

Appendix 3- Schedule of Representations and Council's Response

List of Organisations/Individuals

- 1 Coal Authority
- 2 Ms Sarah Mutesi Kibedi NBJKMN
- 3 The Theatres Trust
- 4 Highways Agency
- 5 Cadogan Estates
- 6 ADKC
- 7 Sainsbury Supermarkets
- 8 Sloane Stanley Estate
- 9 Knightsbridge Association
- 10 CAFE
- 11 Kensington Society
- 12 Planning and Green Infrastructure, Future London Programme
- 13 British Waterways London
- 14 National Grid
- 15 EM Pedraz-Estevez

Note: New text is indicated by *italics*

Org.	Para/ Section	Summary of Comments	Suggested Changes	Officer's response to submitted comments	Officer's Recommendations
1	N/A	Having reviewed your document, I confirm that we have no specific sites to put forward for this document at this stage.	N/A		No changes to SPD
2	N/A	?	N/A		No changes to SPD
3	N/A	Due to the specific nature of the Trust's remit we are concerned with the protection and	N/A		No changes to SPD

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		promotion of theatres and as this consultation is not directly relevant to the Trust's work, we have no comment to make but look forward to being consulted on further LDF documents.			
4	N/A	The HA have reviewed your SPD and has no comments on the document at this time.	N/A		No changes to SPD
5	3.2.5	<p>The final sentence in paragraph 3.2.5 states the following:</p> <p style="text-align: center;">“Existing independent access should be retained and the Council will require the reinstatement of independent access in new and replacement shopfronts”.</p> <p>Whilst the Estate recognises the importance of retaining independent access to upper floors to ensure they are used efficiently, the Design Guide should acknowledge that the rationalisation of access to upper parts of the building to increase retail frontage contributes to increasing the vitality and viability of retail centres.</p>	<p>The Estate therefore requests that the final sentence in paragraph 3.2.5 is reworded as follows:</p> <p style="text-align: center;">“The Council will require the incorporation of independent access in new and replacement shopfronts”.</p>	It is understood that the respondent seeks to ensure flexibility to rationalise access to upper floors of a building in order to increase the visibility/expanse of retail frontage. Policy CL2(o)v of the Adopted Core Strategy requires new, and alterations to existing shopfronts to: provide independent access to upper floor accommodation. The SPD needs to be consistent with this policy.	No changes to SPD

Org.	Para/ Section	Summary of Comments	Suggested Changes	Officer's response to submitted comments	Officer's Recommendations
	3.3.1.6	Paragraph 3.3.1.6 relates to fascias and sets out specific guidance for their size and siting. The Estate requests that reference is made within this paragraph to the traditional high quality glass fascia sign. Whilst such fascias are highly reflective, historic examples of this type of fascia are very attractive and characterful.	The Estate requests that reference is made within this paragraph to the traditional high quality glass fascia sign.	It is acknowledged that Victorian shopfronts sometimes had attractive glass fascias.	Amend the final paragraph under 3.3.1.6 to read: "Highly reflective signage on fascias should normally be avoided. <i>Exceptions may be made to where Victorian painted glass fascias are being restored or faithfully copied</i> ".
	3.3.1.12 - 14	<p>Paragraph 3.3.1.12 advises that stallrisers provide emphasis to the base of the shopfront presenting a robust structural element. Paragraph 3.3.1.13 sets out general guidance on the height for stallrisers.</p> <p>It should be noted that stallrisers are not considered as being a 'structural' element of a building or shopfront. Historically, stallrisers or sills vary in height according to the needs of the particular retail occupier. Recent trends towards uniform medium height stallrisers do not reflect the past variety of designs and are often in conflict with the retail occupiers need to display their products and services.</p>	Consequently, the Estate considers that the Shopfront Design Guide should recognise that a variety of approaches to the heights of sills, frames and stallrisers is necessary.	<p>The respondent raises a valid point. Whilst a stallriser is a feature of a traditional shopfront, its height can vary dependent on the previous/historic use of the shopfront.</p> <p>This is acknowledged somewhat in the text of Paragraph 3.3.1.13, which states that: "<i>In general stallrisers should not....</i>"</p> <p>And further in Paragraph 3.3.1.14, which states: "<i>New and replacement shopfronts in traditional buildings should incorporate a stallriser. The choice of depth will depend on</i></p>	Insert into the 'Stallrisers' section, Paragraphs 3.3.1.11 – 3.3.1.15 text and images to clarify the historical range in stallriser height, which was dependent on the use of the store. However, the current guidance in this section still holds true for the majority of retail stores.

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				<p><i>the overall design and should be influenced by the depth of the fascia (in order to provide balance to the shopfront”.</i></p> <p>Historically variations in the height of the stallriser were attributed to the function of a shop. In particular, fishmongers, butchers and grocers in particular would have had higher stallrisers than other retail stores (which would have otherwise been relatively uniform within this category or consistent with the height of the base of their pilasters). This was so these retailers could display their wares at either a reasonable eye level or required the height to ensure their produce would not be spoiled by direct sunlight, which would be shielded by a corresponding blind or canopy.</p> <p>For clarity, text or images to this effect can be inserted into the SPD to explain how this occurred historically.</p>	

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	3.3.1.14	<p>“New and replacement shopfronts in traditional buildings should incorporate a stallriser”.</p> <p>There are a number of examples within the Royal Borough of original period shopfronts in traditional buildings which do not have stallrisers. The Estate therefore considers that the requirement for stallrisers in all new shopfronts in traditional buildings is unreasonably prescriptive.</p>	N/A	<p>The text in this part of the SPD referred to by the respondent reads: “<i>...in traditional buildings...</i>”</p> <p>The guidance set out in Paragraph 3.3.1.14 applies to shopfronts in traditional buildings. This is because the framework of the traditional shopfront exists in these buildings. Therefore it is prudent for traditional styled shopfronts to be maintained in these locations. Council will generally look for a traditional styled shopfronts in these locations. This approach will apply for replacement shopfronts.</p> <p>For new shopfronts that arise in existing traditional buildings, this approach should be considered and will be pursued in instances where there is a preponderance of stallrisers within the parade in question.</p>	<p>Insert as the second sentence in Paragraph 3.3.1.14: “<i>This will be pursued in instances where there is a preponderance of stallrisers within the parade in question</i>”.</p> <p>Also insert into the end of the last sentence of Paragraph 3.3.1.14: “<i>and the depth of existing adjoining stallrisers in the parade</i>”.</p>
	3.3.1.18	This paragraph relates to	N/A	This part of the SPD provides	Insert the word:

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		transoms which divide the window at the same level as the line between the door and the door light. The Estate would like to highlight that there are a number of examples of original period shopfronts in traditional buildings within the Royal Borough which do not have a transom dividing the window at the same level as the line between the door and the door light. Indeed, the illustration provided on page 32 of the draft Shopfront Design Guide shows an example of a shopfront with no transom dividing the window. The Estate considers that the requirement for transoms is unreasonably prescriptive.		<p>guidance on how transoms were used in traditional shopfronts. Should they be restored, the SPD indicates where they should be located.</p> <p>The text is not considered unreasonably prescriptive.</p> <p>The illustration on page 32 of the SPD is primarily an image to illustrate accessibility measures.</p>	‘Generally’ at the start of Paragraph 3.3.1.18.
	3.3.1.56	Paragraph 3.3.1.56 advises that external lighting should be fixed to the fascia and painted to match the fascia or made of brass. It is considered that this requirement is unreasonably prescriptive given that alternative metal finishes may be appropriate in many cases.	N/A	This part of the SPD indicates the preferable design responses when using external lighting units so they do not result in the introduction of clutter. Other finishes may be appropriate and will be assessed on a case by case basis.	<p>We can insert the word “preferably” so that it reads:</p> <p><i>“Such lighting should be fixed to the fascia (not the building) and preferably painted to match the fascia or made of brass”.</i></p>
	3.3.2.1	This paragraph states that nearly all new shop fronts on recent buildings and in new buildings	N/A	The intention of this section is to indicate that a traditional approach to shopfront design is	No change to SPD

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		<p>should be contemporary design. The Estate considers that this requirement is too prescriptive, especially for post war buildings where this is likely to have a detrimental impact on the overall appearance of the character of the building.</p>		<p>not expected on recent buildings.</p> <p>Ideally the shopfront should be part of, and/or consistent with the overall design of the building in which it is located. Therefore there is no expectation that a shopfront in a recent building should have to contrive a traditional appearance. Any shopfront should be in keeping with both the building in which it is located and the remainder of the shopping parade.</p>	
	3.3.3.4	<p>Paragraph 3.3.4 sets out the requirements for internal ramps when changes of level at entrances are unavoidable. The accommodation of ramped access to shops should reflect the size of the premises in question. If the diagram provided on page 31 of the Design Guide was applied to a small shop, a substantial proportion of retail floorspace would be compromised as a step would be needed in the shop up to a depth of 3.9 m back from the shopfront. The Estate therefore considers that it is important that access is</p>	N/A	<p>This is a valid point. The size of the shop may preclude the insertion of a new internal ramp.</p>	<p>Amend third paragraph of 3.3.3.4 by adding the following text to the end of the first sentence: “<i>or restricted floor area or layout</i>”.</p>

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		considered in the context of the size of the shop for which this would be appropriate.			
6	3.3.3.1	<p>There should be a section in the guide pointing the shop owners in the direction of the Access and Design guide which has a lot of information on how to make sure buildings are accessible to everyone.</p> <p>There should be a section in the Shopfront design guide saying that local disabled people should be consulted and a clear reference to the access design guide for further information. Whether this has been followed should be checked when the planning application is made.</p>	Add a paragraph in the 'access' section, paragraph 3.3.3.1 about ADKC access group and the Access and Design Guide. To respond to ADKC access group comments after consultation period.	<p>Additional reference to The Royal Borough of Kensington and Chelsea Supplementary Planning Document: Access Design Guide 2010 can be inserted to direct people to consult it in conjunction with the Shopfront SPD.</p> <p>It may be relevant to seek specialist advice on a case by case basis.</p>	Add the following text after 3.3.3.1: <i>"The Royal Borough of Kensington and Chelsea Supplementary Planning Document: Access Design Guide 2010 provides more detailed guidance on how an inclusive and accessible environment within the Borough can be achieved. This document should be read in the context of accessibility considerations for new shopfronts and alterations to shopfronts. Relevant specialist advice will be sought when available"</i> .
7	3.3.1.6	Durable, low maintenance vinyl, Perspex and glass reinforced plastics can be appropriate in certain, unique circumstances.	This document should allow for some flexibility in circumstances where a ridged approach may not be appropriate.	It is considered that the respondent should instead be referring to Paragraph 3.3.1.29 which discuss materials instead of 3.3.1.6, which discusses fascias.	No change to SPD

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				<p>The text of Paragraph 3.3.1.29 does not set out such a rigid approach as suggested by the respondent by using the words: "The widespread use of synthetic materials.....</p> <p>The SPD seeks to discourage the use of these synthetic materials, but the text is already worded to indicate there may be circumstances where some use of synthetic material may be permitted.</p>	
	3.3.1.29	Durable, low maintenance vinyl, Perspex and glass reinforced plastics can be appropriate in certain, unique circumstances.	This document should allow for some flexibility in circumstances where a ridged approach may not be appropriate.	As per above	No change to SPD
	3.3.1.4	<p>SSL agree that if shop units are combined the individuality of distinct buildings should be maintained as a far as it is reasonably possible to do so.</p> <p>However to explicitly say that a fascia should never stretch uninterrupted (3.3.1.4, p19) across a number of architectural</p>	N/A	Extended fascias stretching across more than one shopfront undermine the architectural framework of a building and can have negative effects on the wider shopping parade/high street. This approach will always be resisted.	No change to SPD

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		units it too prescriptive. A site by site approach should be adopted, if a proposed façade improves the existing façade of a building and crosses two units at the same time it should be considered rather than dismissed out of hand.		It is recommended that should an Applicant seek to pursue this type of design/development within the Borough they will have to put forward a case to prove it will not be detrimental to the building in which it is located and the wider shopping parade/high street. As such the text in the SPD should remain as it is.	
	3.2.5	<p>The final sentence in paragraph 3.2.5 states the following:</p> <p>“Existing independent access should be retained and the Council will require the reinstatement of independent access in new and replacement shopfronts”.</p> <p>Whilst the Estate recognises the importance of retaining independent access to upper floors to ensure they are used efficiently, the Design Guide should acknowledge that the rationalisation of access to upper parts of the building to increase retail frontage contributes to</p>	<p>The Estate therefore requests that the final sentence in paragraph 3.2.5 is reworded as follows:</p> <p>“The Council will require the incorporation of independent access in new and replacement shopfronts”.</p>	<p>It is understood that the respondent seeks to ensure flexibility to rationalise access to upper floors of a building in order to increase the visibility/expanse of retail frontage. Policy CL2(o)v of the Adopted Core Strategy requires new, and alterations to existing shopfronts to: provide independent access to upper floor accommodation. The SPD needs to be consistent with this policy.</p>	No change to SPD

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		increasing the vitality and viability of retail centres.			
	3.3.1.6	Paragraph 3.3.1.6 relates to fascias and sets out specific guidance for their size and siting. The Estate requests that reference is made within this paragraph to the traditional high quality glass fascia sign. Whilst such fascias are highly reflective, historic examples of this type of fascia are very attractive and characterful.	N/A	It is acknowledged that Victorian shopfronts sometimes had attractive glass fascias.	Amend the final paragraph under 3.3.1.6 to read: "Highly reflective signage on fascias should normally be avoided. <i>Exceptions may be made to where Victorian painted glass fascias are being restored or faithfully copied</i> ".
	3.3.1.12 - 3.3.1.14	Paragraph 3.3.1.12 advises that stallrisers provide emphasis to the base of the shopfront presenting a robust structural element. Paragraph 3.3.1.13 sets out general guidance on the height for stallrisers. It should be noted that stallrisers are not considered as being a 'structural' element of a building or shopfront. Historically, stallrisers or sills vary in height according to the needs of the particular retail occupier. Recent trends towards uniform medium height stallrisers do not reflect the past variety of designs and are often in conflict with the retail occupiers need to display	Consequently, the Estate considers that the Shopfront Design Guide should recognise that a variety of approaches to the heights of sills, frames and stallrisers is necessary.	The respondent raises a valid point. Whilst a stallriser is a feature of a traditional shopfront, its height can vary dependent on the previous/historic use of the shopfront. This is acknowledged somewhat in the text of Paragraph 3.3.1.13, which states that: " <i>In general stallrisers should not....</i> " And further in Paragraph 3.3.1.14, which states: " <i>New and replacement shopfronts in traditional buildings should</i>	Insert into the 'Stallrisers' section , Paragraphs 3.3.1.11 – 3.3.1.15 text or images to clarify the historical range in stallriser height, which was dependent on the use of the store. However, the current guidance in this section still holds true for the majority of retail stores.

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		their products and services.		<p><i>incorporate a stallriser. The choice of depth will depend on the overall design and should be influenced by the depth of the fascia (in order to provide balance to the shopfront”.</i></p> <p>Historically variations in the height of the stallriser were attributed to the function of a shop. In particular, fishmongers, butchers and grocers in particular would have had higher stallrisers than other retail stores (which would have otherwise been relatively uniform within this category or consistent with the height of the base of their pilasters). This was so these retailers could display their wares at either a reasonable eye level or required the height to ensure their produce would not be spoiled by direct sunlight, which would be shielded by a corresponding blind or canopy.</p> <p>For clarity, text or images to this effect can be inserted into</p>	

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				the SPD to explain how this occurred historically.	
	3.3.1.14	<p>“New and replacement shopfronts in traditional buildings should incorporate a stallriser”.</p> <p>There are a number of examples within the Royal Borough of original period shopfronts in traditional buildings which do not have stallrisers. The Estate therefore considers that the requirement for stallrisers in all new shopfronts in traditional buildings is unreasonably prescriptive.</p>	N/A	<p>The text in this part of the SPD referred to by the respondent reads: “<i>...in traditional buildings...</i>”</p> <p>The guidance set out in Paragraph 3.3.1.14 applies to shopfronts in traditional buildings. This is because the framework of the traditional shopfront exists in these buildings. Therefore it is prudent for traditional styled shopfronts to be maintained in these locations. Council will always look for a traditional styled shopfronts in these locations. This approach will apply for replacement shopfronts.</p> <p>Should new shopfronts arise in traditional buildings, this approach should be considered.</p>	No change to SPD
	3.3.1.18	This paragraph relates to transoms which divide the window at the same level as the	N/A	This part of the SPD provides guidance on how transoms were used in traditional	No change to SPD

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		line between the door and the door light. The Estate would like to highlight that there are a number of examples of original period shopfronts in traditional buildings within the Royal Borough which do not have a transom dividing the window at the same level as the line between the door and the door light. Indeed, the illustration provided on page 32 of the draft Shopfront Design Guide shows an example of a shopfront with no transom dividing the window. The Estate considers that the requirement for transoms is unreasonably prescriptive.		shopfronts. Should they be restored, the SPD indicates where they should be located. The text is not considered unreasonably prescriptive. The illustration on page 32 of the SPD is primarily an image to illustrate accessibility measures.	
	3.3.1.56	Paragraph 3.3.1.56 advises that external lighting should be fixed to the fascia and painted to match the fascia or made of brass. It is considered that this requirement is unreasonably prescriptive given that alternative metal finishes may be appropriate in many cases.	N/A	This part of the SPD indicates the preferable design responses when using external lighting units so they do not result in the introduction of clutter. Other finishes may be appropriate and will be assessed on a case by case basis.	We can insert the word “preferably” so that it reads: <i>“Such lighting should be fixed to the fascia (not the building) and preferably painted to match the fascia or made of brass”.</i>
	3.3.2.1	This paragraph states that nearly all new shop fronts on recent buildings and in new buildings should be contemporary design. The Estate considers that this	N/A	The intention of this section is to indicate that a traditional approach to shopfront design is not expected on recent buildings.	No changes to SPD

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		<p>requirement it too prescriptive, especially for post war buildings where this is likely to have a detrimental impact on the overall appearance of the character of the building.</p>		<p>Ideally the shopfront should be part of, and/or consistent with the overall design of the building in which it is located. Therefore there is no expectation that a shopfront in a recent building should have to contrive a traditional appearance. Any shopfront should be in keeping with both the building in which it is located and the remainder of the shopping parade.</p>	
	3.3.4	<p>Paragraph 3.3.4 sets out the requirements for internal ramps when changes of level at entrances are unavoidable. The accommodation of ramped access to shops should reflect the size of the premises in question. If the diagram provided on page 31 of the Design Guide was applied to a small shop, a substantial proportion of retail floorspace would be compromised as a step would be needed in the shop up to a depth of 3.9 m back from the shopfront. The Estate therefore considers that it is important that access is considered in the context of the size of the shop for which this</p>	N/A	<p>Additional reference to The Royal Borough of Kensington and Chelsea Supplementary Planning Document: Access Design Guide 2010 can be inserted to direct people to consult it in conjunction with the Shopfront SPD.</p> <p>It may be relevant to seek specialist advice.</p>	<p>Add the following text after 3.3.3.1: <i>“The Royal Borough of Kensington and Chelsea Supplementary Planning Document: Access Design Guide 2010 provides more detailed guidance on how an inclusive and accessible environment within the Borough can be achieved. This document should be read in the context of accessibility considerations for new shopfronts and alterations to shopfronts. Relevant</i></p>

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		would be appropriate.			<i>specialist advice will be sought when available</i> ".
9	N/A	Support the comments made by Michael Bach			Please refer to the responses set out under No. 11 of this table.
10	N/A	Unfortunately due to limited resources we are unable to comment on this document.			N changes to SPD
11	1.1.3	<p>Need for a stronger lead policy in the Core Strategy to provide clear direction for the SPD</p> <p>The Society strongly supports the Council's position that <i>"emphasis should also be placed on ensuring high standards of design for all shopfronts, be they traditional, modernist or contemporary in style"</i>, but consider that this is statement is too passive – we need to drive up the quality of shopfront design. The document is excellent with regard the retaining and (perhaps) improving traditional shopfronts, but does not capture what we consider should be the strategy – to drive up the quality of shopfronts and the streetscape of our town centres.</p>	<p>We feel strongly that there is a need for a strong overall strategy statement – a big picture vision – that, following a lead policy in the Core Strategy to drive up the overall quality for all shopfronts in order to improve the attractiveness and competitiveness of the Borough's town centres, and that the SPD should be the vehicle for delivering this. At the moment the Core Strategy does not have such a policy specifically related to driving up the quality of shopfronts and, therefore, the draft SPD cannot introduce this as a policy. The starting point must be a strong policy in the Core Strategy. We are proposing this at the Examination in Public.</p>	<p>Any suggested changes to the policy set out in the Core Strategy are outside the remit of this SPD.</p> <p>It is considered that Policy CL2(o)ii of the Core Strategy which reads: <i>"Require new, and alterations to existing shopfronts to have a positive visual impact on the appearance of the building or streetscene"</i> could be expanded upon in the SPD to reinforce the message of improving the quality of shopfronts, as well as the streetscape and our town centres.</p>	<p>Insert a new paragraph after 1.1.1 to read: <i>"The Design Guide seeks to ensure shopfronts throughout the Borough contribute positively to the identity and quality of our built heritage and streetscapes. High quality shopfronts are expected in all our town centres, high streets and shopping parades. As required by Policy CL1 of the Core Strategy, the opportunity will be taken where possible to improve the quality of shopfronts"</i>.</p> <p>Amend the start of existing Paragraph 1.1.2 to</p>

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					read: <i>"This document does not promote any particular style..."</i>
	1.0.3		<p>Propose the following change to text:</p> <p>Para 1.0.3...<i>This Design Guide is intended to promote an improvement in the overall quality and attractiveness of the public realm or our town centres by requiring greater care to be taken in shopfront design in order to:</i></p> <ul style="list-style-type: none"> • <i>maintain the character and appearance of traditional shopfronts;</i> • <i>ensure that changes to existing shopfronts secure improvements to design and access; and</i> • <i>improve the quality of new shopfronts designs so they respect and enhance their surroundings</i> 	It is considered that the matters raised by the respondent in their Suggested Changes further reiterates their comments set out above for Paragraph 1.1.3. It is felt that the new text in the associated Officer's recommendations satisfies their suggested changes	No change to SPD
	1.1.1		Propose the following change to	It is agreed that we should	Insert 'public houses' after

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			<p><i>text:</i></p> <p>Para 1.1.1 ...<i>This guidance is applicable to shopfronts in the general sense, including the frontage of restaurants, pubs, banks, estate agents and other similar uses which occupy the ground floor of buildings especially those so town centres...</i></p>	include public houses in Paragraph 1.1.1. However to specifically pick out those in town centres may dilute the overall intention of the SPD which is to ensure high quality, well designed shopfronts within all of the Borough.	the word 'restaurant' in Paragraph 1.1.1.
	1.1.2		<p>After para 1.1.2 add new lead policy:</p> <p><i>The Council will take the opportunity provided by proposals for new shopfronts or for modifications to existing shopfronts to drive up the quality of shopfronts and to improve the appearance of the Borough's town centres.</i></p> <p><i>To deliver this the Council will require all proposals for shopfronts, whether new shopfronts or alterations to existing shopfronts, fascia and signage, to improve the quality of the shopfront and to contribute to upgrading the appearance of the centre and the Borough's streetscape.</i></p>	It is outside the remit of the SPD to introduce new policy. It is considered that the new text recommended to be inserted after Paragraph 1.1.1 as indicated above, which reads: <i>"The Design Guide seeks to ensure shopfronts throughout the Borough contribute positively to the identity and quality of our built heritage and streetscapes. High quality shopfronts are expected in all our town centres, high streets and shopping parades"</i> satisfies the intentions of the suggested changes proposed by the respondent.	No change to SPD
	3.1.1(b)		We suggest that open shopfronts should be discouraged and the	It is felt that the existing text: <i>"Open shopfronts are generally</i>	No changes to SPD

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			last sentence reworded to <i>"open shopfronts are to be discouraged"</i> . Open shopfronts should be discouraged for both noise and energy consumption reasons. This is particular an increasing problem with restaurant/pubs where the open/fully glazed shopfront is installed increasing both the energy consumption and the late night noise/disturbance. This will be aligning with policies on sustainability and energy consumption.	<i>not acceptable</i> is sufficient.	
	3.1?	Within the section on existing shopfronts there is no reference to existing shopfronts which are no longer in use as shops or the original shop, but are listed for an historic reference to its previous use. There are many such cases, including the Diary Queen on Queensdale Road or Chards at 102 Gloucester Road. The loss of such historic shopfronts such be resisted.		The respondent has drawn attention to an infrequent but significant issue. Amend paragraph 3.2.2.	Insert the following text to the end of the second sentence in Paragraph 3.2.2: <i>"...even when the use of the premises has changed from the original"</i> .
	3.1.1(e)	There is reference to the <i>"economic sense for shopfronts to be accessible to all user groups"</i> . It may be economic sense but it is also a legal requirement. There should be reference here to the statutory requirements and both	Add: <i>Whenever an existing shopfront is being modified, the opportunity for securing level access should be fully explored.</i>	The text is written to provide a more 'well-rounded' approach to ensuring access for all in shopfront design. Reference to the RBKC Access Design Guide is provided in chapters elsewhere that address access	No change to SPD

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		the regulations for compliance as well as the allowances for non-compliance.		specifically – Part 3.3.3. It is felt that the existing text covers the same matter as that suggested by the respondent.	
	3.2		The Kensington Society propose that there be a statement which confirms the Council requirement for an overall drive for improvement in standards – this might be the placed to put or repeat it. 3.2. New subsection: <i>A High Standard of Design for all New Shopfronts.</i> <i>Where shopfronts within new developments or within existing buildings are proposed they should contribute to the improvement of the character and visual amenity of the area.</i>	It is agreed that a high quality of design for all shopfronts should be a desired outcome of the SPD.	Insert a new desired outcome in section 3.2 to read: 3.2.x:A High Standard of Design for All Shopfronts. All shopfronts whether in new developments or within existing buildings should contribute positively to the character and visual quality of their surroundings.
	3.2.8	There is a statement that: <i>“Particular considerations to bear in mind include:</i> · <i>the extend of glazing used on shop windows</i> · <i>the use of air curtains</i> · <i>illumination levels (signage and interior)</i> · <i>air conditioning</i>	<i>In assessing proposals for new or modified shopfronts the Council will seek to limit/restrict:</i> · <i>the extent of glazing used on shop windows</i> · <i>the use of air curtains - to seasonal use where in winter months not allowed</i> · <i>illumination levels (signage and interior) - limits to</i>	This part of the SPD seeks to encourage energy efficiency and green building standards for shops. It is should be acknowledged that a number of the considerations listed in this section can only be encouraged. The Council does not have the authority to enforce a number of these.	Amend the second sentence of Paragraph 3.2.8 to read: “Designs that embrace such measures are <i>encouraged, however it is acknowledged that many of these measures are outside the remit of planning control</i> ”.

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		<p>· <i>the use of open refrigeration units.</i></p> <p>These are all issues that should influence the acceptability of proposals. The Council should be flagging this up – it is an opportunity to state that all of these issues where the Council will resist, control or mitigate the proposals.</p>	<p><i>be set</i></p> <p>· <i>air conditioning only for totally enclosed premises without open glazed fronts or air curtains</i></p> <p>· <i>the use of open refrigeration units limited to a proportion of the total.</i></p>	<p>They have been included in the SPD as advice on areas where shops could be more energy efficient, however it is up to proprietors themselves to incorporate these measures.</p> <p>Amend this paragraph to indicate that most of the energy efficiency measures are outside planning control.</p>	
	3.2.9		<p>Change: <i>Encouragement will be given to the restatement of missing features, these will be required wherever possible for traditional, historic shopfronts.</i></p>	<p>Paragraph 3.2.9 discusses measures to reduce energy consumption. It is suggested that the respondent should instead be referring to 3.2.3 (The Retention of Architectural and Traditional Shopfront Features).</p> <p>It is felt that the current wording reflects the intention of the design guide with respect to the reinstatement of missing features. The extent to which Council will seek to influence the reinstatement of missing features will be taken on a case by case basis.</p>	No change to SPD.
	3.2.10		<p><i>The content of signs should generally be kept to a minimum.</i></p>	<p>There is a typo in this paragraph. The last two words</p>	Amend the fourth sentence of Paragraph

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			<i>Fascia signs should typically only contain the name of trader and the street number. If necessary the nature of the trade may also be indicated. Excessive signage, superfluous content on signage, as well as profuse advertisements and posters result in shopfronts appearing cluttered and unwelcome and will be resisted. Banners on railings and advertisements covering over most or the entire shop front window will be controlled and refused permission.</i>	should read: " are unwelcome ". It is agreed that that posters on other parts of an associated building and/or structures can detract from a tidy appearance.	3.2.10 to read: "...profuse advertisements and posters <i>whether on the shopfront or adjacent walls, fences or railings</i> result in shopfronts appearing cluttered and unwelcome.
			COMMENT: we do not understand why Figure 1 and Figure 4 are the exact same drawing. We would suggest that it would be more helpful to annotate Figure 5 with comments on where the shopfront in the middle labelled Fruit and Veg does not comply with policies. A photograph of the Tesco's on Holland Park Avenue would illustrate a shopfront which conforms to the terrace architecture and the streetscape.	Figures 1 and 4 are very similar, they were used to illustrate the shopfront framework, which is referred to in the main body text in these two parts of the SPD (hence the figure was used twice). It is agreed we can rationalise this figure and use a different diagram, such as a photo to illustrate	Update SPD with new diagram
	3.3.1.5	We are equally concerned that the issues highlighted in the approval for the Santander		The respondent raises a valid concern that relates to area-specific examples of shopping	Add as the last paragraph to Paragraph 3.3.1.6 (green text): " <i>In some</i>

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		<p>signage on Kensington High Street be permitted on a fascia which was free of signage and that the blade sign was allowed to be installed in the fascia which until that time had not had blade signs. These needs to be addressed in 3.3.1.5: <i>Fascias are perhaps the most noticeable feature of shopfronts. They play a dual role in both communicating the name, trade and number of the shop and forming an important design element in the 'framework' of the shopfront</i>". This is only the case when the fascia is an individual element within each shopfront. When it is a unifying, continuous and uninterrupted fascia across the entire frontage it is a unifying element but NOT A SIGNAGE FACILITOR. As in Kensington High Street individual shop front must have their own signage and the overall element and unifying architectural element not be compromised. There must be a case by case or terrace or street scape by street scape approach...not one solution will</p>		<p>parades.</p>	<p><i>locations, for example Kensington High Street. Blocks of Twentieth Century mansion blocks have shops on the ground floor with consistent flat fascias which were designed to be free of advertising. This character should be respected.</i></p> <p>Add further image to illustrate this point.</p>

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		fit all.			
	3.3.1.6		second para : <i>The depth of the fascia should be in scale and in alignment with the other elements of the building.</i>	It is unsure in alignment with what, the Respondent is seeking.	No change to SPD
	3.3.1.6		Third para: in the illustrations nowhere is the "corbel" noted. It is assumed it is the "console/bracket" but should be noted as "corbel" as well on the Figure 1 and Figure 4.	Agreed, amend figures to include the words 'corbel'.	Amend Figures 1 and 4 accordingly.
	3.3.1.6		Third para: <i>Where corbel no longer exist, their reinstatement should be considered/ will be required.</i>	It is considered that the current text is appropriate. Such cases may also depend on how the shop and the remainder of the shops have changed over time.	No change to SPD
	3.3.1.8		<i>Pilasters should always be incorporated into the design of tradition shopfronts. The width of pilasters will vary between shopfronts, but will normally include a base, capital, and /or console bracket. Where a new shopfront is proposed, they the pilaster should not be obscured nor painted half and half between shopfronts.. The opportunity should be taken to reinstate missing or removed pilasters where possible.</i>	The colour of shopfronts other than on Listed Buildings is not subject to planning control. Any advice cannot be enforced.	Add a paragraph after 3.3.1.10 to read: <i>'The painting of pilasters or corbels 'half and hal' between shopfronts should be avoided'.</i> Talk to DMcD again...is it really that bad?

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			To understand the importance of the half painted pilaster see the photograph on page 11. There is a pilaster painted half green and half dark blue and the effect destroys the importance of the pilaster.		
	3.3.1.14		<i>New and replacement shopfronts in traditional buildings should incorporate a stallriser. The choice of dept will depend on the overall design and materials and should be influenced by the depth of the fascia</i>	The depth of a stallriser is not directly a consequence of the materials used.	No Change to SPD
	3.3.1.20	We are not sure what is meant by this statement. Is it proposing that if <i>“anti-social behaviour”</i> is evident then doors are not required to be flush to the shopfront. How is it proposed that <i>“anti-social behaviour”</i> is proven?		In such situations, it would be up to the Applicant to demonstrate that an un-recessed door is appropriate for their location. We would rely on evidence from our Community Crime Prevention Design Advisor to confirm this.	No Change to SPD
	3.3.1.25	We do not understand nor agree with the requirement to recess slightly the entrance to the <i>“independent access”</i> . Why is this necessary?		As indicated in paragraph 3.3.1.25 of the SPD, a slightly recessed door for access into the upper floors of a building is done to ‘denote its secondary function along a retail street’. This is an established method	No Change to SPD

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				which assists with articulating the primary and secondary features on the ground floor of buildings.	
	3.3.1.29		Add: <i>Where existing but in poor condition reinstatement and repair will be required.</i>	This will not always be the case. The requirement to retain shopfronts of quality is already dealt with under 3.2.2.	No Change to SPD
	3.3.1.32	We are not entirely in agreement with the statement “ <i>natural or anodised aluminium weathers badly</i> ”. It does when poorly specified. it can be and is a fine and acceptable material		Natural aluminium almost always looks poor on shopfronts. The quality of anodising varies.	Insert the following into the last sentence of 3.3.1.32 after the word ‘or’: “ <i>some forms of</i> ”.
	3.3.1.34	They can be lively additions to the streetscape provided that they are designed <i>to be in proportion to the scale of the shopfront and as an integral part of the shopfront and are confined to the extent of the shopfrontage. to it. Graphics should be minimised and not used as advertisement.</i>	The following Paragraph – 3.3.1.35, states the need for canopies/blinds to be compatible with the character of the building – in terms of their size, shape and position. It is considered that the remainder of the suggested changes are already stated in Paragraph 3.3.1.34.	No Change to SPD
	3.3.1.38		<i>All projecting blinds/ canopies/awnings should be in proportion to the scale of the shopfront.</i>	This is already stated in Paragraph 3.3.1.35	No Change to SPD
	3.3.1.44		<i>Where fascia signs are acceptable the fascia signs are to be most obvious sign and feature of a</i>	The respondent raises a valid concern that relates to area-specific examples of shopping	It is felt that this is addressed by the response to an earlier

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			<p><i>shopfront. Where fascia signs are not part of the over all terrace, fascia signs are not allowed.</i></p>	<p>parades.</p>	<p>consultation point with respect to Paragraphs 3.3.1.5 and 3.3.1.6, where the following was recommended:</p> <p>Add as the last paragraph to Paragraph 3.3.1.6 (green text): <i>"In some locations, for example Kensington High Street, blocks of Twentieth Century mansion flats have shops on the ground floor with consistent flat fascias which were designed to be free of advertising. This character should be respected.</i></p> <p>Add further image to illustrate this point.</p>
	3.3.1.47		<p><i>Large areas of glazing can be a useful location for shop signs, which can be painted or etched onto the internal surface of the windows. Signage behind the shop window may be encouraged as a more discreet solution where use of the area above the window is</i></p>	<p>It is agreed that this paragraph should make reference to the use of 'excessive' decals covering windows.</p> <p>This excessive type of advertising should be discouraged where subject to</p>	<p>Add the following to Paragraph 3.3.1.47 after the last sentence: <i>"However, large areas of advertising or painting behind glass can stifle a frontage".</i></p>

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			<i>inappropriate (such as on the north side of Kensington High Street between Hornton Street and Holland Park). Full painted or etched windows which totally obscure the interior are discouraged and should be avoided. Excessive decals covering the windows advertising a product are to be resisted.</i>	control. Web links to other area-specific guidance will be listed in the Shopfronts SPD.	
	3.3.1.49		<p>We disagree that hanging or projecting signs can be used to list <i>relevant information</i>. Traditional these signs were indicative signs noting the uses such as three balls for a pawn shop or glasses for an ophthalmologist.</p> <p>3.3.1.49 <i>Projecting or hanging signs should be simple and limited to the name of the show or a graphic indication of the type of shop</i>. In Conservation Areas or on Listed</p>	We agree with this point.	<p>Change text in Paragraph 3.3.1.49 to read as follows:</p> <p>3.3.1.49 Projecting or hanging signs should be simple and limited to the <i>name of the shop or a graphic indication of the type of shop</i>. In Conservation Areas or on Listed</p>
	<u>3.3.1.50</u>		<p>Second bullet: <i>Hanging signs should be located below the level of the first floor windows sill and in such a position as not to damage or obscure corbels or architectural details. Sign should</i></p>	<p>It is considered that the current text indicates that signs should not be located on corbels.</p> <p>The projection distance of 1.2m is consistent with previous</p>	<p>No change for the second bullet point.</p> <p>No change to the sixth bullet point.</p>

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			<p><i>not be located on the corbel or fascias where the fascia is free of signage.</i></p> <p>Sixth bullet: <i>Hanging signs should not project more than 1m (3.28 ft) from the face of shopfront. If other projecting existing exist the proposed new sign should be in aligned and not project beyond the existing</i></p>	<p>shopfront design advice by the Borough and the London Building Acts. It is unsure the suggested 1m is based upon. The guidance here requires all signs to be no more than 1.2m. There is no rationale why this should be relaxed.</p>	
	3.3.1.52	<p>We do not agree that internally-illuminated neon projecting signs are acceptable. The illustration on page 28 give clear examples of unacceptable signage and should be refused. Illuminated neon signs are also too deep and out of proportion to the traditional projection sign.</p>	<p>3.3.1.52 <i>Illuminated individual letters will be resisted. Back light signs of a minimum depth will be concerned case by case.</i></p>	<p>Paragraph 3.3.1.51 specifies that “illuminated box fascias or projecting signs will be resisted”.</p> <p>The images referred to by the respondent were intended to show what types of signs are not desirable.</p> <p>For clarification the illuminated individual letters referred to in Paragraph 3.3.1.52 are not neon signs.</p>	<p>Insert new text into the caption concerning neon signs to read: “All neon signs will be resisted”.</p> <p>Insert a new image to visually show the signage described in Paragraph 3.3.1.52 for clarification.</p>
	3.3.1.56	<p>Why is brass the only acceptable metal?</p>	<p>We suggest the last sentence should read: Such lighting should be fixed to the fascia (not the building). When the <i>fascia is free of any signage or lighting the lights are not be fixed to the</i></p>	<p>Paragraph 3.3.1.56 primarily discusses fascia signs.</p> <p>It is understood the respondents comments relate to parades of shops where the</p>	<p>Amend the first sentence of Paragraph 3.3.1.56 to read: “...and where illumination may be appropriate <i>for signage on fascias , halo lighting....</i>”</p>

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			<p><i>fascia.</i> and painted to match the fascia or made of a metal <i>sympathetic to the metals of the building.</i></p>	<p>fascia is clear of signs (such as along Kensington High Street).</p> <p>The text can be amended to reflect that this paragraph refers primarily to shopfronts with signs on their fascias.</p>	<p>Amend the last sentence of Paragraph 3.3.1.56 to read: “Such lighting should be fixed to the fascia (not the building) and <i>be painted to match the fascia and/or be complementary to the materials of the shopfront</i>”.</p> <p>Add a further sentence to the end of Paragraph 3.3.1.56 to read: <i>“In instances where a parade of shops have been designed to have ‘fascia-free’ signage (such as along stretches of Kensington High Stree), this should be respected, and signage on such fascias will be resisted”.</i></p>
	3.3.2		<p>The photograph at the bottom of page 29 is a poor example of a good shopfront. The top line of the fascia does not align with the right hand side, the side columns are of different dimensions.</p>	<p>The fascia on the right hand side of this particular shopfront is actually a vehicle entrance to the rear of the buildings.</p>	<p>Amend photo.</p>

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			There are not examples of acceptable lighting of the projection signs or the facades. This would be helpful.		
	4.1.2		If the existing shopfront is a distinctive and well designed one <i>the replacement or major changes will be resisted. If has fallen into despair, then restoration and repair work should be all that is required.</i>	This part of the SPD provides advice on how to approach shopfront design, rather than supplementing planning policy which is the focus of Part 3 of the SPD. As such, it is considered that the text in its current form is appropriate	No change.
	4.2.1		<i>Page 35 bullet point 4. Can the existing shopfront be repaired or restored or reinstated?</i>	Is there a presumption from the respondent that all shopfronts are either traditional shopfronts or worthy of either being repaired, restored or reinstated in their current form. This approach does not take into account shopfronts that are not currently well designed and the opportunity to install a new shopfront is an opportunity to improve the existing.	Add to point No.4, so that it reads: "Can the existing shopfront be repaired or restored?"
	4.4.3		Photographs should be required whether a new proposal or an old	It is agreed that it is important to show the design treatment	Insert text after the words: "Photographs of

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			or even if no shop front exist. The evidene of the adjoining building is important. Omit <i>(unless you are designing for a new-build or there is no existing shop front)</i> .	of shopfronts and/or parts of the building adjacent to an Applicants own shopfront.	the existing shopfront" to read: <i>"and adjoining premises"</i>
	General	<p>Finally, we consider that the guide should:</p> <ul style="list-style-type: none"> • provide more visual guidance of good and bad design illustrating how the individual elements should be handled; • provide more examples of how particular problems have been successfully handled, such as the stone fascia in Kensington High Street with no signage, either fascia or projecting signs or Tesco in Holland Park Avenue and Gloucester Road to show how house style can be adapted to the architecture 		<p>We are cautious to include 'bad design' examples found in the Borough as to not defame any businesses.</p> <p>It is possible to include images of Kensington High Street to show how the integrity of the stone fascia has been respected by shop signage. It is also possible to include an image of further good examples of how corporate house styles have been adapted to better respect the building/shopfront framework they are located within.</p>	<p>Include further images to show:</p> <ul style="list-style-type: none"> - Kensington High Street stone fascias - Tesco at Holland Park or Gloucester Road
12	N/A	No comments to make			

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13	N/A	No comments to make			
14	N/A	No comments to make			
15	3.3.1.26	Lettering: Should be consistent including and not provocative as in some cases: i.e hanging signs and so on		The Council has no control over the wording of signs. Only style, size and illumination.	