMOUTH
HIGH STREET ACTION ZONE**

SHOPFRONT DESIGN GUIDE

Great Yarmouth

SUPPLEMENTARY PLANNING DOCUMENT

July 2022



Historic England




10 Regent St.



Fig. 001 10 Regent Street, Great Yarmouth.

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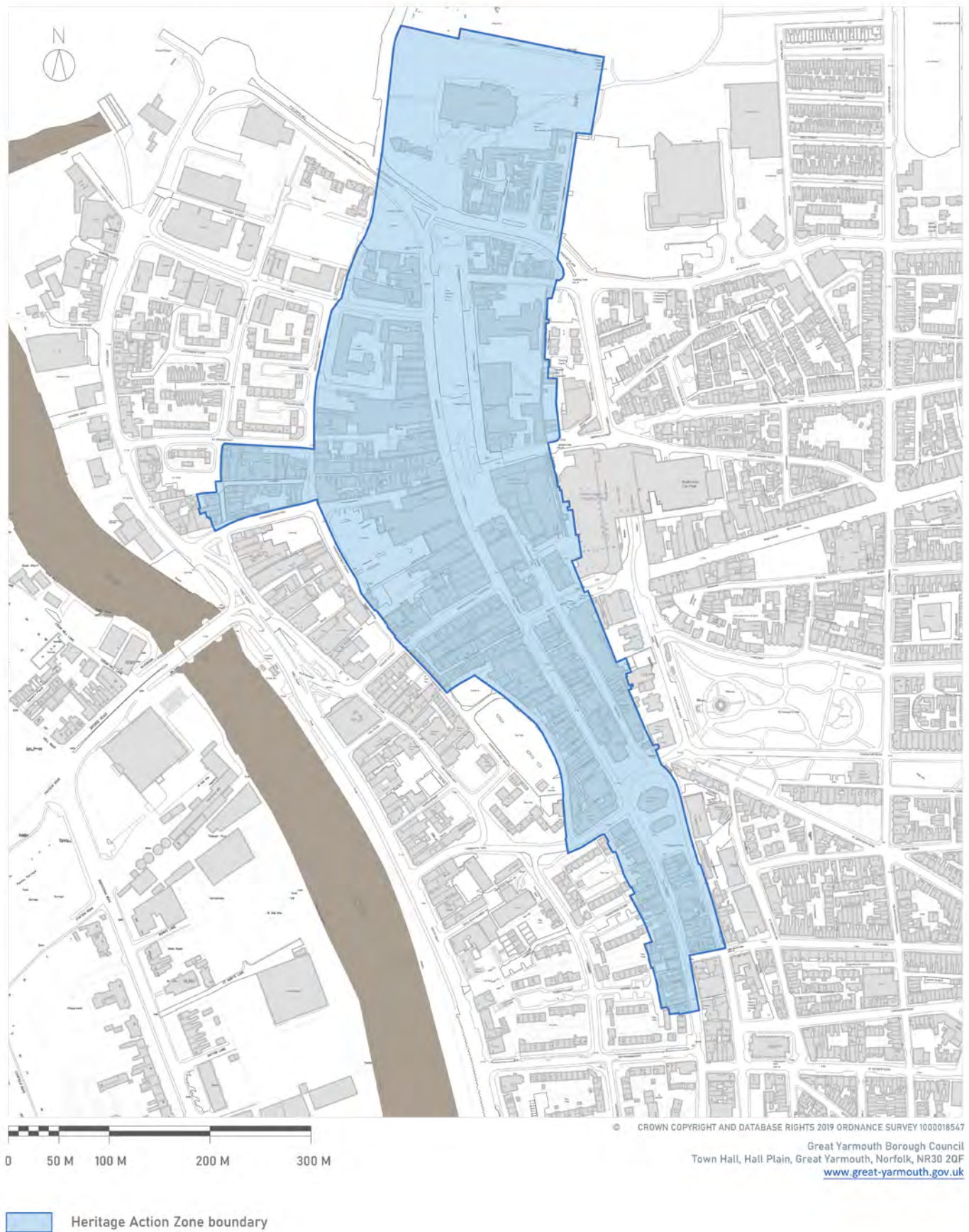


Fig. 002 Heritage Action Zone.

INTRODUCTION

This guidance has been produced as part of Historic England's High Street Heritage Action Zone (HAZ) initiative – a four-year scheme (2020-2024) aiming to enhance and better reveal the historic environment in Great Yarmouth's town centre. The scheme offers grants to repair and enhance shopfronts and applicants are encouraged to read this document.

Although the HAZ scheme covers a specific area in the town centre, this document provides general guidance and design aspirations that can be used for shopfronts and advertisements in other historic areas of the town and borough.

The purpose of this document is to promote and encourage good quality retail architecture (including shopfront and advertisement design) suitable for the character of conservation areas, listed buildings, non-designated heritage assets of local historic interest and historic settings. The guidelines outline general approaches which should be considered when planning any alterations and repairs to existing shopfronts, or when developing new retail spaces and advertisements.

More information about the Heritage Action Zone scheme can be found through the following links:

- www.great-yarmouth.gov.uk/gyhaz
- www.historicengland.org.uk/services-skills/heritage-action-zones/great-yarmouth/
- www.great-yarmouth.gov.uk/article/6147/Great-Yarmouth-to-benefit-from-share-of-95m-heritageboost-for-high-streets



Fig. 003 Market Row, Great Yarmouth.

SUPPLEMENTARY PLANNING DOCUMENT

A suite of Supplementary Planning Documents is currently being produced by Great Yarmouth Borough Council. SPDs are documents that add further detail to the policies included in the Local Plan. These documents are usually used to provide further guidance for development on specific sites or particular issues, such as design. Supplementary Planning Documents are capable of being a material consideration in planning decisions but are not part of the development plan.

It is acknowledged that some interventions and changes to the appearance of shopfronts may not require planning permission as they either do not constitute development, are permitted development under the Town and Country Planning (General Permitted Development) Order 2015 or have deemed consent under the Town and Country Planning (Control of Advertisements) Regulations 2007. In these cases, the Council still encourages shop owners and developers to have regard to the guidance in this SPD in order to help improve the character of the area.

1. HISTORIC GREAT YARMOUTH AND SHOPPING



Fig. 004 King Street, Great Yarmouth (c.1900).

The essential human need to exchange goods in order to survive has shaped towns and cities since the medieval period. This resulted in urban centres being moulded by trade, which also reflected historic, economic and social values throughout the centuries.

Great Yarmouth's past economic prosperity was inextricably linked to its situation between river and sea. This resulted in the development of a strategic harbour and popular river port which gave easy access for transportation and trade.

Great Yarmouth has been a significant market town since the Middle Ages, evident through its historic built environment and Market Place. It is

documented that Great Yarmouth's Market Place has existed since 1385, when it was recorded that the area was partly paved. It is likely, however, that the Market Place was established even before King John's Charter was granted to the town in 1208. Its preservation from the Middle Ages up to the present day highlights its historic, economic, social and cultural significance.

Close interaction between the trader and the buyer evolved in the late Middle Ages, but the modern understanding of a shop did not exist; goods were generally manufactured in warehouses and then transported to be sold at market. Throughout the Middle Ages most craftsmen and women – including shoemakers, brush makers, tailors and

goldsmiths – sold goods of their own manufacture from their workshops. When demand for their goods grew, craftspeople with premises in town centres found it profitable to take advantage of their location and stock goods manufactured by others as well. This resulted in the transformation of many town centre workshops into shops. In Great Yarmouth, this change mainly occurred in the area around the Market Place, along shopping streets and probably around the Quay.

These initial shops varied in form and function. Some would have been little more than stalls which would have opened on a market day, while others were used by wealthy merchants as showrooms. Nothing remains of any medieval shops in Great Yarmouth, but there are a number of 16th and 17th-century houses concealed behind later façades. An exceptional example is The Old Merchant's House, on Great Yarmouth's South Quay which is designated as a Grade II* listed building.

Shopping became a leisure activity involving browsing, handling goods and conversation around the mid-17th century, following the establishment of fashionable shopping galleries in London. It was only in the 18th century, however, that glazed shopfronts became affordable. This transformed British high streets and, locally, led to further development of Great Yarmouth's Market Place and other central shopping areas.

Following 1815 and the Battle of Waterloo, further changes followed. Bazaars and arcades were introduced as a new shopping venue, superseding former showrooms. As standards of living improved in the Victorian era, new methods of retailing developed. These included co-operative stores and multiple or chain stores. The oldest purpose-built department store in Great Yarmouth was Palmers, established in 1837 and in continuous operation until its permanent

Fig. 005 King Street, Great Yarmouth (c.1900).



closure in 2020. The first covered shopping complex in Great Yarmouth was the Marine Arcades next to the south wing of The Empire. These two shopping arcades were built in 1902 and 1904 by A. S. Hewitt for developers Ferrier & Ferrier [Pevsner 1997: 528]. The original 20 shops inside catered for the holiday trade. Presently the site of the Leisureland amusement arcade, the aluminium portals - which partially conceal the original terracotta gables - are inscribed with their respective dates. More popular and still in use today is the Central Arcade, later renamed Victoria Arcade which was built in 1925.

The years following the Second World War brought further changes in consumer behaviour, as shopping became increasingly democratised and increasingly fragmented. The Market Gates

shopping centre was built in the mid-1970s and several supermarkets and retail parks were established, though mostly outside town centres.

The principal historic shopping areas which have generally been preserved in Great Yarmouth include Market Place, King Street, Market Row, Broad Row, Hall Quay, South Quay, George Street, Howard Street South, Regent Street, Regent Road and Gorleston's High Street. Some village centres in the Borough retain individual examples of traditional village shopfronts. These are within the commercial centres of Conservation Areas and include listed buildings.

Trade has played a key role in shaping the historic character of the area. Its evolution is reflected in changes in society, technology, social mobility and taste, and Great Yarmouth has developed accordingly. The gradual evolution of Great Yarmouth's principal historic shopping areas is natural, but in some areas the former design, rhythm and integrity of historic retail architecture is endangered. Shopfront design and maintenance particularly influence the character of buildings and their wider historic area.

Fig. 006 Market Place, Great Yarmouth (c.1926).



2. CULTURAL SIGNIFICANCE OF SHOPFRONTS

Shopfronts are an essential part of the urban streetscape and important character-defining elements in historic towns. Their visual style, appearance and rhythm make a significant contribution to the cultural value of the historic place. Traditional shopfronts create a sense of identity and belonging, interest and variety in historic towns. In addition, contemporary shops which blend successfully into their environment can provide diversity and impress with creative solutions and interpretations, varied detail and use of materials.

Shopfronts have a significant effect on the locality. Depending on the way the shop is presented this effect can be positive or negative. Well-designed and carefully considered shopfronts can enhance the appearance of the streetscape and add to the visitor experience. They help define public space and promote interesting pedestrian spaces by forming an active streetwall. The proper scale and design of shopfronts can support an active, engaging, and pedestrian-oriented street life. Quality environment,

good design, intriguing displays and balanced composition and colours create a favourable impression for the business. A street with attractive premises is much more likely to attract visitors, and custom for shop owners.

Poor shopfront appearance can lead to disintegration, detract from the wider qualities of the area, erode the visual qualities of the streetscape and deter shoppers. Poor design, low-quality materials, bad workmanship, inappropriate colour schemes, intrusive lighting, excessive signage and advertising do little to create good first impressions and entice customers.



Fig. 007 General view, Market Place, Great Yarmouth.

3. EXISTING INFORMATION AND GUIDANCE

Shopfronts and Advertisements in Historic Towns (English Historic Towns Forum, 1991).

The booklet by the English Historic Towns Forum covers principles and details of good design, as well as planning permission requirements. The document is not specific to a locality but covers broad topics and variations in brief. Although published three decades ago, it is useful for a broader perspective on the subject.

Details of Good Practice in Shopfront Design (English Historic Towns Forum, 1993).

The documents include a good practice section that covers conservation advice on shopfronts produced from different materials – timber, stone and cast iron. The booklet presents examples and details for new shopfronts in a historic environment: www.htvf.org/resources/Details-and-Good-Practice-in-Shopfront-Design-doc_23.pdf

- a. Stratton, Winchester by Powell Design Partnership.
- b. 34 the Bull Ring, Ludlow by Boots Retail Construction and Engineering.
- c. Cannon Street, Dover by Dover District Council Architects Department.
- d. The Children's Bookshop, Oxford by The Oxford Architects Partnership. Corpus Christi, Cheltenham by Bayleys.

A solution that works in one place will not always translate to another but becoming familiar with good examples will help when designing new shopfronts.

Existing Information and Guidance

The fieldwork and desk research by Kathryn Morrison and Katherine d'Este Hoare covers Great Yarmouth's historical background, shopping in the town and a rapid survey of historic shops from Broad Row, George Street, Hall Quay, Howard Street South, King Street, Market Place, Market Row, Regent Street and Regent Road. The document is a good start for a better understanding of the shops in Great Yarmouth.

Traditional Windows: Their Care, Repair and Upgrading (Historic England, 2017)

Historic England's advice on repair, maintenance and upgrading of traditional windows covers a wide range of topics, from history and significance, to maintenance, repairs, thermal upgrading, and replacement. While it refers principally to domestic windows, the information applies to the conservation of historic timber shopfronts.

www.historicengland.org.uk/images-books/publications/traditional-windows-care-repair-upgrading/

4. SHORT HISTORY OF SHOPFRONT DESIGN

It is important to understand the overall historical development of shopfront design. “The first and primitive shop was probably a simple movable trading booth, capable of being easily taken down, and carried from this place to that, and structurally only just strong enough for such buffetings of weather as it might be expected to withstand in the open places of the markets. For in early times the fair and the open market were the chief means of effective retail trading.” [Horace Dan. *English Shop-Fronts...*, 1907, p. 1].

“The trading booth [...] remained unchanged and unimproved until the Middle Ages, when [...] the shop, instead of being a temporary structure, became a permanent part of the building. [...] At first it was merely an opening and simple framework filled at night with shutters. It may or may not have been glazed, as [...] glass [...] was not generally known of until about 1180. Even then it was but sparingly used, being expensive to procure and fix. The shop opening was sometimes closed at night with a wooden shutter hinged to

the frame of the window. In the daytime this shutter was let down and rested upon a wooden leg or bracket, the flat table thus formed being used for the display of the goods.” [Ibid., p. 2].

“From the first mediaeval shop was developed other types which appropriately enough were termed Bulk Shops, and which were more prominently noticeable in London. [...] In some cases t]he hinged shutter has become the top of a fixed and permanent base, while an overhanging pent roof [...] projected over the bulk upon which the shutter rested when down.” [Ibid., p. 3].

Later, the traditional shopfront presented a well-established balance between a set of elements. Vocabulary and grammar relied (sometimes loosely) on classical architectural principles that gained popularity in the Georgian period and have been largely present ever since. As Mark Girouard confirms: “The basic form [of the shop-front] had been established in the mid-eighteenth century, as a result of a

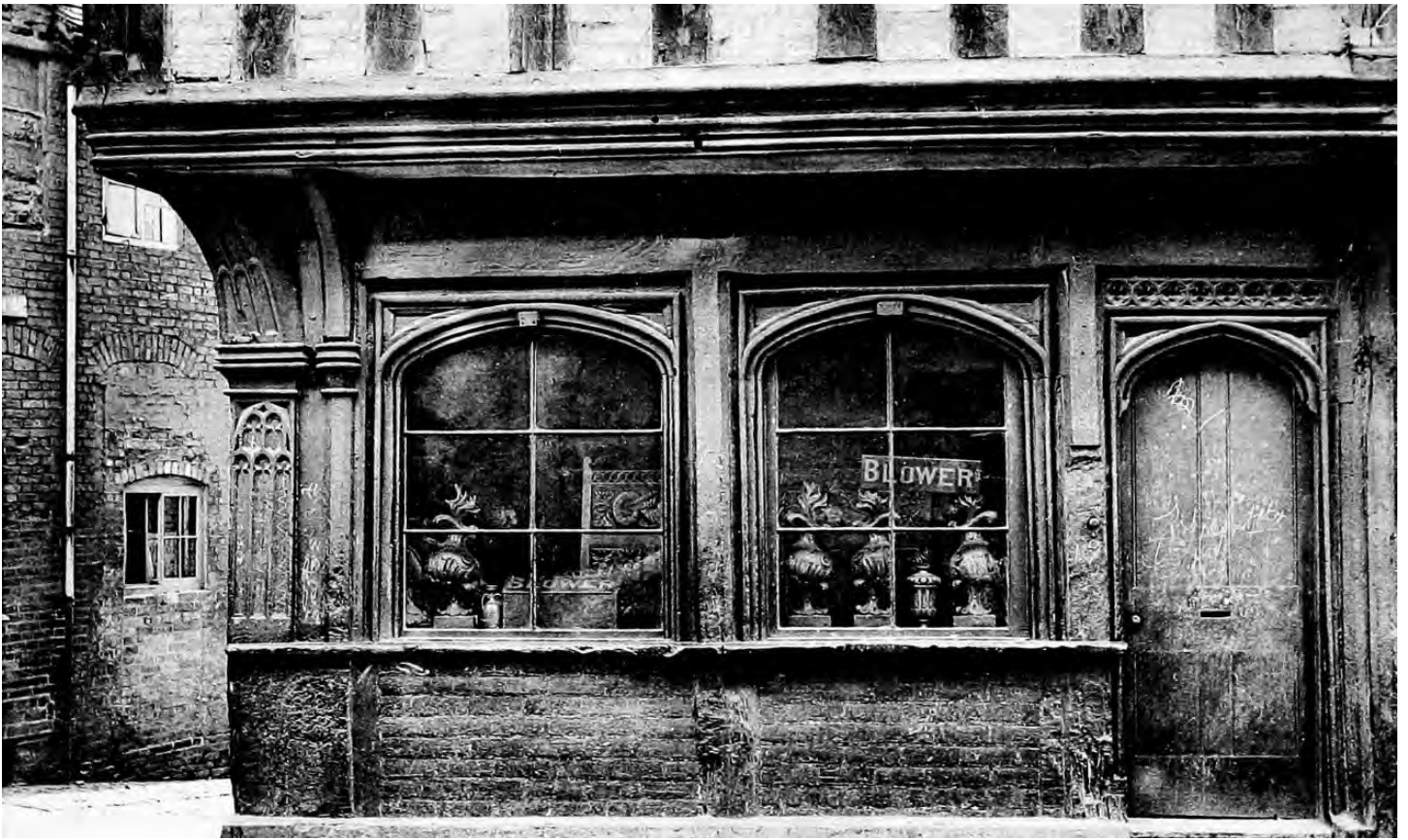


Fig. 008 Shop on Butcher Row, Shrewsbury.



Fig. 009 Old Bulk Shop, Clare Market, London.

creative use of the language of classicism.” [Mark Girouard. *The English Town*, 1990, p. 225]

A utilitarian or formal approach might dominate in different preserved examples: “[T]he usual eighteenth-century [shop’s] arrangement was to have a couple of bow-windows with a door in the centre, the whole with an entablature, and with a door at the side giving access to the rooms above [...]. When the Neo-Classical taste dictated greater simplicity, shopfronts became flat, divided by means of pilasters or columns, with a fascia over”. [James Stevens Curl. *Georgian Architecture*. 1993, p. 144]

The present-day shopfront fascia developed from the classical frieze. This again demonstrates the importance of understanding, scale and proportion: “Later in the eighteenth century, the frieze of shop entablatures began to be inscribed with the name of the shopkeeper. The columns, following the taste of the time, became spindly and elegant, dwindled to pilaster strips, or disappeared altogether;

delicate fanlights appeared above the doors, and sometimes above the windows. Occasionally the formula was translated into Georgian Gothic”. [Alan Powers. *Shop Fronts*, 1989, p. 5].

The early 19th century relates again to the rise of stricter Neoclassicism: “Around 1830, taste changed again, and substantial columns and heavier detail came back into fashion.” [Mark Girouard. *The English Town*, 1990, pp. 224-225].

During the mid and late 19th century and the Victorian period, more Mannerist variations of classical shopfronts were established: “Thin pilaster strips, surmounted by consoles, and a vigorously modelled cornice acted as a frame to the glass. The cornice was finished off by a palisade of cast-iron ornament. Curving glass, consoles, and cast-iron trim were to become favourite elements of Victorian shop-fronts.” [Mark Girouard. *The English Town*, 1990, p. 227].



Fig. 010 No. 34 Haymarket, London (c. 1754).



Fig. 011 No. 15 Cornhill, London (c. 1770).



Fig. 012 Late Victorian console brackets, part of an unsympathetically treated historic shopfront on King Street, Great Yarmouth.

In the interwar period, shopfronts were dominated by modern materials and aesthetics: “Favoured materials were Vitrolite, a self-coloured glass, usually black, pale green or orange, and chrome metalwork and lettering. Stall risers were often of mottled Aberdeen Granite, highly polished. Other stone and marble veneers were also popular. The shop front was intended to shine by day and night, with the assistance of back-lit letters or internally illuminated facias.” [Alan Powers. *Shop Fronts*, 1989, p. 31].

After the Second World War, some of the earlier tendencies and materials were still present and expanded upon, but in most cases shopfront designs were further simplified. In some cases, bold and unique approaches broke with convention, as in the design of Grima Jewellers in London.



Fig. 013 No. 118 T Fox & Co, London Wall, London (E. Pollard, 1937).



Fig. 014 Ladies' Wear Shop, Regent Street, London (Bronek Katz and R. Vaughan, 1948, result of the first post-war competition for a shopfront and interior)

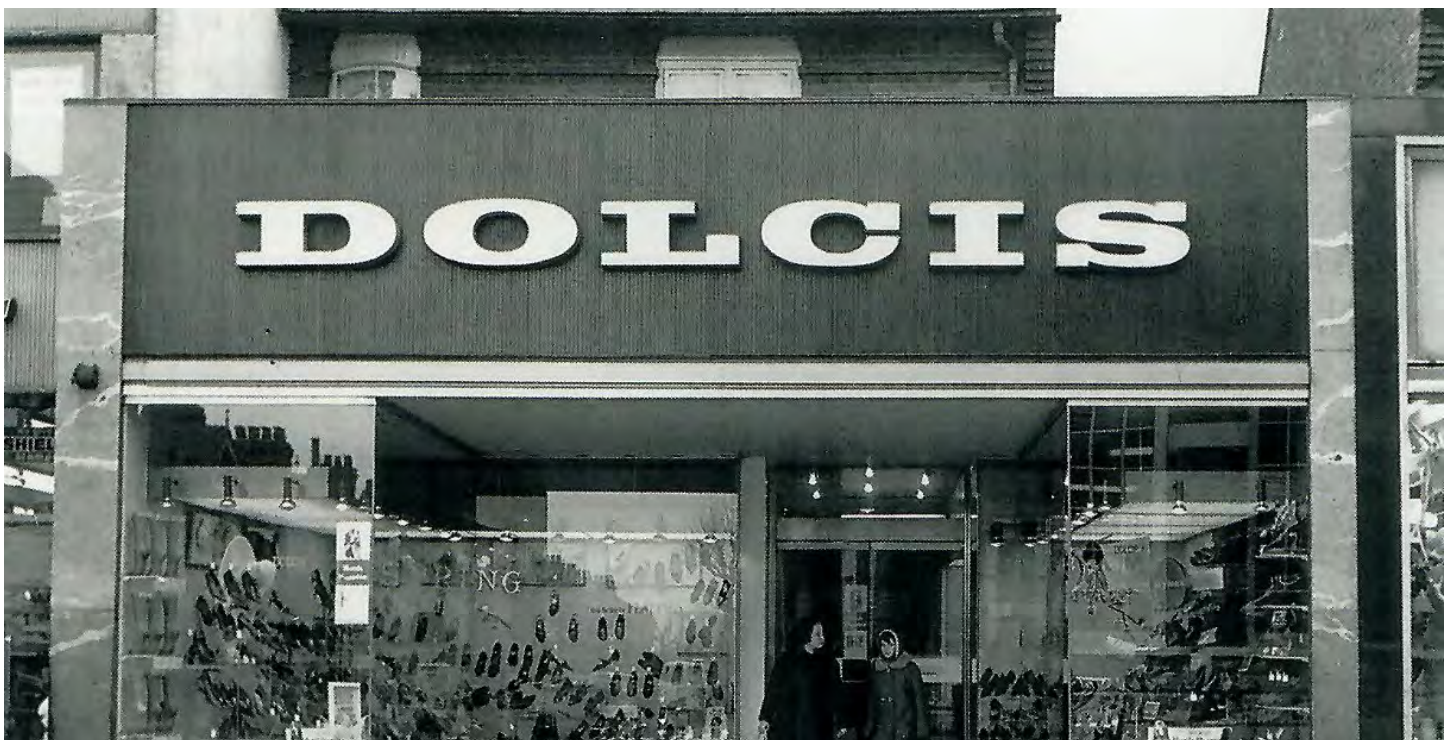


Fig. 015 Dolcis on East Ham High Street, London (1960s)

During the 1970s, aluminium shopfronts and plastic box signs became standard, interfering with the historic character of many towns, while adding a specific historical layer. Another trend originating in the 1970s – resulting from the conservation movement – was more ‘traditional’ shopfront designs.

As previously mentioned, this Shopfront Design Guide provides advice for interventions within a historical setting. Historic England defines conservation as: “1. The process of managing change to a significant place in its setting in ways that will best sustain its heritage values, while recognising opportunities to reveal or reinforce those values for present and future generations. 2. Repair ‘as found’, using techniques and strategies designed to maximise the preservation in situ of existing material, and minimise restoration or replacement.” [Practical Building Conservation. Conservation Basics, 2013, p. 344].

When managing change to shops and shopfronts in historical settings we should

be aware of their large historical diversity, and already established historical balance and character. In theory, the overall historical development is important, but in practice selected historical periods should be analysed on a case-by-case basis.

Shops and shopfronts in Great Yarmouth and the surrounding area built before the 1820s or 1830s are rare and are of high value. Shops and shopfronts of a good standard built between the 1920s and the 1980s should be studied further and preserved as more or less unique examples representing diverse styles and approaches from those periods. Existing shopfronts of a good standard found within the Heritage Action Zone Area are predominantly built between the early 19th century and the Second World War.

To focus on some relevant basic architectural information, we should consider the principles of Classical architecture and some variations from the late Victorian period.

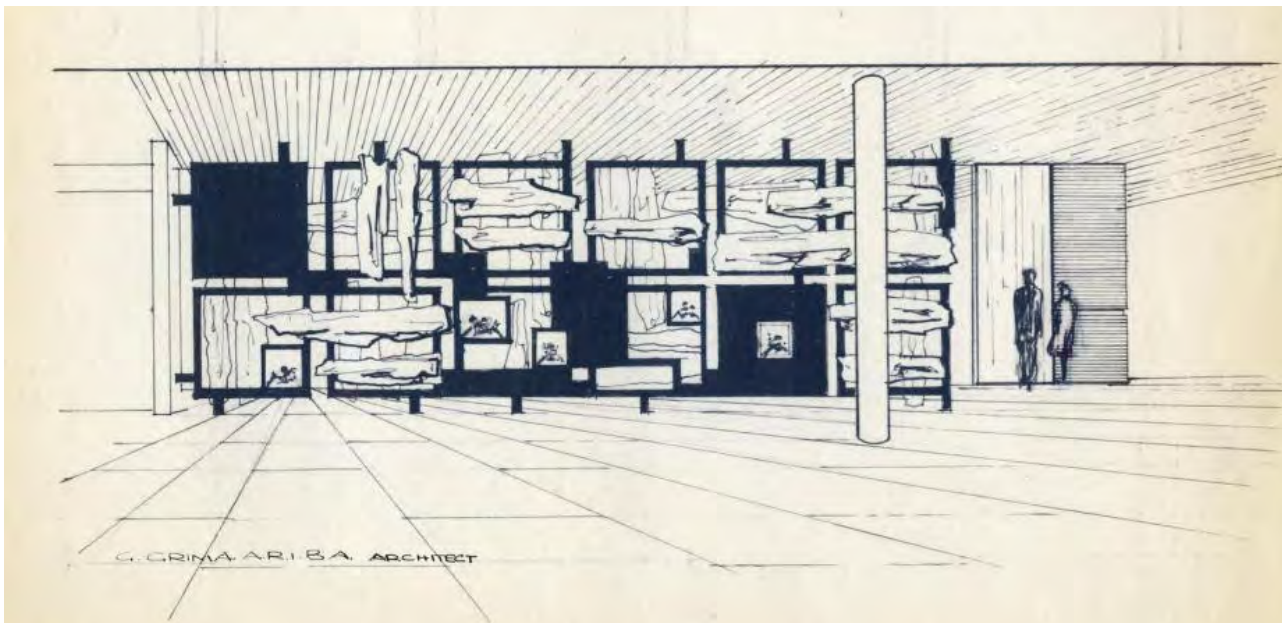


Fig. 016 Grima Jewellers, Jermyn Street, London (A. Grima, 1962)

5. CLASSICAL ARCHITECTURE

Familiarity and understanding of classical architecture are essential preparation for surveying existing shopfronts or designing new ones in a historic area. Classical architecture begins in antiquity and has always been bound with harmony, proportion, and balance.

An architectural order consists of specific tectonic and decorative forms, proportions, and elements. The most basic of these are the column (base, shaft and capital) and entablature (architrave, frieze and cornice).

The classical architecture of Ancient Greece uses Doric, Ionic and Corinthian orders. The Romans developed their own version of the Doric, used the Tuscan, and invented the Composite order. Mannerist and Baroque tendencies since Roman times deviated from the canonical use of the classical orders of architecture long before the Victorians.

In the design of shopfronts, the full and elaborate use of classical orders was not always present. In some cases, astylar or simplified classicism was applied. Later on, loose variations of classical themes were established, and dominated in the second half of the 19th century.

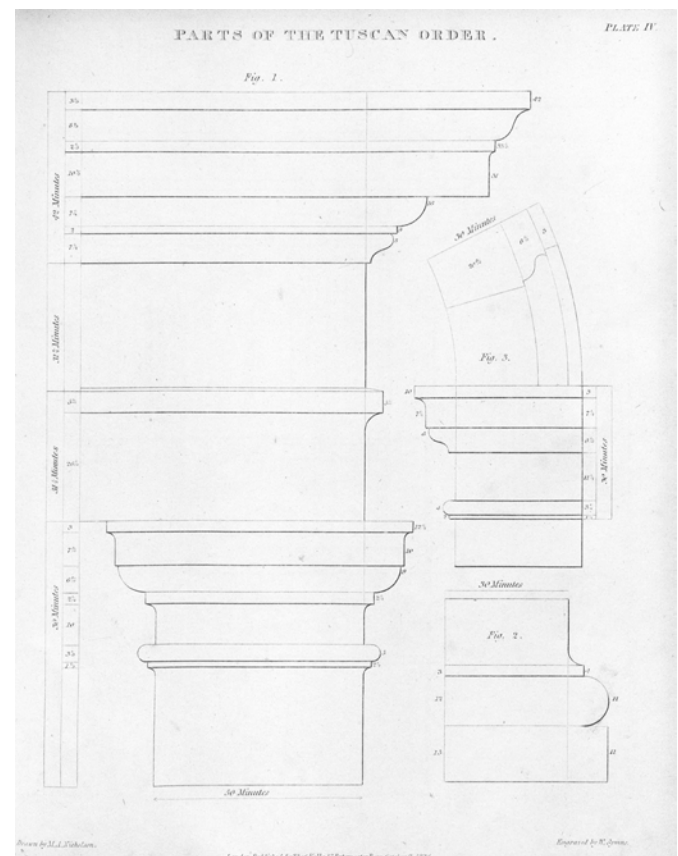


Fig. 017 Parts of the Tuscan Order.

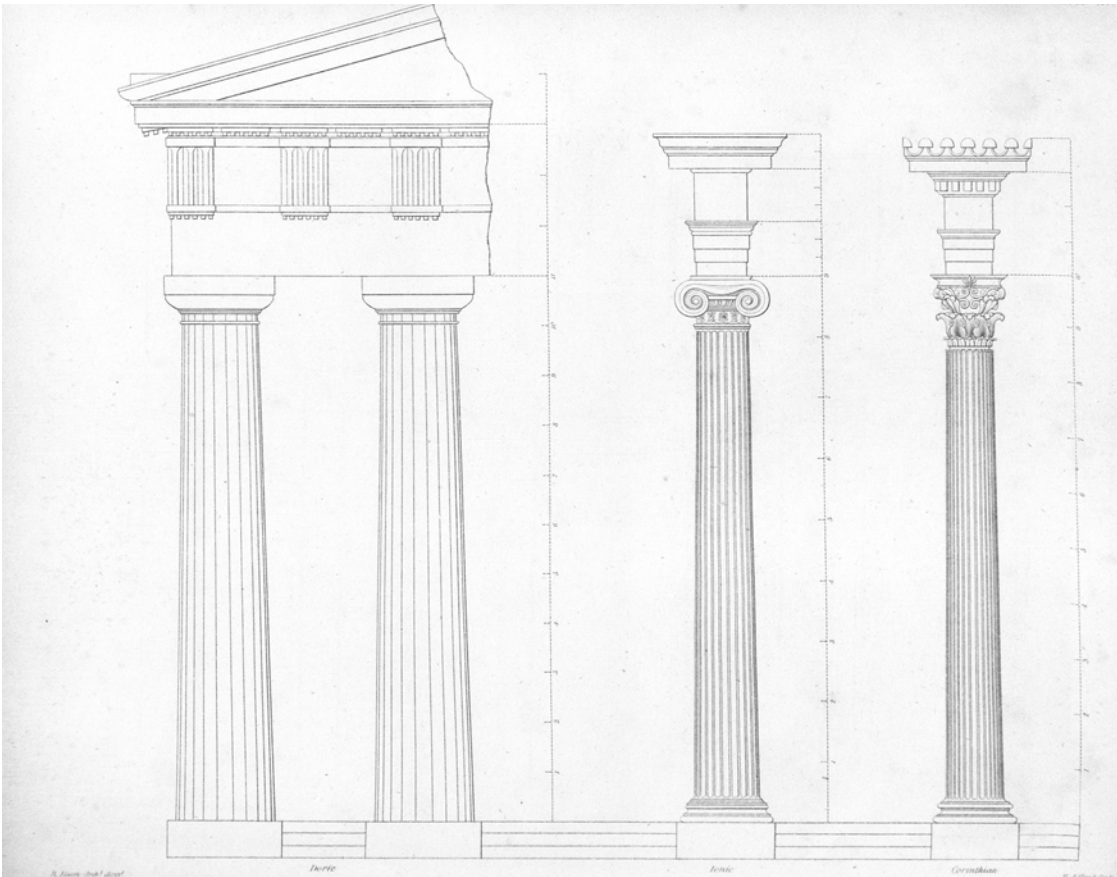


Fig. 018 Architectural Orders of Ancient Greece.

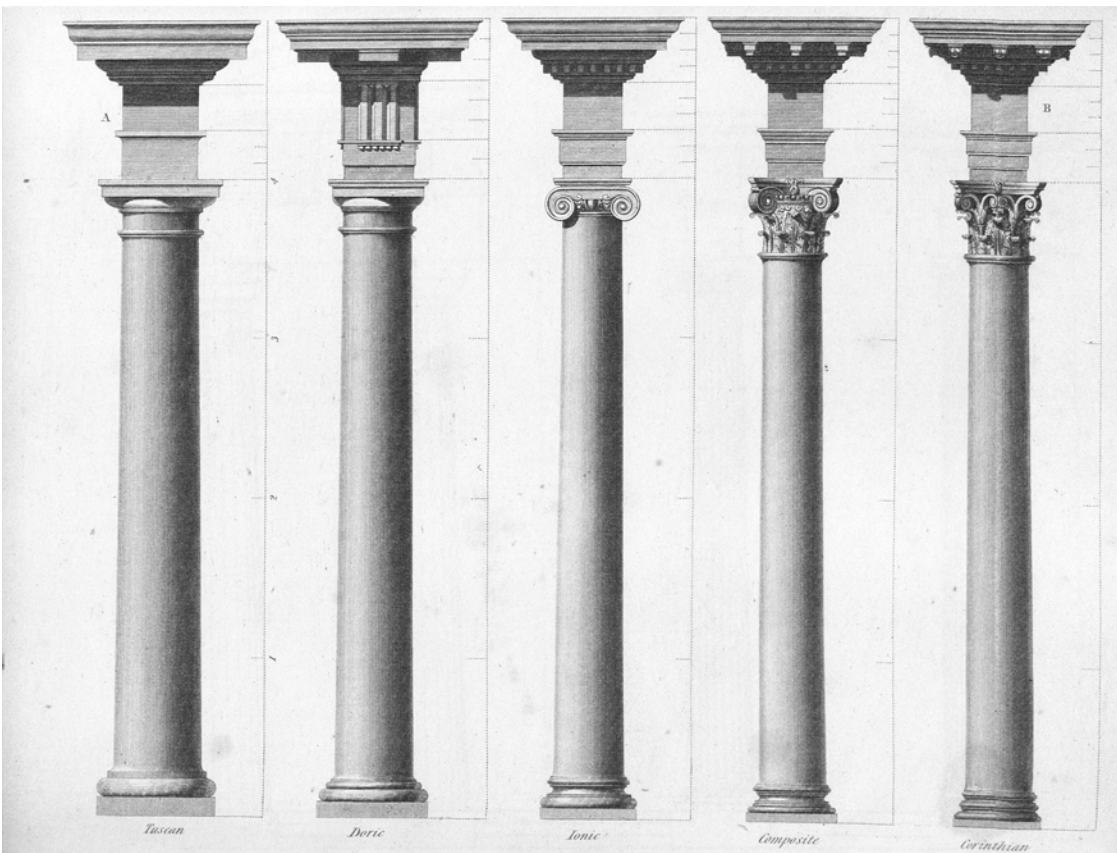


Fig. 019 Architectural Orders of Ancient Rome and Italian Renaissance after Vignola.

6. CLASSICAL TRADITION, SHOPFRONT DESIGN AND ELEMENTS

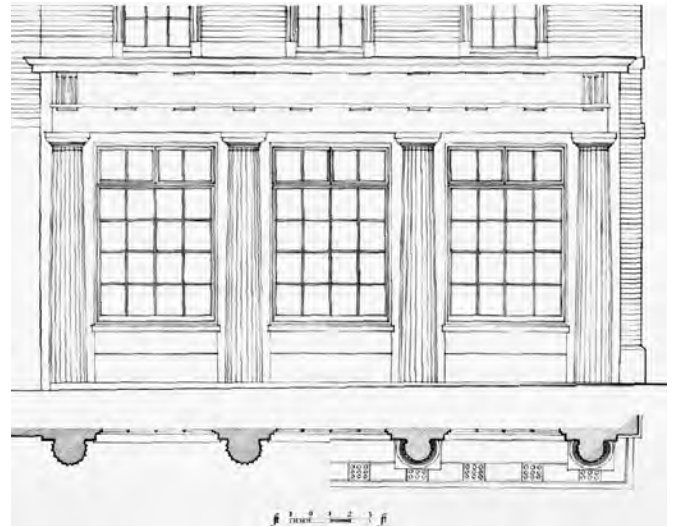


Fig. 020 37 Soho Square, London.

In shopfront design, the use of the classical orders of architecture varies. During some periods it is strict, in others there are looser interpretations. More recently, orders and elements of classical design may be avoided altogether or interpreted in a post-modern manner. These facts are of high importance. Any shopfront design, existing in itself, newly designed in its context, should be understood in depth. This could not be achieved without at least a basic understanding of classical architecture. For example, when we analyse a specific piece of architecture, we should be able to suggest if what we see is an original intention, later interpretation, poor restoration attempt, a lapse of fabric or something else that may have occurred over time.

For example, at 37 Soho Square, London (c. 1820), the classical Greek Doric order is accommodated to suit the needs

of a shopfront. As with other classical examples, the frieze becomes the shopfront fascia. Using the Doric order, this is hard to accomplish, as the frieze contains a series of triglyphs and metopes. In this example we see the triglyphs omitted, but all related elements from the architrave and cornice are kept in place. To analyse such an example, we could ask if it was designed as built or whether it was adapted at a later (still historic) date.

The early 19th century Doric porch of 20 South Quay, Great Yarmouth (Customs House, Grade II listed building) shows a deviation from the classical ideal. Triglyphs are omitted from the frieze and guttae are applied regularly at the top end of the architrave. For any of these deviations, we could ask why they are present. One possibility is the accommodation of a building name, currently, “Great Yarmouth Port Authority”.



Fig. 021 20 South Quay, Custom House, Great Yarmouth.

Other uses of the Doric order could be altogether simplified with clear architrave and frieze, as in the example of 8-10 George Street, Great Yarmouth.

If we compare these examples with 7 Church Plain, Great Yarmouth (Grade II listed building) [Fig. 023] we find the classical articulation of the Doric, and an actual shopfront fascia is absent. That is a specific line of the character and therefore preserved. Research shows the ground level of this building used to be a public house. Naturally, in any conversion or adaptive re-use, box signs over classical or other decorative elements should be avoided, as they affect the character and significance of the building.

If we ask the questions “what it is”, “what it was”, “what it was supposed to be”, we might not necessarily find answers or achieve a reasonable level of certainty for restoration of a specific detail. But asking these questions should prevent interference with historic fabric and significance if we lack understanding.

The single-unit retail shopfront is the most common element of the high street, although department stores, public houses, purpose-built restaurants and banks might all relate to the same architectural form. Some examples derive from the same design logic and are close enough to be included in a study or further research .

Fig. 022 8-10 George Street, Great Yarmouth.





Fig. 023 7 Church Plain, Great Yarmouth.

Uniformity and diversity are important in a conservation area and historic environment. As separate elements, they could be discussed at length from a historical or aesthetic perspective. In practice, they should be studied in context and balanced. Regarding shopfronts and their traditional development, James Curl points out:

“Uniform groups of shop-fronts [...] were unusual, because the tendency has always been to allow the Nation of Shopkeepers to do what it likes at the expense of architectural order. At Regent Street [in London] there was a brave try at the

imposition of such order, but it gradually gave way to a free-for-all [...] frightful mayhem has replaced the order intended by the original designers.” [James Stevens Curl. *Georgian Architecture*. 1993, p. 144]

Alterations to shopfronts sometimes results in the disjointed appearance of a building or lost cohesion across a group of buildings. Rather than focusing only on the ground floor shopfront, the consistency of architectural lines and design features of the building itself (including upper stories) and any adjacent buildings should be considered. Historic analysis, a proposed design, scale, proportions and materials should be carefully reviewed to achieve good results. A few key design principles are set out below.

Fig. 024 Lloyds Bank Limited, Hall Quay, Great Yarmouth.



7. DESIGN PRINCIPLES AND GOOD PRACTICE

The design principles noted in this guidance aim to provide general advice.

The retail units throughout the borough of Great Yarmouth have a diverse character derived from their specific locations, historic function, layouts, design traits and development. Historic shopfronts along King Street, for example, significantly differ from the character and appearance of historic retail units along the Seafront. The individual identity of each building should be protected and further enhanced.

A standardised and utilitarian shopfront design approach can result in a poor built environment and the loss of local distinctiveness. The traditional shopping streets where retail and leisure activities have been taking place for decades and even centuries are usually protected by Conservation area designations. Each Conservation Area has a distinctive character and appearance which should be considered whenever a development is being planned.

Even if the building is not listed or is not located in a Conservation Area, its distinctive character should be considered both individually and as part of the specific location, history and environment.

Historic buildings and associated shopfronts should be researched to provide a clear starting point for designing and justifying new interventions.

Any proposed work should aim to preserve the historic character and enhance the appearance of heritage assets and their surrounds. This approach would achieve an individual solution based on appropriate design principles and existing context. A pastiche approach based on simple copying of historical shopfront elements should be avoided.

The style of the shopfront should consider the age and character of the building as a whole. According to some conservation professionals, the shopfront and fascia should correspond to the character of the building (proportions, dimensions, style). In some cases, this might be understood as “close to the original” period, in others, “no earlier than” the specific building period.

Fig. 025 4 Greyfriars Way, Great Yarmouth.





Fig. 026 155-156 High Street, Gorleston.

Historically, shops, shopfronts and fascias (with other elements) may be an original element of a building. In other cases, they are introduced later, and the streetscape becomes a picturesque mixture of architectural styles. This could result in a distinctive street character which may be considered as an element of significance.

High quality materials should be used to support the overall character. As a principle, the type and number of materials should be kept to a minimum and they should be durable and easily maintained. Shiny, reflective materials such as acrylic or plastic, uPVC or plastic laminates, are unsympathetic to the historic environment and should be avoided.

Where a traditional shopfront has

been replaced by an inappropriate and unsympathetic one, the Council encourages improving the design to enhance and preserve the building's character and surroundings.

If there is no evidence of the former traditional shopfront design, or the building is modern, a contemporary design that is sympathetic, distinct to its time and well-integrated within the existing context would be supported. Appropriate use of traditional and sustainable materials in a contemporary style could be explored.

Complete reinstatement of a historic shopfront would be supported if based on sound historical analysis and contextual evidence.

All elements are relevant to each other. A



Fig. 027 Grade II listed buildings, Church Plain, Great Yarmouth.

Sewell House (in the centre) sympathetically converted into a tea room.



Fig. 028 170 High Street, Gorleston.

drawings so the overall impact of the proposed development can be assessed.

The scale and proportion of the shopfront should be relevant to the rest of the building.

Existing shopfronts that contribute to the character and appearance of a building or an area should be retained and conserved, repaired or refurbished, rather than replaced.

Any original features which have been removed or are in a state of disrepair should be restored in a like-for-like manner to enhance the appearance of the shopfront.

Illumination of shop signs, if used or introduced, should be carefully designed and consider the overall design and the surrounding area. Transparency between the street and display, or the interior space of the shop, should be promoted.

Modern construction techniques could present historically unachievable states and outlooks. Whether such an intervention would have been possible historically, and therefore whether the outcome would preserve the building's historic character are important considerations. For example, inserting steel or concrete beams could result in less visual support and a more modern character. Suspended ceilings could relate to oversized fascia and signage.

Converting vacant upper floors for residential use is important for town centre vitality and the viability of historic commercial buildings. Creating access requires careful consideration, as the unsympathetic insertion of doors can harm the historic environment. Where rear access is not possible, access to upper floors may be sensitively accommodated in the street frontage.

shopfront to the building, the building to the street. A stallriser to a window display, a pilaster to the console and fascia. Even if they provide diversity, they should speak to the specific historic character.

Buildings on the street establish an architectural pattern or a grid. Shopfronts should obey that rhythm and correspond to size and dimensions. Even if multiple shops are merged into one, shopfronts should preserve the historic architectural pattern and fabric. Neighbouring properties should be included on elevation

Fig. 029 Street rhythm. Broad Row, Great Yarmouth.



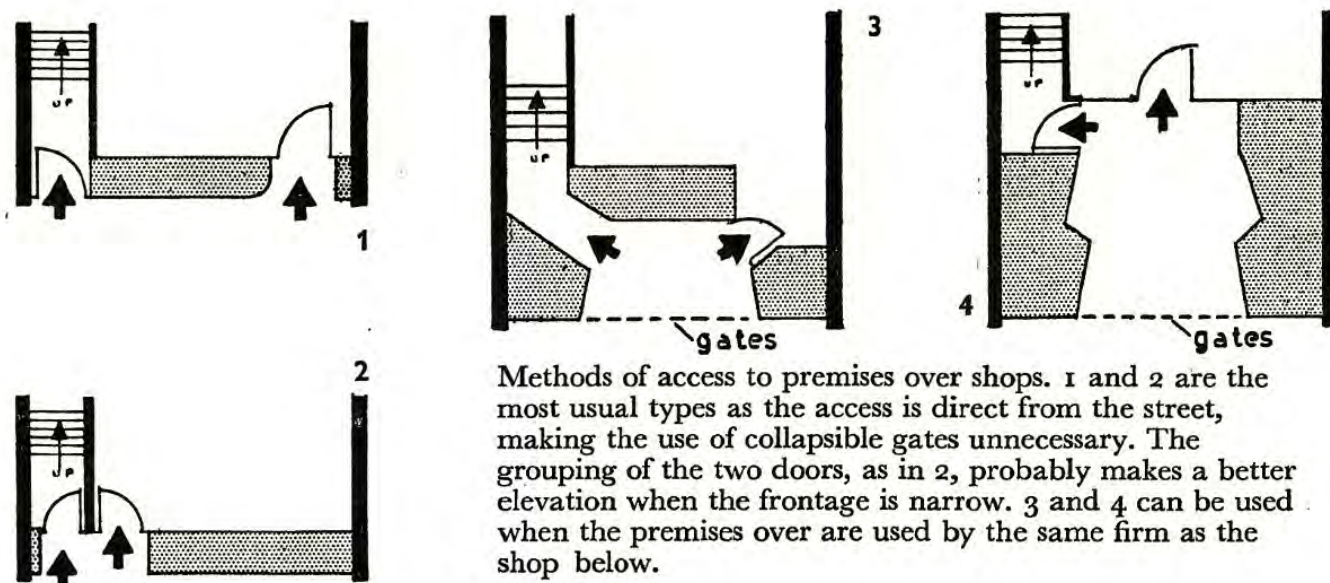


Fig. 030 Variations of access for upper floors.

See figure 30 above for variations of access and door arrangements. 1 and 2 are simpler and are possible options for different style frameworks. 3 and 4 relate to post-war architecture and may be considered for preservation if they exist as part of a shopfront of historical value; new proposals are to be avoided if they present a drastic contrast to the historical character of the area.

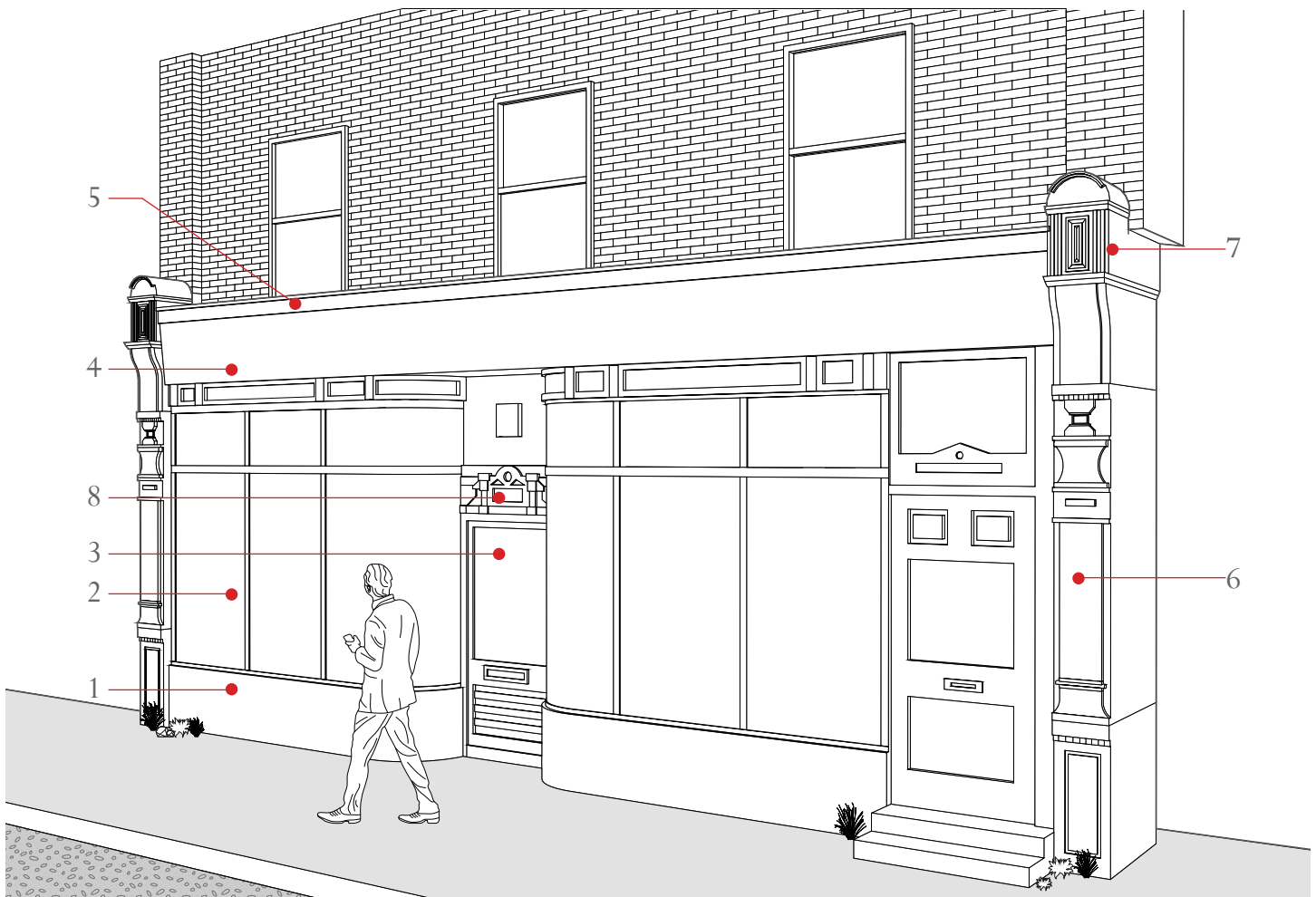
New developments should aim to improve accessibility for everyone and comply with the Equality Act 2010. Any chosen approach or specific design proposal should be backed by sound architectural, conservation and character arguments.

8. ELEMENTS AND CHARACTER

KEY:

- | | |
|-------------------------------|---------------------|
| 1. Stallriser | 5. Cornice |
| 2. Windows And Window Display | 6. Pilasters |
| 3. Doors And Access | 7. Console Brackets |
| 4. Fascia | 8. Fanlight |

Fig. 031 Shopfront elements visual glossary.



STALLRISER

From ground level towards the street, in most Victorian and Georgian cases, a stallriser is used as a base or pedestal for the window. It could serve a number of purposes: protection from damage at a low level; raising the stallboard to a higher level, closer to viewers; concealment of ventilation lattices.

Fig. 032 Timber panelled stallriser.



Fig. 033 Timber panelled stallriser.



Traditional and contemporary materials could vary; however, an effort should be made to correspond to the overall historic character of the street. For example, rendered or timber panels could be acceptable. Stretcher brick bond or cladding should be avoided.

Fig. 034 Ornamented stallriser, Broad Row.



WINDOWS AND WINDOW DISPLAY

The windows and window display are the most important elements, as they serve the purpose of the overall shop and shopfront. They visually connect the street and pavement to the interior of the shop; through the window, customers see the goods, identify what they need or like and are enticed to enter. To preserve the street's historical character and the original purpose of shopfront windows they should not be obscured.

Bright and large scale window posters can result in a cluttered and unwelcoming appearance. Excessive amounts of posters and notices usually weaken the message and harm the appearance of the shop.

The general guidance is that advertisements, window transfers and posters should not obscure more than 20% of the overall shop window and display, but this figure may vary. It is recommended to avoid or reduce the scale and visual impact of any window stickers as far as is practicable.

Other attributes of the shopfront window are the grid and the size of the glass. The overall size of the glass varies through historical periods and this should be considered.

Glazing bars, mullions (vertical members) and transoms (horizontal members),

*Fig. 035 Shopfront with transom lights.
Victoria Arcade, Great Yarmouth.*



may have a specific profile relevant to a historic period. They could subdivide the window into smaller elements that could resonate better with the overall building, street character and specific shopfront. Historically, horizontal emphasis is rare and does not characterise architectural development before the 20th century. Size, shape, and proportions should be carefully considered and augmented.

Transom lights sometimes obscure false shop ceilings, and should be preferred to an oversized fascia. Horizontal elements of the shopfront are the stallriser panels or lattices, but any of these are secondary to the generally vertical window divisions.



*Fig. 036 Colonnnette mullions with spandrels.
Gorleston.*

*Fig. 037 Bow fronted shopfront.
High Street, Gorleston.*



ACCESS, DOORS, TRANSOMS AND FANLIGHTS

Historically, doors matched the overall design and division of the shopfront. The lower panel follows the stallriser, and a transom or fanlight above the door corresponds to the transom lights of the display window. All elements are bound by an appropriate style, relevant to the overall historic character and appearance.

Authentic details should be preserved, including decorative mosaic or marble entrances.



Fig. 039 Entrance lobby mosaic.



Fig. 040 Tiled entrance lobby.

Fig. 038 Entrance lobby tiled in chequerboard pattern.



When a design for a new shopfront is considered, steps should be avoided where possible. All proposed schemes must comply with the Equality Act 2010, Building Regulations and associated guidance and standards.

METALWORK

Existing metal fittings preserving historic character (including handles, door plates, letter boxes etc.) should be retained. Any new fixtures and fittings should aim to match the style of the existing shopfront.

Fig. 041 Shopfront entrance - recessed doors with fanlight in line with the transom lights.



Fig. 042 Hanging signs along Victoria Arcade, structural and decorative metal elements.





Fig. 043 Skipplings Gallery 133 King St, Great Yarmouth.

FASCIA

The purpose of the traditional English shopfront's fascia is to display the name of the shop. The fascia is a separate element, as is the overall shopfront within the building façade. The design should provide enough space between the elements of the elevation. For example, between fascia and first-floor sills.

Traditionally the fascia is not too large, well balanced and proportional to all other elements. It is an element of the overall shopfront and usually should not exceed 400mm, but this figure may vary on a case-by-case basis. Sometimes, when a modern fascia is extra-large it conceals a false ceiling. This should be avoided. The design proposal should explore transom lights in such a case.

The traditional fascia is not a box-like element projecting over the street. It is a flat surface, vertical or tilted outwards (post-1840s) with the top edge projecting over the street. Traditionally, it is found between shopfront windows, with transom lights underneath and a cornice above.

Generally, internally illuminated box-type fascias should be avoided, especially if they are bulky, with full-face illumination and are crudely bolted-on over existing fascia boards. Standardised branding, corporate fascia's and logos may not be appropriate in all cases and scale and appearance may need amendments to complement the character of the shopfront, the building, and the area.

CORNICE

The cornice is the moulded projection along the top of the fascia. The cornice has historical precedents in classical architecture (above the architrave, and often, the frieze) and serves a utilitarian purpose to protect the rest of the building or shopfront from the elements. A traditional shopfront cornice is topped with lead flashing, which should also be used in modern interventions. A cornice is an element of most shopfront designs.

Fig. 044 Hand painted lettering onto the fascia board is the most appropriate form of fascia signage.



Fig. 045 Cornice.



Fig. 046 Fascia angled towards the street - a traditional approach.





Fig. 047 Edwardian pilaster.



Fig. 048 Victorian console brackets.

PILASTERS

The pilaster is a flatter variation of a classical column or pier. Traditionally consisting of a base, shaft and capital. During 19th-century shopfront development, looser interpretations could be seen. They may relate to structural members or may be purely decorative. They could visually support the fascia or the consoles aside from it.

CONSOLE BRACKETS

In Victorian shopfront design, consoles normally frame the fascia and are found above the end pilasters of the shopfront. In some cases, these axes correspond to the overall building width.

MATERIALS

Many historic shopfronts in Great Yarmouth use timber. Some use brick and some have metal frontages. In a small number of cases, stone is used for more elaborate designs or as major elements of new buildings.

Glossy or reflective materials should be used sparingly, if at all.

More information regarding the use of materials, such as recommendations on appropriate timber selection and the use of appropriate paint types for the renovation of historic timber frontages can be found in the document “Details and Good Practice in Shopfront Design” by the English Towns Forum (now the Historic Towns and Villages Forum). Although slightly dated, it is still a useful resource.

COLOUR

The colours of shopfronts are important for the shops, the buildings and the overall historic streetscape. This topic should be approached with caution. If a historic shopfront has been surveyed and would be conserved and repaired, an analysis should be made of the existing colours, normally visible as different layers. These should be documented and could serve as arguments for a specific colour or nuance.

Generally, fluorescent, harsh, lurid colours or schemes with excessive contrast should be avoided. The use of corporate branding colour schemes, regardless of the location, can sometimes result in the erosion of historic character. In such cases, variations

or the use of different proportions of corporate colours may be necessary.

Rich colours in darker and muted tones are usually preferable for most historic contexts, but this should be approached on a case-by-case basis. It is recommended that the chosen colour is based on historic analysis, is harmonious with the building's surroundings and is appropriate to the design and period of the building.

Fig. 049 Traditional timber shopfront with curved glass window. High Street, Gorleston.





Fig. 050 Hanging sign.

SIGNAGE

The traditional fascia's purpose is to bear the name of the shop. In these cases, traditional hand-painted lettering should be used where possible. If a fascia is not present, individual letters forming the shop name could be applied directly on to the wall. A hanging sign in a traditional manner and restricted scale could also be installed. A matt or satin finish is encouraged. Glossy paints should be avoided.

Fig. 052 Hand-painted lettering.



Fig. 051 Internally illuminated box-type fascias should be avoided, especially if they are bulky, with full-face illumination and are crudely bolted-on over the existing fascia board.

ILLUMINATION

Traditionally, lighting is contained within the shop windows.

Internally illuminated box signs should be avoided. Similarly halo lighting where the light source is concealed behind individual letters can appear out of place on historic buildings and in conservation areas. If illumination is required, high-quality, subtle lighting should be installed. Small spotlights or concealed strip lights are options which are more appropriate in historic settings. Lighting should point downwards where possible to minimise light pollution.



Fig. 053 An example of integrated lighting, which is sympathetic to the fascia and doesn't dominate visually.

SECURITY AND SHUTTERS

Before the introduction of roller shutters in the 1840s, the traditional solution was wooden shutters. Today, wooden shutters are among the limited reasonable options to enclose the shopfront windows from the outside.

Historic purpose-made grilles should be preserved. New “open” type grilles could be explored as a security option.

External steel shutters and grilles should be avoided. Regardless of the quality of their design, they have a negative effect on the appearance of the street and

undermine the traditional character of the shopfront and the overall building. External shutter boxes also add to the visual clutter.

Where security requires intervention, toughened glass should be used. Depending on the case, rolling type transparent metal grilles may be acceptable, if they are located inside the shop windows and allow clear visibility into the shop.

Any security alarm fittings should be carefully located to avoid obscuring decorative details or architectural features.

Fig. 054 Internal open lattice grilles.



BLINDS AND CANOPIES

If blinds or canopies are considered, these should be integral to the design of the shopfront, preferably retractable, of good quality materials and appropriate for the architectural style of the building and area. Traditionally, the blinds should be of straight awning type. When not in use, these are concealed in a blind box designed carefully as part of the fascia. For historic shopfronts and listed buildings, a decision should be made on a case-by-case basis.

The bottom of new awnings projecting over the pavement should be at least 1.98m above pavement level.

Dutch-style nonretractable canopies should be avoided. These are usually made of metal frames and canvas and cannot be be concealed in a blind box. They often hide architectural details and can interrupt the elevation of a building. They introduce a prominent shape out of character with the traditional qualities and appearance of the area.



Fig. 055 Integrated blind box with a sprung roller housing a retractable canvas awning. Metal arms allow the blind to extend out and storm chains prevent movement.

The use of plastic 'wet-look' stretch fabric should be avoided.

Fig. 056 Traditional awning.



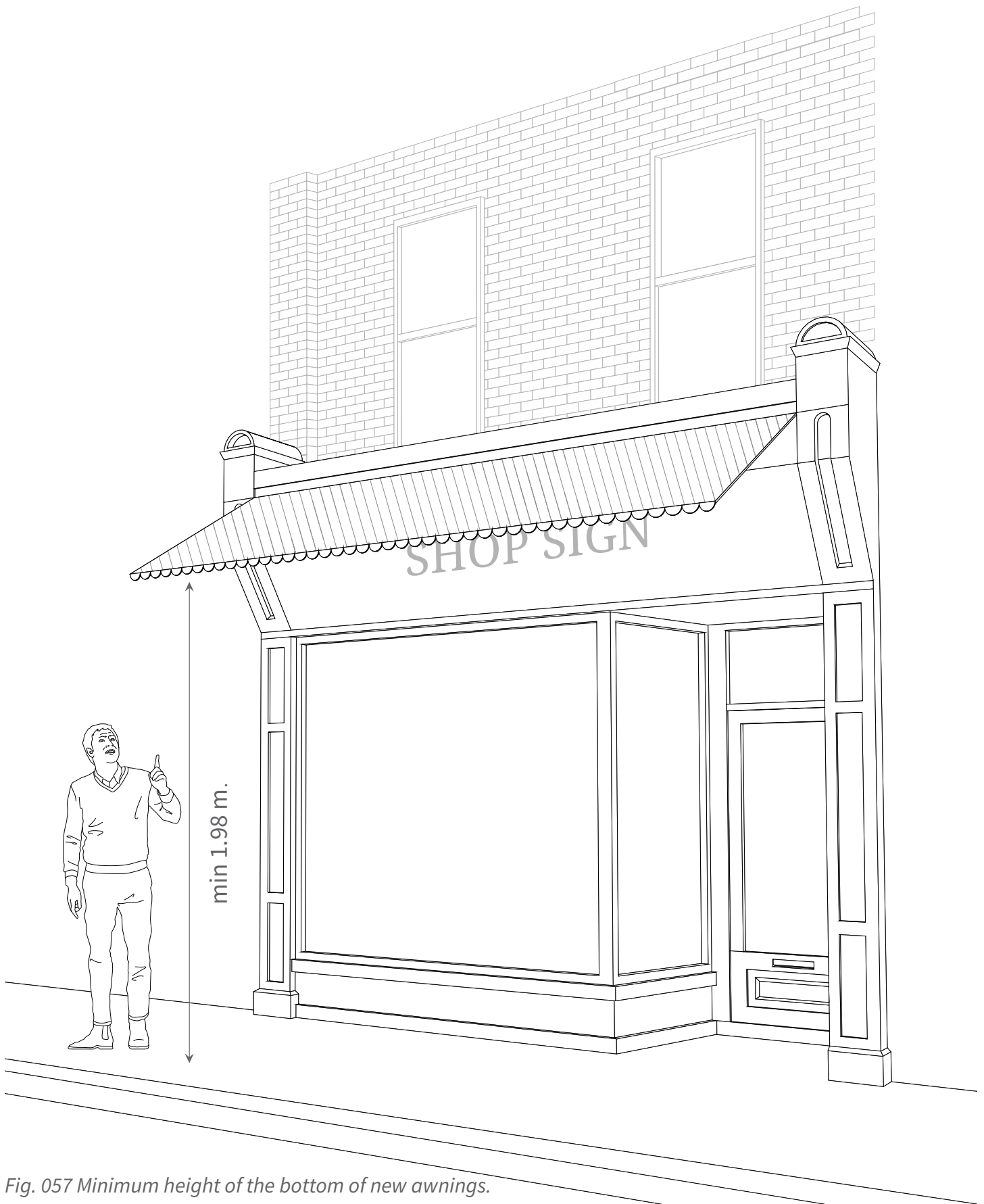


Fig. 057 Minimum height of the bottom of new awnings.

CASH MACHINES/ AUTOMATED TELLER MACHINES (ATMS)

Installation of an ATM should be justified by the shop's use – bank, building society etc.

Cash machines integrated into shops should be placed where they will not disturb the architectural integrity of the facade or interrupt pedestrian passage. In some cases, ATMs are a significant visual interruption to the external appearance of the shopfront. Their placement should be carefully considered, following the basic principles of proportion, scale, and materials.

ATMs could be installed in an internal lobby.

If cash machines must be located on the main facade, their design should be simple - excessive advertising or bright signage should be avoided.

Fig. 058 An example of an ATM, poorly integrated in the shopfront. King Street, Great Yarmouth.





Fig. 059 12 Hall Quay, Great Yarmouth.

CONTEMPORARY DESIGNS

Any period in history could produce shopfronts worthy of preservation, contributing to the character and cultural significance of the street. Existing and contemporary shopfronts of interest should be preserved.

A good, simple, contemporary design that reflects and blends with the historic environment can help enhance the historic character of the building. In some cases, a contemporary interpretation and a new intervention is encouraged in place of imitation or reproduction of a historic period. New materials can be used in moderation, following the principle of contrast. Any new intervention should, however, be carefully considered in terms of its relationship with the host building and the surrounding streetscape. A minimalistic approach to materials, colour and design should be taken when considering new interventions.



Fig. 060 Contemporary shopfront to a historic building, Norwich.

9. CASE STUDIES

CASE STUDY 1 SIGNAGE AND ADVERTISEMENTS

A Georgian building with a later shopfront which has been unsympathetically altered. There is a passageway (Row) next to the shop.

Harmful interventions include:

- Automated Teller Machine (ATM) is installed to the window glass at the right
- Excessive lettering and signage result in visual clutter
- Additional signage and advertising material installed to windows resulting in poor appearance
- Fluorescent tube lights are installed to the fascia contributing further to the visual clutter

To improve the appearance of the heritage asset and the effect of the shopfront on the surrounding Conservation Area, it would be recommended to restrain the amount of advertisements and eliminate any additional elements which detract from the character and appearance of the building.

Fig. 061 Unsympathetic alterations to a historic building.



- ATMs should ideally be located in internal lobbies or in the least obtrusive location.

- A hand-painted fascia sign of appropriate scale is the best option. Signage should appear as an integral part of the shopfront design. As an alternative to hand-painted signage, individual lettering could be mounted onto the fascia. In this example, there is a single sign displaying the name of the business and the fascia is not overloaded with additional information.

- Lighting units are discrete and well-integrated to prevent interference with the appearance of the building.

- If window graphics are needed to provide additional information, these should not cover large areas of the glazing and should be proportional to the windows, the shopfront and the building as a whole. Obtrusive designs should be avoided.

Fig. 062 Proposed improvements.





Fig. 063 Poor shopfront alterations.

CASE STUDY 2 STREET SCENE

This case study looks at common issues along historic shopping streets where there is an established visual rhythm.

The image above displays a street scene with:

- Continuous fascias across several buildings, resulting in loss of visual rhythm.
- Oversized signage which has a negative impact on the character and appearance of the historic area.
- Inconsistency with the established vertical rhythm on the first and second floors of existing historic buildings.



Fig. 064 Proposed improvements.

Some of these issues are resolved in the above image.

- Shopfronts visually relate to the building, to the existing streetscape and the area. Their design and layout is not considered in isolation but as a part of the entire elevation of the building, its appearance and the wider rhythm and architecture of the street.
- Subdivision of individual shopfronts reinstates the vertical rhythm of the buildings and street.
- Size of signage is proportional to the scale of the fascia.



Fig. 065 Poor shopfront design.

CASE STUDY 3

Listed buildings with 20th century shopfronts to ground floor and accommodation above:

- Shopfront to the left (20th century) with additional metal grilles resulting in visual clutter.
- Shopfront in the middle (later 20th century)
- Shopfront to the right (early 20th century) with window graphics to entire glazing covering up mullions and transoms; visually intrusive signage to fascia.



Fig. 066 Proposed improvements.

To improve the street scene:

- External security grilles are removed and positioned internally or toughened glass is installed.
- Signage is of appropriate size proportional to the existing fascia
- Window graphics are removed or kept to a minimum. Existing glazing bars are revealed and original features enhanced.

10.

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11. LIST OF FIGURES AND SOURCES

Figures 004-006 [Great Yarmouth Local History and Archaeological Society]

Figures 001, 012, 021, 022, 023, 024, 025, 033, 034, 040, 045, 047, 048, 051, 059 [Lenko Grigorov]

Figure 43 [GYPT archive, photograph by Pete Huggins]

Figures 002, 031, 057, 061-066 [Antonina Tritakova]

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Figure 008-010 [H. Dan , English Shop-Fronts..., 1907]

Figure 011 [Watercolour by Philip Norman, 1928. Museum of London]

Figure 013 [Steve Cadman, 2007; flickr.com]

Figure 014 [B. and N. Westwood, The Modern Shop, 1952]

Figure 015 [Kathryn A. Morrison, English shops and Shopping, 2004]

Figure 016 [<https://www.wallpaper.com/watches-and-jewellery/bonhams-grimajewellery-auction-interview-francescagrima>]

Figures 017-019 [Nicholson, The New Practical Builder and Workman's Companion, 1823]

Figure 020 [british-history.ac.uk]

Figure 030 [B. and N. Westwood, The Modern Shop, 1952]

APPENDIX A

LEGISLATIVE

REQUIREMENTS

Listed Building Consent is needed whenever you wish to alter anything to the exterior or interior of a listed building. Alterations to buildings that are adjacent to or adjoin listed buildings also require Listed Building Consent.

Planning Permission is required for any alterations or changes which would materially affect the character and appearance of a commercial building in a conservation area.

Like-for-like repairs and restoration may not require Listed Building Consent or Planning Permission. Any alterations should be discussed at the earliest stage with Development Control, Great Yarmouth Borough Council. Accurate working drawings of the proposed work should be submitted for inspection and assessment.

The display of advertisements is subject to a separate advertisement consent process within the planning system. There are a number of classes of advertisement that have either deemed or express consent under The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 No 783 (for example, advertisements which are incorporated into the fabric of a building for which planning permission was obtained, or an advertisement relating to a local government election).

Any advertisements not falling within these classes will require advertisement consent. Advertisements are controlled with reference to their effect on amenity and public safety only, so the regime is a lighter touch than the system for obtaining Planning Permission or Listed Building Consent for development.

The full list of Planning Application Forms, Guidance Notes and Validation Check Lists are published on the Council's website:

www.great-yarmouth.gov.uk/article/2439/Planning-forms

More information on Advertising boards and display of goods on the highway in Great Yarmouth can be found following the link below:

www.great-yarmouth.gov.uk/guide-to-advertising-boards-and-highway-displays

A summary on Advertisement Consent and Heritage has been published by Historic England: www.historicengland.org.uk/advice/hpg/consent/advertisementconsent/

Guidance on advertisements has been published by the Ministry of Housing, Communities and Local Government:

www.gov.uk/guidance/advertisements#requirements-for-consent

To check if your building is Listed, you

can search the National Heritage List for England (NHLE). The following link will direct you to Historic England's online search: www.historicengland.org.uk/listing/the-list/

To check if your building is in a conservation area, you can visit Great Yarmouth Borough Council's website or search the interactive map.

A link to the GYBC conservation areas webpage:

www.great-yarmouth.gov.uk/conservation-areas

A link to the GYBC conservation areas interactive map:

<https://gybc.maps.arcgis.com/apps/InformationLookup/index.html?appid=d8814b16f530420892bd45b860723f09>

APPENDIX B

USEFUL CONTACTS

Development Management – Planning Applications Team

To see if you need planning permission or for enquiries about making a planning application, please contact the Development Management Team:

plan@great-yarmouth.gov.uk

Phone: 01493 846242

Conservation Team

To obtain advice on Conservation issues, please contact the Conservation Team:

conservation@great-yarmouth.gov.uk

Phone: 01493 846761

Heritage Action Zone Project Manager

To obtain advice for grants, please contact the HAZ Project Manager:

Lou Robson

lou.robson@great-yarmouth.gov.uk

Phone: 07425621842

Building Control Team

For advice relating to Building Regulations, please contact the Building Control Team:

buildingcontrol@great-yarmouth.gov.uk

Phone: 01493 846396

APPENDIX C

POLICY

FRAMEWORK

The National Planning Policy Framework (NPPF, July 2021) outlines the significance of town centres and their vitality, the aspirations to achieve well-designed places as well as the importance of conserving and enhancing the historic environment.

Shopfronts form an essential part of the town centre. Their design and appearance make a significant contribution to the architectural characteristics of the borough's built environment and further contributes to the sense of place. The appropriate design of shopfronts in historic environment can further enhance the heritage assets whilst providing diverse and rich street scene, signifying local distinctiveness, engaging with residents and visitors and contributing to the economic vitality of the area.

The Shopfront design guide provides advice on shopfronts within the borough's historic environment and outlines principles that would encourage sympathetic design and good quality architecture. The NPPF sets out that heritage assets are "an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations". (paragraph 189) The Shopfront design guide also encourages good quality contemporary development in historic areas, buildings and settings which would preserve the significance of heritage assets, make a positive contribution to the

assets or better reveal their significance. (paragraph 206, NPPF)

Paragraph 197 of the NPPF states that in determining applications account should be taken of the desirability to sustain and enhance the significance of heritage assets as well as to establish viable uses which should be consistent with the conservation of the assets. The paragraph also refers to the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality.

In Chapter 12 of the NPPF it is set out that "good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this." (Paragraph 126). The NPPF further highlights in paragraph 128 the benefits of design guides and codes which provide a local framework "for creating beautiful and distinctive places with a consistent and high quality standard of design." A significant part of the planning policies and decisions for new developments is to ensure that interventions are visually attractive and promote good quality architecture whilst being sympathetic to the local character and history, including the surrounding built environment and landscape setting. The NPPF outlines in paragraph 134 that 'Development that is not well designed should be refused, especially where it fails to reflect local design policies and

government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes.’

The NPPF sets out in paragraph 136 that ‘The quality and character of places can suffer when advertisements are poorly sited and designed.’ The advertisements are operated by a separate consent process within the planning system and advice on design of advertisements and procedures are explained in the Shopfront Design Guide.

The Local Policy Framework further highlights the importance of high-quality design which would preserve heritage assets and contribute to local character and distinctiveness. Policy CS1 – Focusing on a sustainable future, sets out the aspiration to look favourably towards new development and investment that successfully contributes towards the delivery of “Distinctive places that embrace innovative, high quality urban design that reflects positive local characteristics and protects the borough’s biodiversity, unique landscapes, built character and historic environment”.

Encouraging well-designed distinctive places and the conservation of local heritage assets are some of the Council’s main goals as set out in policies CS9 and CS10. Welcoming, well preserved historic built environment and areas which embrace sympathetic, informed, good quality development can contribute to sustainable growth, support the local

economy, strengthen local centres as well as promote tourism, leisure and culture.

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