

CONSULTATION STATEMENT –Draft Shopfront and Advertisement Supplementary Planning Document (SPD) (March 2017)

In connection with the preparation of the Shopfront and Advertisement SPD, a Consultation Statement is required to demonstrate with whom the Council consulted and how they engaged with local people and other interested parties during the preparation stages of the SPD. The statement contains the following information:

- i) a summary of the organisations with whom the Councils consulted;
- ii) how those organisations were consulted;
- iii) a summary of the issues raised; and
- iv) how those issues have been addressed in the SPD.

A seven week consultation on the draft Shopfront and Advertisement SPD took place between **31st March and 19th May 2017**.

The following consultees were sent either a letter or email providing a link to the Council's website to view the SPD. Comments were invited on the draft SPD:

Statutory organisations and Prescribed bodies under Duty to Cooperate	40
Organisations/developers on Consultee database by email	Approx.1000
Ward Councillors	72

In addition to being published on the Council's websites, paper copies of the draft revised SPD were distributed to all main libraries throughout Dudley Borough, at the Council's planning offices reception at 4 Ednam Road Reception and Dudley Council Plus.

As detailed in paragraphs 178-181 of the National Planning Policy Framework, public bodies have a Duty to Co-operate on strategic planning issues that cross administrative boundaries. The prescribed bodies under Duty to Cooperate were therefore consulted in relation to the draft revised SPD. We had a very constructive meeting with the West Midlands Police to discuss the contents of the document and they made some useful suggestions and changes to the document which have been incorporated in the document.

An e-bulletin containing information about the consultation on the document was sent out by Council's Communication and Public Affairs (CAPA) team which reaches 66000 people. The link relating to Shopfront and Advertisement SPD was opened by 156 people.

A total of 8 representations were made on the draft SPD.

Shopfront and Advertisement SPD- Consultation Responses

Name of the Consultee	Page/Para No	Comments/Observations	Local Authority Response
Hagley Parish Council	Whole of the document	No comments to make in relation to the document.	Noted.
Highways England	Whole of the document	No comments to make in relation to the document.	Noted.
Historic England	Whole of the document	<ul style="list-style-type: none"> • Support the principle of the Shopfront and Advertisement and consider it to be beneficial in retaining historic features and enhancing local identity and cultural heritage. • The detail in terms of contemporary examples and photographic evidence. • Welcome the many references to the historic environment and the need to protect and enhance heritage assets as 	Support welcomed.

		<p>well as historic features and character.</p> <ul style="list-style-type: none"> • Support varied guiding principles that refer and relate to the historic environment, through designated heritage assets to historic features. • Welcome reference within the document to where listed building consent would be required to ensure clarity is provided. 	
Historic England	Whole of the document	The reference to 'English Heritage' should be amended to 'Historic England'.	Comments noted and required changes have been made.
Miss Angela Gray	Question 1: Do you agree that shopfronts and advertisements are an essential contributor to the communication of the quality of both our centres and the business that occupy them and that they play crucial role in creating an attractive setting for retailing and	The respondent agree that shopfronts and advertisements are essential contributors to the communication and quality of the centres.	Comments welcomed.

	reinforcing competitive advantage? If not, please explain why.		
Miss Angela Gray	Did Chapter 2 provide a helpful overview of the history of the shopfront? If not, please explain why.	Shopfronts do have history, although the time and resources finding out that don't one dubious, when the marketing and rental execution find that the changes provide an economic and social benefit, Equality Act 2010 Disability Discrimination Act 1995.	Comments noted. No change required
Miss Angela Gray	Are there any additional comments on this document that you would like	The respondent questioned the need for a public consultation in public libraries. The respondent also questioned as to what extent the peoples' views are taken into account in document production.	Public consultation has been undertaken a part of the statutory consultation which is required under the provisions of Town and Country Planning Act (2010) (Revised 2015). No change required
Network Rail	Whole of the document	No comments to make in relation to the document.	Noted.
Warwick County Council	Whole of the document	No comments to make in relation to the document.	Noted.
West Midlands Police	Principle SF11-Blinds and canopies	Add an additional bullet point to read <i>"Should not obstruct natural surveillance or interfere with CCTV cameras"</i> .	Comments noted and the first bullet point of Principle SF11 (Page 33) to be amended to read <i>"Where proposals seek to incorporate an externally fixed blind on an existing shopfront, they should be sited as discreetly as possible in order to minimise their</i>

Comment [j1]: I don't understand this?

Comment [a2]: Jo I need to chase this one.....

			<i>bulk and visual clutter and should not obstruct natural surveillance or interfere with CCTV cameras". .</i>
West Midlands Police	Paragraph 2.43	Additional wording should be added to paragraph 2.43 to read <i>"Installed to the Link ATM Safer Working Group (ATMSWG) Recommended ATM Physical Security Guidelines document. Any applications for an ATM in the borough should be brought to the attention of the West Midlands Police Design out Crime Officer for specific advice linked to the ATMSWG"</i> .	Comments noted and additional wording has been incorporated to the end of Paragraph 2.43 to read <i>"Installed to the Link ATM Safer Working Group (ATMSWG) Recommended ATM Physical Security Guidelines document. Applications for an ATM in the borough should be brought to the attention of the West Midlands Police Design out Crime Officer for specific advice linked to the ATMSWG"</i> .
West Midlands Police	Principle SF12- Cash Dispenser's	Bullet point d of Principle SF12 should be amended to read "Where possible, cash dispensers should be sited in locations that will provide security through <i>natural surveillance of the ATM itself. Wide pavements contribute to security of users and provision of a privacy area. They should not be close to Bus Stops, Public Payphones and places where potential criminals could legitimately loiter.</i> "	Comments noted and additional wording has been added to bullet Principle SF12 point d to read <i>"ATMs should not be in an area where the user is 'boxed in' and has no natural surveillance. ATMs should be sited in locations that will provide security through passive/ natural surveillance. Wider pavements contribute to security of users. They should not be located in close proximity to Bus Stops, Public Payphones</i>

			<i>or places considered to be hotspots for antisocial behaviour and where groups can easily loiter.”</i>
West Midlands Police	Principle SF12- Cash Dispenser's	Add an additional bullet point e to read <i>“Any building that the ATM is installed in should itself be in a good state of repair, and have a good standard of physical security”.</i>	Comments noted and bullet point e has been added to Principle SF12 to read <i>“Any building that the ATM is installed in should itself be in a good state of repair, and have a good standard of physical security”.</i>
West Midlands Police	Principle SF12- Cash Dispenser's	Add an additional bullet point f to read <i>“Access for replenishment vehicles and personnel is key, and easy access for the used to replenish ATM's is a key consideration. See the ATMSWG guidance”.</i>	Comments noted and bullet point f has been added to Principle SF12 to read <i>“Easy access for replenishment vehicles and personnel is a key consideration and accordingly adherence to the ATMSWG guidance is required”.</i>
West Midlands Police	Principle SF12- Cash Dispenser's	Add an additional bullet point h to read <i>“ATM's should not be in an area where the user is 'boxed in' and has no natural surveillance.</i>	Comments noted and bullet d has been amended to read <i>“ATMs should not be in an area where the user is 'boxed in' and has no natural surveillance.....”</i> .
West Midlands Police	Paragraph 2.53	Paragraph 2.53 should be amended to read <i>“The security of retail and business premises is an important issue which is recognised as being of importance to owners and occupiers. Security measures are one way of addressing this threat. The Secured by Design initiative (Police Crime Prevention Initiatives 2016 Ltd) seeks to encourage improved security</i>	Comments noted and paragraph 2.53 has been amended to read <i>“The security of retail and business premises is an important issue which is recognised as being of importance to owners and occupiers. Security measures</i>

		<p><i>through natural surveillance and advocating practical ways to incorporate crime prevention measures within the design of new shopfronts or the refurbishment of existing ones. The ‘Secured by Design’ approach is nationally accepted and is always preferred to the implementation of physical barriers. West Midlands Police Design out Crime Officer can assist with implementation of the guidance from Secured by Design”.</i></p>	<p>are one way of addressing this threat. The Secured by Design initiative (Police Crime Prevention Initiatives 2016 Ltd) seeks to encourage improved security through natural surveillance and advocating practical ways to incorporate crime prevention measures within the design of new shopfronts or the refurbishment of existing ones. The ‘Secured by Design’ approach is nationally accepted and is always preferred to the implementation of physical barriers. West Midlands Police Design out Crime Officer can assist with implementation of the guidance from Secured by Design in conjunction with the Local Planning Authority”.</p>
West Midlands Police	Paragraph 2.54, bullet point 1	<p>The first bullet point of paragraph 2.54 should be amended to read <i>“Security should always be carefully considered at the design stage, adopting a risk based approach and guidance around the Secured by Design approach”;</i></p>	<p>Comments noted and the first bullet point in paragraph 2.54 has been amended to read “Security should always be carefully considered at the design stage, adopting the ‘Secured by Design’ approach and using a risk based assessment of what is necessary.”</p>
West Midlands	Paragraph	Additional second bullet point should be added	Comments noted and additional

Police	2.55	to read " <i>The glass should be of BSEN356:2000 and 2a specification for the minimum requirement to be met;</i> "	bullet point has been added to read " <i>The glass should be of BSEN356:2000 and 2a specification for the minimum requirement to be met;</i> "
West Midlands Police	Paragraph 2.55	Paragraph 2.55 should be renumbered to 2.54.1 and in the fourth bullet point the word toughened or should be deleted and the paragraph should be amended to read " Toughened <i>Laminated glass provides security without generally affecting the appearance of the property</i> ".	Comments noted and the first sentence of the fourth bullet point of paragraph 2.55 has been amended to read: " <i>Laminated glass provides security without generally affecting the appearance of the property</i> ".
West Midlands Police	Paragraph 2.55	Additional seventh bullet point should be added to read " <i>Any CCTV or alarm should be installed to standards set out by bodies such as British Security Association, Security Systems and Alarms Inspection Board (SSAIB) or National Security Inspectorate NSI</i> ".	Additional bullet point nine has been added to paragraph 2.55 to read " <i>Any CCTV or alarm should be installed to standards set out by bodies such as British Security Association, Security Systems and Alarms Inspection Board (SSAIB) or National Security Inspectorate NSI</i> ".
West Midlands Police	Paragraph 2.56	In paragraph 2.56, add additional line should be added to read " <i>With layering approach to include Doors, Locks, Windows, Glass & Glazing all to a standard of (PAS24), testing as per the standards set out in most appropriate the Secured by Design Industry guide</i> ".	Comments noted and additional line has been added to paragraph 2.56 to read " <i>With layering approach to include Doors, Locks, Windows, Glass & Glazing all to a standard of (PAS24), testing as per the standards set out in most appropriate the Secured by</i> "

			<i>Design Industry guide</i> ".
West Midlands Police	New paragraph 2.61	Under the heading Internal Roller Shutters additional paragraph should be added to read <i>"All shutters or grills regardless of type should be of a standard set out by LPS1175, LPS2081 (SR 'A') or STS201 (BR2). The internal shutters should be compliant with the minimum standard of SR2. The West Midlands Police Design out Crime Officer should be consulted if necessary for advice around testing standards suitable for the deployment based on risk"</i> .	Comments noted and additional wording has been added at the end of paragraph 2.61 to read <i>"All shutters or grills regardless of type should be of a standard set out by LPS1175 LPS2081 (SR 'A') or STS201 (BR2). The internal shutters should be compliant with the minimum standard of SR2.. The West Midlands Police Design out Crime Officer should be consulted if necessary for advice around testing standards suitable for the deployment based on risk"</i> . has been added.
West Midlands Police	Paragraph 2.62	At the end of paragraph 2.61 add <i>"see 2.61"</i> .	Comments noted however it is not considered that it is necessary to add any additional wording as the document is to be read and considered as a whole.
West Midlands Police	Paragraph 2.63	At the end of paragraph 2.63 add an additional line to read <i>"Any installation should be fitted using anti-tamper security fittings"</i> .	Comments noted and additional line has been added to paragraph 2.63 to read <i>"Any installation should be fitted using anti-tamper security fittings"</i> . .
West Midlands Police	Paragraph 2.64	The penultimate line of paragraph 2.64 should be amended to read <i>"All shutters or grilles regardless of type should be of a standard set out by LPS1175 or LPS2081 (SR 'A') or STS201 (BR2)"</i> .	Comments noted and the penultimate line has been amended to read <i>"All shutters or grilles regardless of type should be of a standard set out by LPS1175</i>

			<i>or LPS2081 (SR 'A') or STS201 (BR2".</i>
Worcestershire Regulatory Services	Whole of the document	No comments to make in relation to the document.	Noted.