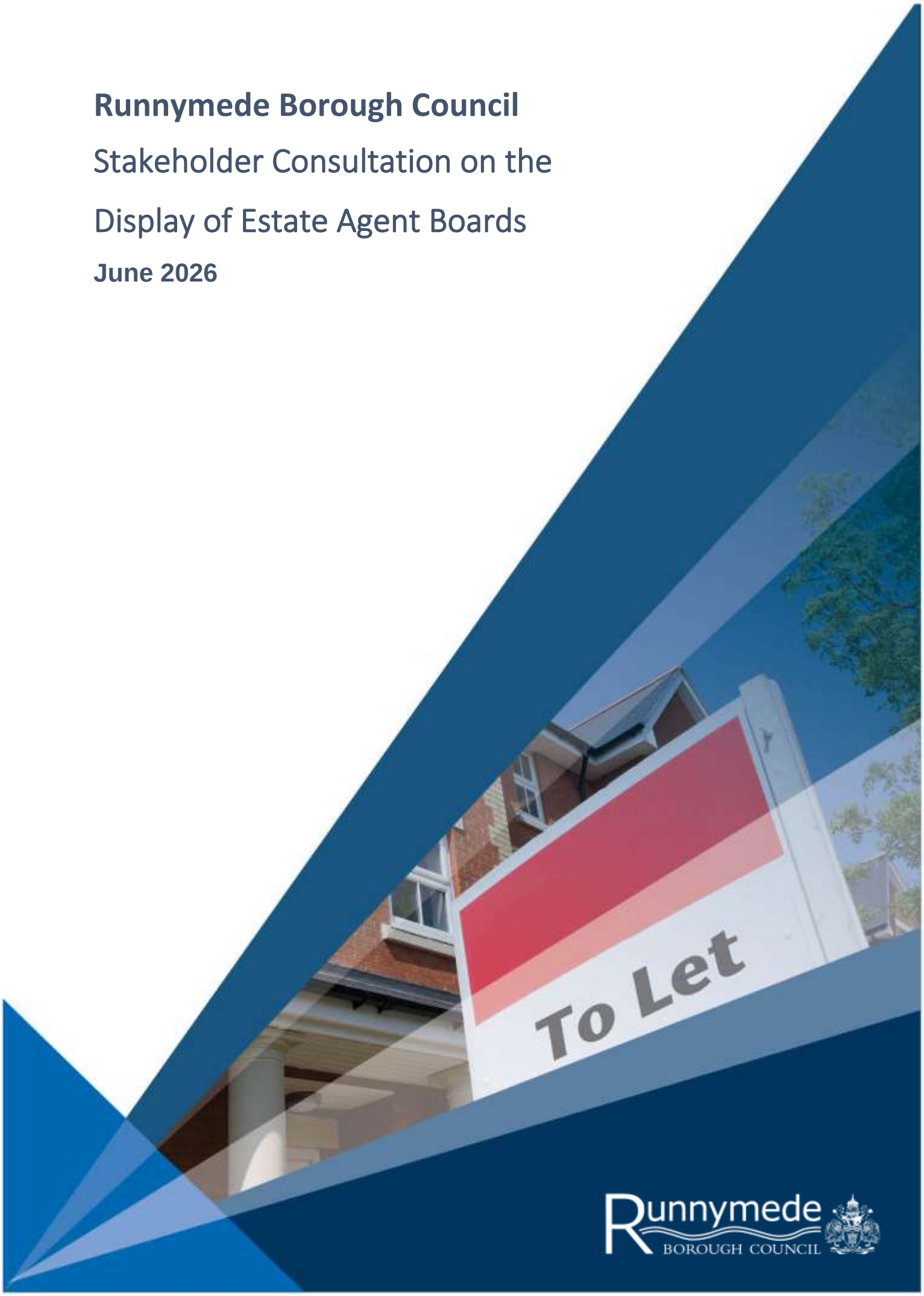
Runnymede Borough Council

Stakeholder Consultation on the Display of Estate Agent Boards

June 2026



Runnymede
BOROUGH COUNCIL

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1. Background

1.1 Schedule 3, Part 1, Class 3 of the Town & Country Planning (Control of Advertisements) Regulations 2007 grants deemed consent for miscellaneous temporary advertisements subject to a number of conditions and limitations. Deemed consent means that consent from the Local Planning Authority is not required as it is granted under the Regulations.

1.2 Class 3A of Schedule 3, Part 1 specifically grants deemed consent for advertisements relating to the sale or letting, for residential, agricultural, industrial or commercial use or for development for such use, of the land or premises on which it is displayed. These usually take the form of 'To Let' or 'For Sale/Sold' estate agent boards.

1.3 The conditions and limitations of deemed consent granted under Class 3A of the 2007 Regulations are:

(1) Not more than one advertisement, consisting of a single board or two joined boards, is permitted; and where more than one advertisement is displayed, the first to be displayed shall be taken to be the one permitted.

(2) No advertisement may be displayed indicating that land or premises have been sold or let, other than by the addition to an existing advertisement of a statement that a sale or letting has been agreed, or that the land or premises have been sold or let, subject to contract.

(3) The advertisement shall be removed within 14 days after the completion of a sale or the grant of a tenancy.

(4) No advertisement may exceed in area—

(a) where the advertisement relates to residential use or development, 0.5 square metre or, in the case of two joined boards, 0.6 square metre in aggregate;

(b) where the advertisement relates to any other use or development, 2 square metres or, in the case of two joined boards, 2.3 square metres in aggregate.

(5) Where the advertisement is displayed on a building, the maximum projection permitted from the face of the building is 1 metre.

(6) Illumination is not permitted.

(7) No character or symbol on the advertisement may be more than 0.75 metre in height, or 0.3 metre in an area of special control.

(8) No part of the advertisement may be higher above ground level than 4.6 metres, or 3.6 metres in an area of special control or, in the case of a sale or letting of part only of a building, the lowest level of that part of the building on which display is reasonably practicable.

1.4 Regulation 7 of the 2007 Regulations sets out that the Secretary of State, upon a proposal made to them by the local planning authority, can also make a direction that deemed consent for a specified area does not apply (a Regulation 7 Direction) and that the consent of the local planning authority is required. The Secretary of State must publicise a local planning authority's proposal and allow an opportunity for representations to be made on the proposal, and take any representations into account, when making a decision.

1.5 Where a proposal relates to a particular area, the Secretary of State must give public notice by publishing details of the proposed direction in a local newspaper, although in practice, the publicity arrangements are undertaken by the local planning authority on the Secretary of State's behalf.

1.6 Where objections are raised to the proposal, the Secretary of State may decide to offer the local planning authority and objectors the opportunity to be heard by a Planning Inspector.

1.7 When the Secretary of State gives a direction under regulation 7 restricting deemed consent, written reasons must also be issued to the local planning authority and anyone who submitted representations. Details of the direction must be published and those owners / occupiers displaying advertisements which are affected by the direction must be notified.

2. Planning Policy & Guidance

2.1 The National Planning Policy Framework 2024 (NPPF) sets out in paragraph 141 that:

'*The quality and character of places can suffer when advertisements are poorly sited and designed. A separate consent process within the planning system controls the display of advertisements, which should be operated in a way which is simple, efficient and effective. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts*.'

2.2 The Planning Practice Guidance Note on advertisements (2014) also sets out that if a local planning authority considers it necessary to restrict deemed consent in a particular area, it must apply to the Secretary of State. Upon receipt of a proposal from a local planning authority, the Secretary of State can issue a direction under regulation 7 that requires express consent to be obtained for advertisements that normally benefit from deemed consent (with the exception of Classes 12 and 13 in Schedule 3 to the Regulations).

2.3 To do this, it must be clear that one or more of the deemed consent provisions has had such adverse effects on the amenity or public safety of the area that there is no prospect of an improvement in the quality of advertising in the locality, unless the local planning authority are given the power to control that particular type of advertisement.

2.4 The Runnymede 2030 Local Plan also contains policies to ensure townscape and landscape quality and the protection/enhancement of the historic environment and its setting.

2.5 Policy EE1 of the 2030 Local Plan sets out that:

'*All development proposals will be expected to achieve high quality and inclusive design which responds to the local context including built, natural and historic character of the area…In particular development proposals will be supported where they:*

…ensure no adverse impact on the amenities of occupiers of the development proposed or to neighbouring property or uses…'

2.6 Policy EE4 on listed buildings states that:

'*Considerable weight will be given to the protection of a listed building and its setting. Development of a listed building, or development within the curtilage or within the vicinity of a listed building or structure should preserve and/or enhance its setting…Proposals should not adversely affect the listed building or its setting by virtue*

of design, scale, materials or proximity or impact on views or other relevant aspects of the historic building fabric.'

2.7 Policy EE5 on Conservation Areas states:

'*Development within or affecting the setting of a Conservation Area, including views in or out, should protect, conserve and wherever possible enhance, the special interest, character and appearance of the Conservation Area.*

Proposals for all new development including…advertisements…will be required to

Preserve and where possible enhance the existing historic fabric and features of the Conservation Area that contribute to its special interest, character and appearance;

Respect the existing local context and established character…and be in keeping with the character and appearance of the conservation area;

In the case of new development, make a positive contribution to local character and distinctiveness.'

2.8 Policy EE8 on locally listed and other non-designated heritage assets sets out that:

'*Development will be required to preserve the character and significance of locally and other non-designated heritage assets, their setting and any features of architectural or historic interest*.'

3. Case for a Regulation 7 Direction

3.1 The application for a Regulation 7 Direction applies to Class 3A advertisement boards only and is further specific to residential 'To Let' or lettings boards but not 'For Sale' or 'Sold' boards. The Council has received a number of complaints of residential Class 3A advertisement boards over the past 3 years, the vast majority of which are lettings boards, not 'For Sale' or 'Sold' boards.

3.2 To make a case for the granting of a Regulation 7 Direction, the Council has collated evidence consisting of complaints received by the Council's planning enforcement team over a 3 year period, data on licensed HMOs and accommodation that has a Class N exemption for Council tax (student households) as well as results of a survey of Class 3A advertisement boards in a particular area of the Borough where an issue has been identified.

Defining the Area for a Regulation 7 Direction

3.3 In the following evidence it should be noted that Class N exempted properties may not all be HMO and that not all licensed HMO are necessarily occupied by students. However, the following section highlights a high correlation between the number of planning enforcement complaints against Class 3A advertisement boards, licensed HMO and Class N exempted property to a particular area of the Borough.

<u>History of Planning Enforcement Complaints</u>

3.4 The Planning Enforcement team have received a number of complaints regarding residential Class 3A advertisement boards over the period 2023-2025. The complaints are largely concerned with an over proliferation of boards and that lettings agents fail to remove these boards within the 14 day time limit from sale or agreed letting as required under the conditions and limitations of deemed consent.

3.5 The number of complaints received by the Council over the last 3 years related to this matter are 3 complaints in 2023, 6 in 2024 and 67 in 2025. As can be seen the number of complaints increased dramatically in the 2025 year.

3.6 All complaints in the 2023 and 2024 years resulted in the Planning Enforcement Team finding a breach of deemed consent and 64 of the 67 in 2025 were also breaches of deemed consent. 86% of all complaints received were for residential lettings boards rather than 'for sale' or 'sold' boards and therefore the focus of complaints is on residential 'To Let' boards rather than 'For Sale' boards. The heatmap at Map 3-1 shows the geographic locations where enforcement complaints have been received in the Borough.

3.7 As can be seen from map 3-1, the location of enforcement complaints predominantly arise around the Englefield Green and Egham areas of the Borough and are particularly concentrated around Royal Holloway University of London (RHUL).

Licensed HMO

3.8 The Council also keeps a register of licensed HMO in the Borough. Licensed HMO are those properties with 5 or more persons in 2 or more households. This is different to the definition of HMO given by the Town and Country Planning (Use Classes) Order 1987 (as amended) which defines HMO (Class C4) as use of a dwellinghouse by not more than 6 residents as an HMO. As such, there will be smaller HMO of less than 5 people which will not require an HMO licence and for which planning permission from the local authority is not required and therefore the Council does not hold a record of these properties (although see the section on Class N exempt property below).

3.9 As at 1st April 2026 there are 435 licensed HMO in the Borough of Runnymede. This is shown geographically as a heatmap of HMO licensed property in Map 3-2. As for the enforcement complaint data, the number of licensed HMO are particularly concentrated around the areas of Englefield Green and Egham in close proximity to the RHUL campus. However, a number of HMO can also be seen across the wider Egham area with smaller concentrations in other locations around the Borough.

Class N Exempt Property

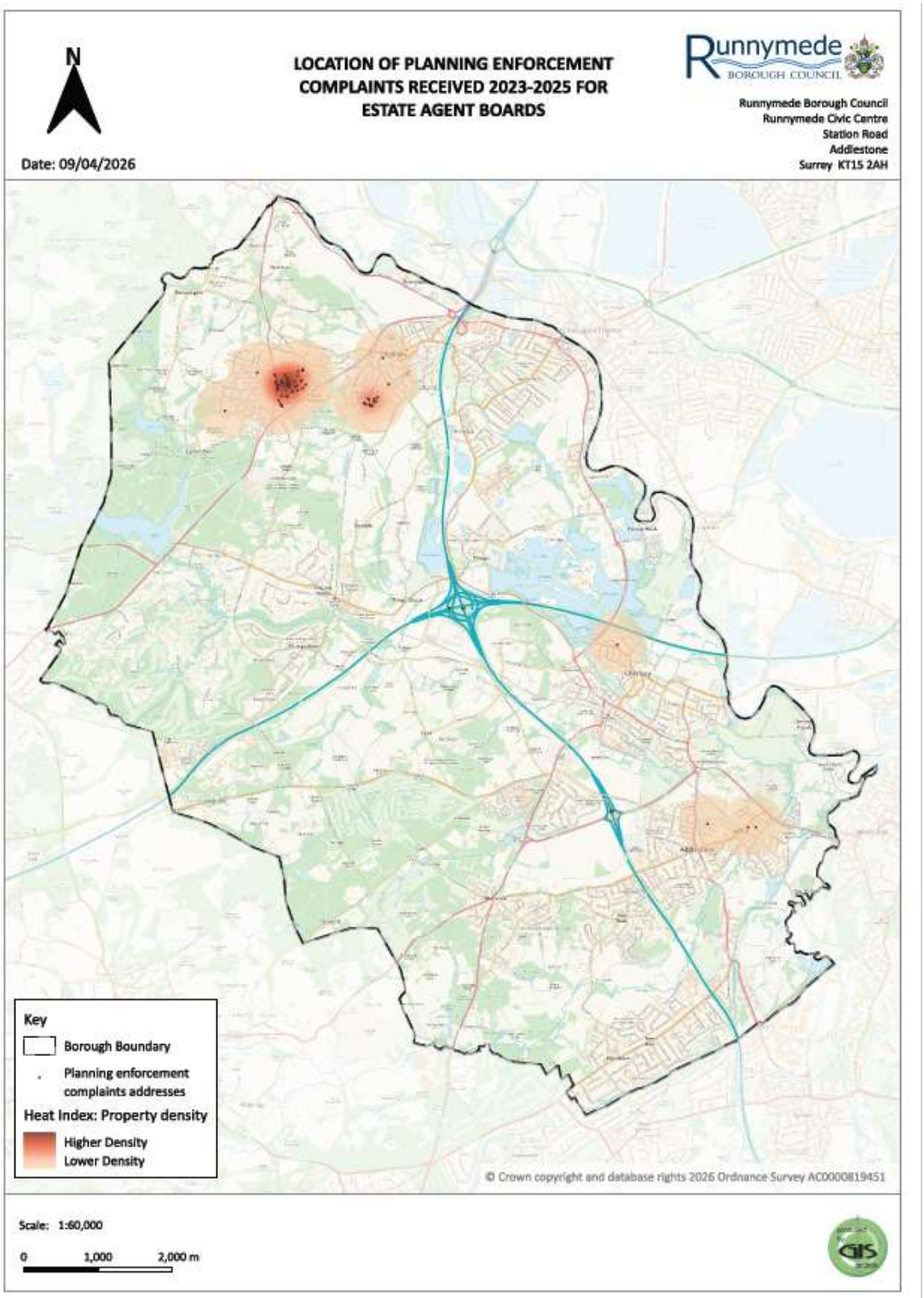
3.10 Class N exempt property are those which have been granted an exemption from the Council Tax charge because they are occupied only by students, the foreign spouses of students, or school and college leavers[1]. There are 957 properties in the Borough which are Class N exempt. This is a higher number of properties than those with an HMO license and therefore it is assumed that a number of Class N exempt properties are likely to be occupied by smaller student households where an HMO license is not required and the use of a property as a smaller HMO does not require planning permission.

3.11 For example, the Council's data for Class N exempt property show some roads in the Ripley Springs area of Egham as having particularly high concentrations of Class N exempt property which are not flatted units but are shown as single address points on the Council's address gazetteer indicating these are likely to be smaller HMO. In some locations such as Nightingale Shott, the concentration of N exempt property is as high as 75% of all property in that street.

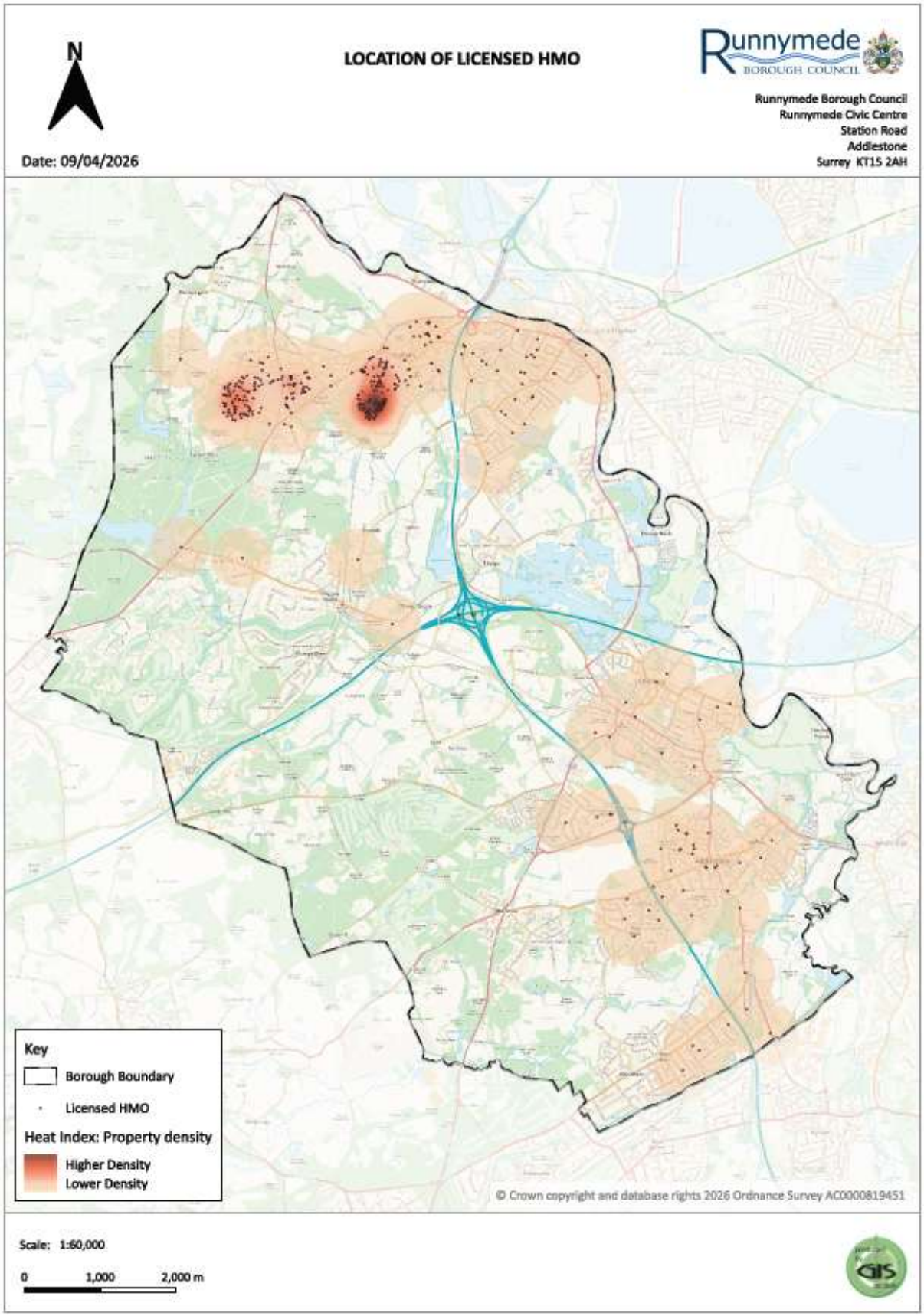
[1] Definition taken from https://assets.publishing.service.gov.uk/media/5a795cafed915d07d35b4dbb/1912013.pdf

3.12 The location of Class N exempt property across the Borough is shown in the heatmap in Map 3-3. As with the data for enforcement complaints and HMO licensed property there is again a particular concentration of properties around the RHUL campus in Englefield Green and Egham which also extends across the wider Egham area, particularly west of the M25.

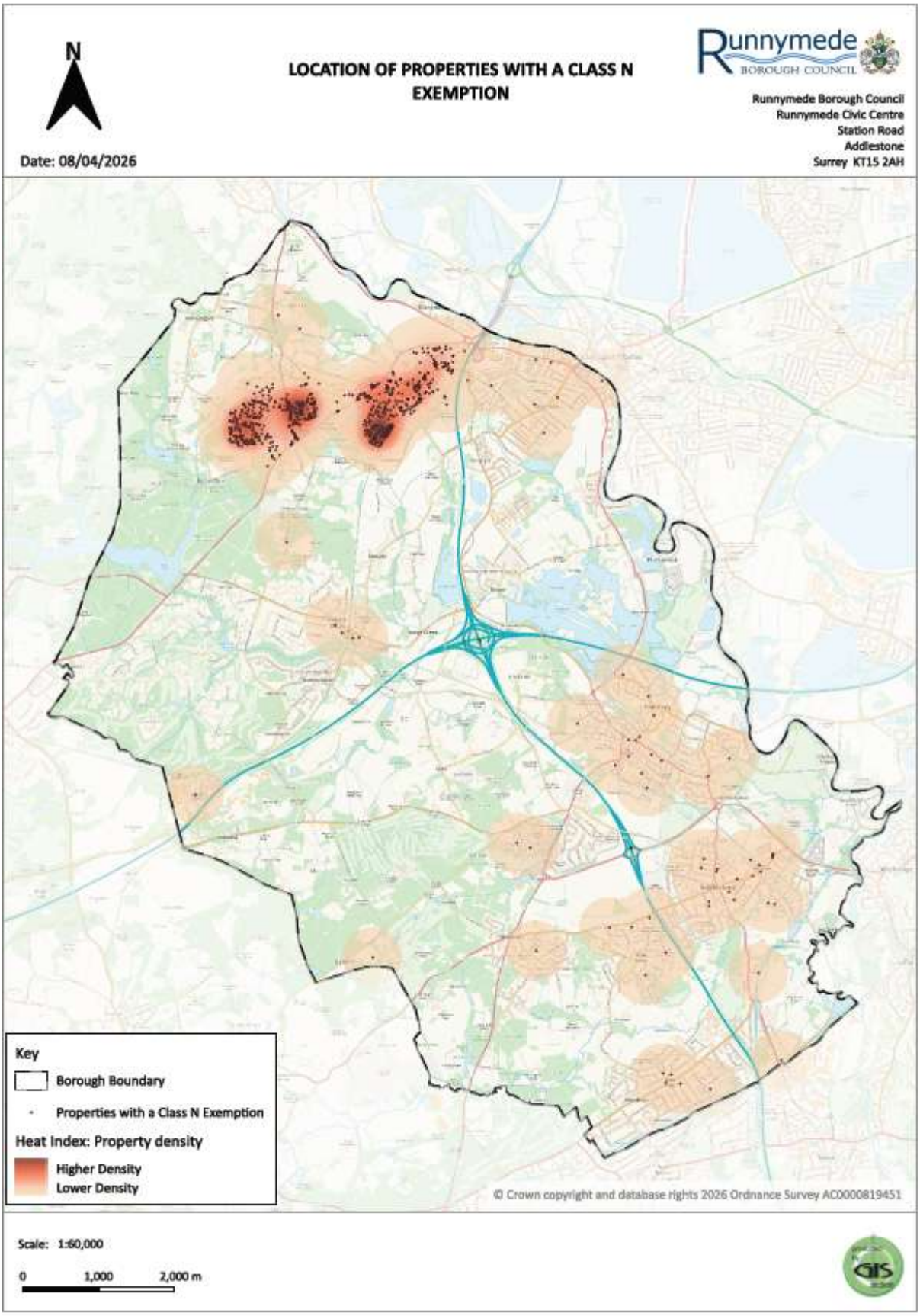
Map 3-1: Heatmap of Class 3A Enforcement Complaints 2023-2025



Map 3-2: Heatmap of HMO Licensed Property as at 01/04/2026

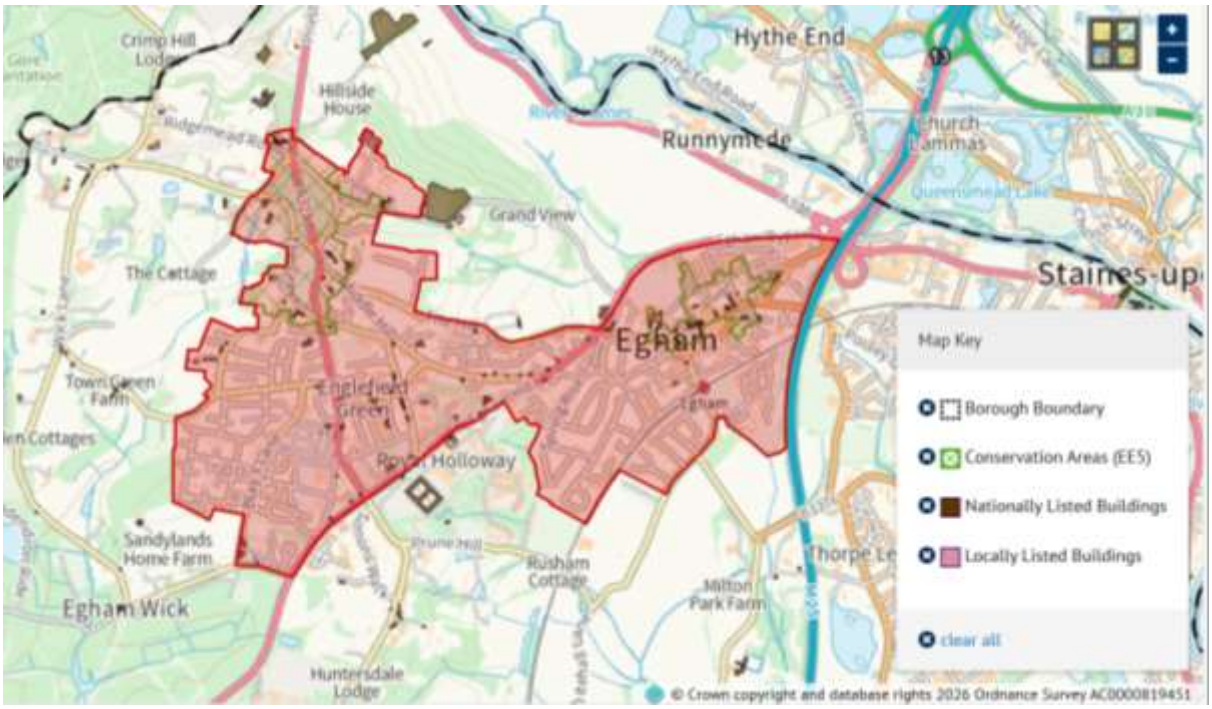


Map 3-3: Heatmap of Class N Exempt Property as at 01/04/2026



3.13 The evidence presented above shows a high correlation between the number of planning enforcement complaints received with respect to residential lettings boards under Class 3A and the number of HMO and Class N exempt property in and around the RHUL campus area of Englefield Green and the wider Egham area west of the M25. Given this high level of correlation, the Council considers that the area which should be subject to a Regulation 7 Direction is as shown in Map 3-4.

Map 3-4: Proposed Area for Regulation 7 Direction



3.14 The area proposed contains the settlement area of Englefield Green west of the A30 (Egham Hill/London Road) as well as the Englefield Green Conservation Area and former Brunel University site which has recently been developed for residential development and which lies within the Green Belt. The area of Egham west of the M25 is also proposed, which includes the Egham Town Centre Conservation area. Within the proposed area there are also a number of nationally and locally listed buildings and structures.

Impact to Amenity

3.15 The PPG note on advertisements (2014) makes it clear that the Council can apply to the Secretary of State for a Regulation 7 Direction where one or more of the deemed consent provisions has had such adverse effects on the amenity or public safety of the area that there is no prospect of an improvement in the quality of advertising in the locality, unless the local planning authority is given the power to control that particular type of advertisement. As such, the Secretary of State can only issue a Regulation 7 Direction based on the impacts to an area on amenity or public safety grounds.

3.16 The Council has not received complaints either from the public or from the County Highways Authority that advertisements under Class 3A within the area proposed in Map 3-4 are having effect on public safety. Therefore, the evidence for the making of a Regulation 7 Direction is based on the impact to amenity.

3.17 As shown in maps 3-2 and 3-3, there are areas of the Borough which have a high concentration of HMO and Class N exempt property and it is assumed these are largely occupied by students attending RHUL. These properties can have a yearly or twice yearly turnover of occupants and the advertisement boards associated with these HMOs and Class N exempt properties cause a proliferation of signage which when viewed on mass, have a cumulative adverse affect on the visual amenity of the areas' character and appearance. The over proliferation of signage is compounded by signs often being left in situ long after the 14 day period for removal under the conditions and limitations of deemed consent and/or where multiple boards are observed at the same property or along consecutive properties.

3.18 As well as the 3 year history of enforcement complaints relating to Class 3A advertisements, the Council undertook a street by street survey of the area proposed for a Regulation 7 Direction (as set out in map 3-4) during February 2026. Table 3-1 sets out the results of the survey and also indicates the percentage of properties in that street which are either licensed HMO and/or Class N exempt. As has been previously stated not all HMO will be Class N exempt property and vice versa, however the numbers do give a good indication of the percentage of properties in a street which has potential for displaying signage under Class 3A, in particular residential 'To Let' boards at the same time.

3.19 The survey results in Table 3-1 only show where advertisements under Class 3A were observed, and not all streets where licensed HMO and Class N exempt properties are located. However, the streets with the highest percentage of HMO and/or Class N exempt property are represented in Table 3-1.

3.20 The survey results show that 128 Class 3A boards were observed within the area proposed for the Regulation 7 designation. As such, the issue of Class 3A boards is still ongoing. In fact, only 4 of the boards for which the Council received planning enforcement complaints over the period 2023-2025 were found in the survey carried out in February 2026, the other 124 were new boards on different properties or those where complaints have not been received.

3.21 The survey also revealed properties where more than 1 board was displayed at the same time or where boards were located at consecutive properties. Examples of these are shown in the photos in Appendix A.

3.22 The above indicates that currently, planning enforcement of Class 3A advertisements is not having the desired effect in ensuring that advertisers implement the conditions/limitations of deemed consent.

3.23 The highest number of boards observed in single streets were 13 at Egham Hill, 7 in Larchwood Drive and Harvest Road, and 6 in Cherrywood Avenue, Elmbank Avenue and Hummer Road respectively. Of the 128 boards observed, 5 were located within the Egham Town Centre Conservation Area (High Street and Hummer Road) and another 3 were located directly opposite the Conservation Area at Strodes View and Walnut Tree House on the High Street. Of the 128 boards surveyed, 26 were located opposite, adjacent or close to either nationally or locally listed buildings and 1 was located within the curtilage of a locally listed building (33 Harvest Road).

3.24 As such, the Council is of the view that the proliferation of advertisement boards under Class 3A, specifically residential 'To Let' boards, evidenced by planning enforcement complaints and through street surveys is, when taken together, having a deleterious effect on the amenity of the area as identified in Map 3-4. The proliferation of boards is adding to general street 'clutter', especially where boards run across consecutive properties and/or where multiple boards are displayed at the same property. This is

having a detrimental impact on the general character and appearance of the area and on the street scene, negatively impacting visual amenity.

3.25 The proximity of some signage boards close to nationally or locally listed buildings and conservation areas is also considered to have a detrimental impact on the setting of designated and non-designated heritage assets within the area shown in Map 3-4.

3.26 The Council considers that the deemed consent provisions, even when their conditions and limitations are enforced, are having such a cumulative adverse effect on the amenity of the local area that the only way to remedy this is for the Council to be given the power to control advertisements through a Regulation 7 Direction made by the Secretary of State, specifically for advertisements under Class 3A and more specifically for residential 'To Let' or lettings boards rather than 'For Sale' or 'Sold' boards.

3.27 Regulation 7 of the Town & Country Planning (Control of Advertisements) Regulations 2007 sets out that in making a Regulation 7 Direction, the Secretary of State can do so for a specified period of time or indefinitely. The Council would request that if minded to make a Regulation 7 Direction for the area shown in Map 3-4, the Secretary of State does so for a period of 5 years, after which the local authority will review the situation and if necessary reapply to the Secretary of State for a further period.

Table 3-1: Survey of streets in area proposed for Regulation 7 Direction

Street Name/Location	Number of Lettings Boards by Street	Number of Residential Properties in Street	No. & (%) of Licensed HMO and/or Class N Property in Street
Albert Road, Englefield Green	1	44	9 (20%)
Alexandra Road, Englefield Green	3	63	10 (16%)
Almond Close, Englefield Green	1	23	4 (17%)
Ashwood Road, Englefield Green	1	39	11 (28%)
Beechtree Avenue, Englefield Green	5	105	26 (25%)
Blay's Lane, Englefield Green	1	38	7 (18%)
Bond Street, Englefield Green	2	108	13 (12%)
Cherrywood Avenue, Englefield Green	6	50	20 (40%)
Clarence Street, Egham	3	84	6 (7%)
Corby Drive, Englefield Green	1	48	8 (17%)
Egham Hill, Egham	13	81*	20 (25%)
Elmbank Avenue, Englefield Green	6	69	16 (23%)
Firbank Place, Englefield Green	1	12	6 (50%)
Greenways, Egham	1	17	11 (65%)
Harvest Road, Englefield Green	7	105*	26 (25%)
Hazel Close, Englefield Green	2	38	7 (18%)
High Street, Egham	7	222*	31 (14%)
Hummer Road, Egham	6	92	15 (16%)
Ilex Close, Englefield Green	1	31	8 (26%)
Kings Lane, Englefield Green	1	42	4 (10%)
Kings Road, Egham	1	17	1 (6%)
Langham Place, Egham	1	29	3 (10%)
Larchwood Drive, Englefield Green	7	156	24 (15%)
Laurel Avenue, Englefield Green	1	47	2 (4%)
Lindon Court, Englefield Green	1	19	9 (47%)
Lynwood Avenue, Englefield Green	5	46	21 (46%)
Magna Road, Englefield Green	1	81	11 (14%)
Middle Hill, Englefield Green	4	160	12 (8%)
Milton Road, Egham	1	36	10 (28%)

Moore Grove Crescent, Egham	1	46	19 (41%)
Nightingale Shott, Egham	4	83	62 (75%)
Nobles Way, Egham	2	39	24 (62%)
North Street, Egham	1	60	7 (12%)
Pine Way, Englefield Green	1	12	4 (33%)
Queens Road, Egham	1	62	5 (8%)
Rusham Road, Egham	3	113	14 (12%)
South Road, Englefield Green	1	31	10 (32%)
Spring Avenue, Egham	1	54	8 (15%)
Spring Rise, Egham	3	112	23 (21%)
St Judes Road, Englefield Green	3	139	56 (40%)
Stoneylands Road, Egham	1	41	8 (20%)
Strode Street, Egham	3	88	9 (10%
The Crescent, Egham	5	92	24 (26%)
Thorncroft, Englefield Green	1	31	2 (6%)
Victoria Street, Englefield Green	5	96	29 (30%)
Willson Road, Englefield Green	1	50	2 (4%)
Total	**128**		

* Excludes Purpose Built Student Accommodation (PBSA).

4. Conclusion

4.1 It is considered that the Council's evidence clearly demonstrates that advertisements under Class 3A of the Town & Country Planning (Control of Advertisements) Regulations 2007, specifically residential 'To Let' boards are adversely affecting a specific area of the Borough of Runnymede. The evidence shows a strong correlation between areas with high densities of licensed HMO and Class N exempt property and where planning enforcement complaints are received for such advertisements. A recent street by street survey of the area carried out in February 2026 confirms this.

4.2 The Council considers that the over proliferation of signs under Class 3A, often appearing along consecutive properties or properties where multiple boards are displayed is having such a deleterious effect upon amenity in terms of visual impact to the character and appearance of the area, street scene and setting of designated and non-designated heritage assets that the only way to remedy this is for the local authority to be given the power to control advertisements under Class 3A for residential 'To Let' or lettings boards.

4.3 The Secretary of State is therefore formally requested to make a Regulation 7 Direction specifically for advertisements under Class 3A for residential 'To Let' or lettings boards for the area as shown in Map 3-4. It is requested that the Regulation 7 Direction should be made for a period of 5 years.

Appendix A - Photographs of Property with more than 1 Board Displayed or Consecutive Boards

Mount Pleasant Cottages, Egham Hill

Egham Hill

Lynwood Avenue, Egham

Harvest Road, Englefield Green

High Street, Egham

King John's Place, Egham Hill

Northdene Court, Egham Hill

St Catherine's Place, Hummer Road, Egham

Strodes View, High Street, Egham

Victoria Street, Englefield Green

Victoria Street, Englefield Green

The Hub, Stoneylands Road, Egham