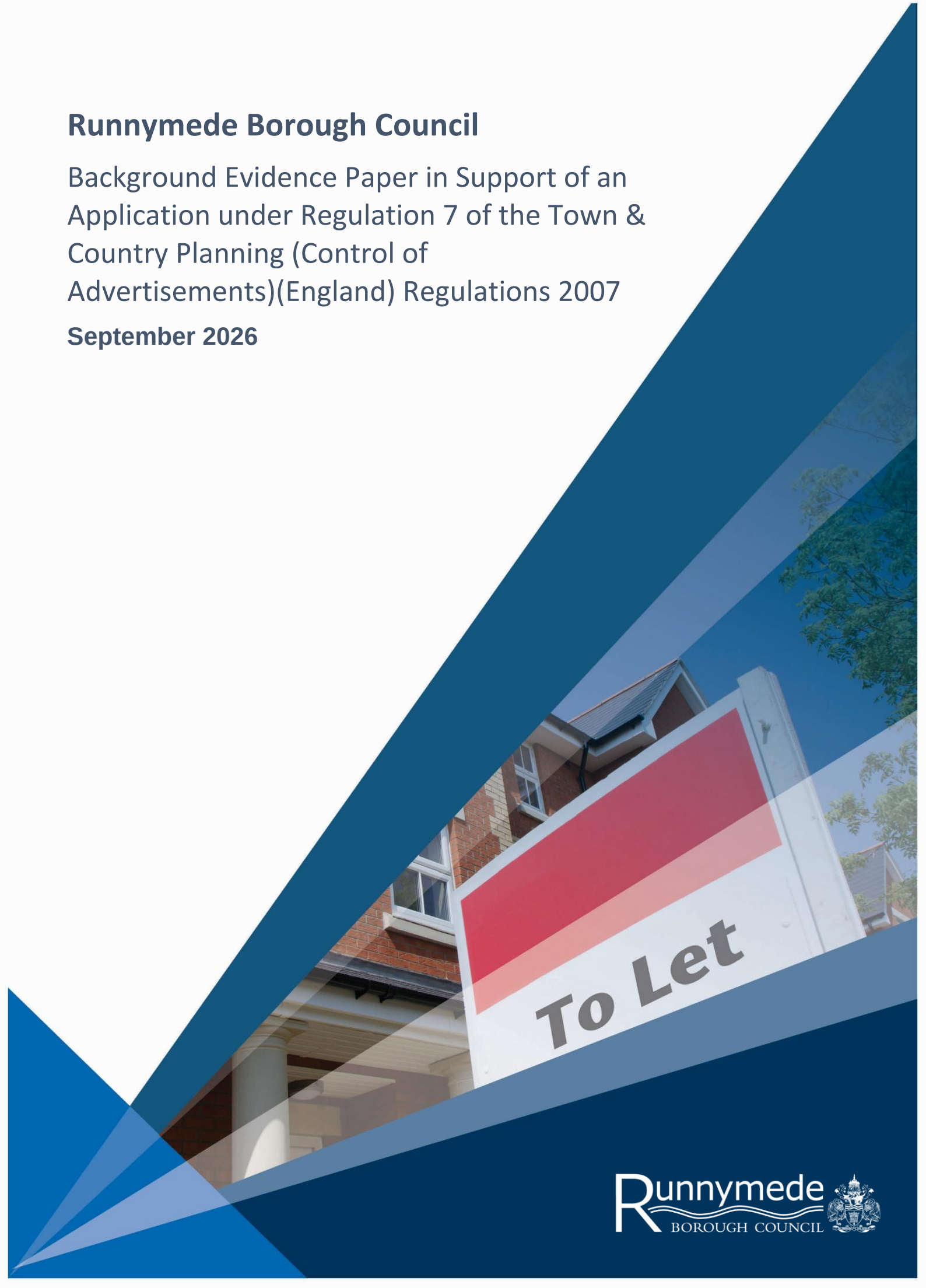
Runnymede Borough Council

Background Evidence Paper in Support of an Application under Regulation 7 of the Town & Country Planning (Control of Advertisements)(England) Regulations 2007

September 2026



Runnymede
BOROUGH COUNCIL

Contents

1. Background 2
2. Planning Policy & Guidance 3
3. Case for a Regulation 7 Direction 4
4. Conclusion 16

Appendix A - Photographs of Property with more than 1 Board Displayed or Consecutive Boards 17

Appendix B - Summary of Representations Received to Early Stakeholder Consultation on an Application for a Regulation 7 Direction 21

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 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).

2.2 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.

2.3 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.

2.4 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…'

2.5 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.'*

2.6 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.'

2.7 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 boards relating to residential lettings not sales. Early stakeholder consultation highlighted concerns from some representors that there can be some variations in the use of terms around 'To Let' or 'Let' and this could result in boards continuing to fall under deemed consent even if a Regulation 7 Direction is made. However, it is not considered that any variations to wording around 'To Let' or 'Let' on advertisements falling under Class 3A would circumvent their control as the wording of Class 3A is for any board relating to lettings (underlining for emphasis), not how this is expressed on the advertisement itself. The Council has received a number of complaints of residential Class 3A advertisement boards over the past 3 years, the vast majority of which relate to 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 (2023-2025) plus the first 8 months of 2026, 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. The Council also undertook an early stakeholder engagement exercise to gauge views of interested parties prior to making an application for a Regulation 7 Direction. The results of the consultation are set out below

Early Stakeholder Consultation

3.3 The Council undertook an early stakeholder consultation exercise from 18 June 2026 to 17 July 2026. The consultation was advertised on the Council's website as well as through leaflets and/or posters displayed at Egham Library, Egham Literary Institute, notice board at Tesco on High Street Egham, The Village Centre in Englefield Green and the notice board at the Co-Op on St Jude's Road, Englefield Green. Emails to those living within the proposed area for a Regulation 7 Direction and who are signed up to the Planning Policy consultation database were also sent an email as well as either emails or letters to local estate agents.

3.4 A total of 28 representations were received, 26 in support of an application to the Secretary of State for the making of a Regulation 7 Direction and 2 objecting. A summary of the representations received and the Council's response is set out in Appendix B of this paper. The main points raised from the 26 representations of support are:

- Issues regarding highway/pedestrian safety;
- Fly-tipping of signs;
- Use of the terms 'To Let' or 'Let' could be re-worded by estate agents to avoid requirement for advertisement consent and keep boards under deemed consent (see response in paragraph 3.1 above to this point)
- If a Regulation 7 Direction is made, how will this be enforced any better than deemed consent?

3.5 The 2 objections raised the following points:

- Anti-business measure generating no additional value to communities;
- Admin and costs for local businesses with limited reward for the Council;
- Council has limited resources
- Occasions when boards are up too long and/or multiple boards on display are few and far between;
- Boards provide a service and are not overly used and temporary.

Defining the Area for a Regulation 7 Direction

3.6 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.

History of Planning Enforcement Complaints

3.7 The Planning Enforcement team have received a number of complaints regarding residential Class 3A advertisement boards over the period 2023-2026. 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.

3.8 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, 67 in 2025 and as at 20th August, 53 in 2026. As can be seen the number of complaints increased dramatically in the 2025 year and this trend is continuing into 2026.

3.9 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. 41 of the complaints up to 20th August 2026 were a breach of deemed consent with 3 still under investigation. 91% of all complaints received were for residential lettings boards rather than 'for sale' or 'sold' boards and therefore the focus of complaints relates to residential lettings boards rather than sales boards. The

heatmap at Map 3-1 shows the geographic locations where enforcement complaints have been received in the Borough (2023-2026).

3.10 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

3.11 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).

3.12 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

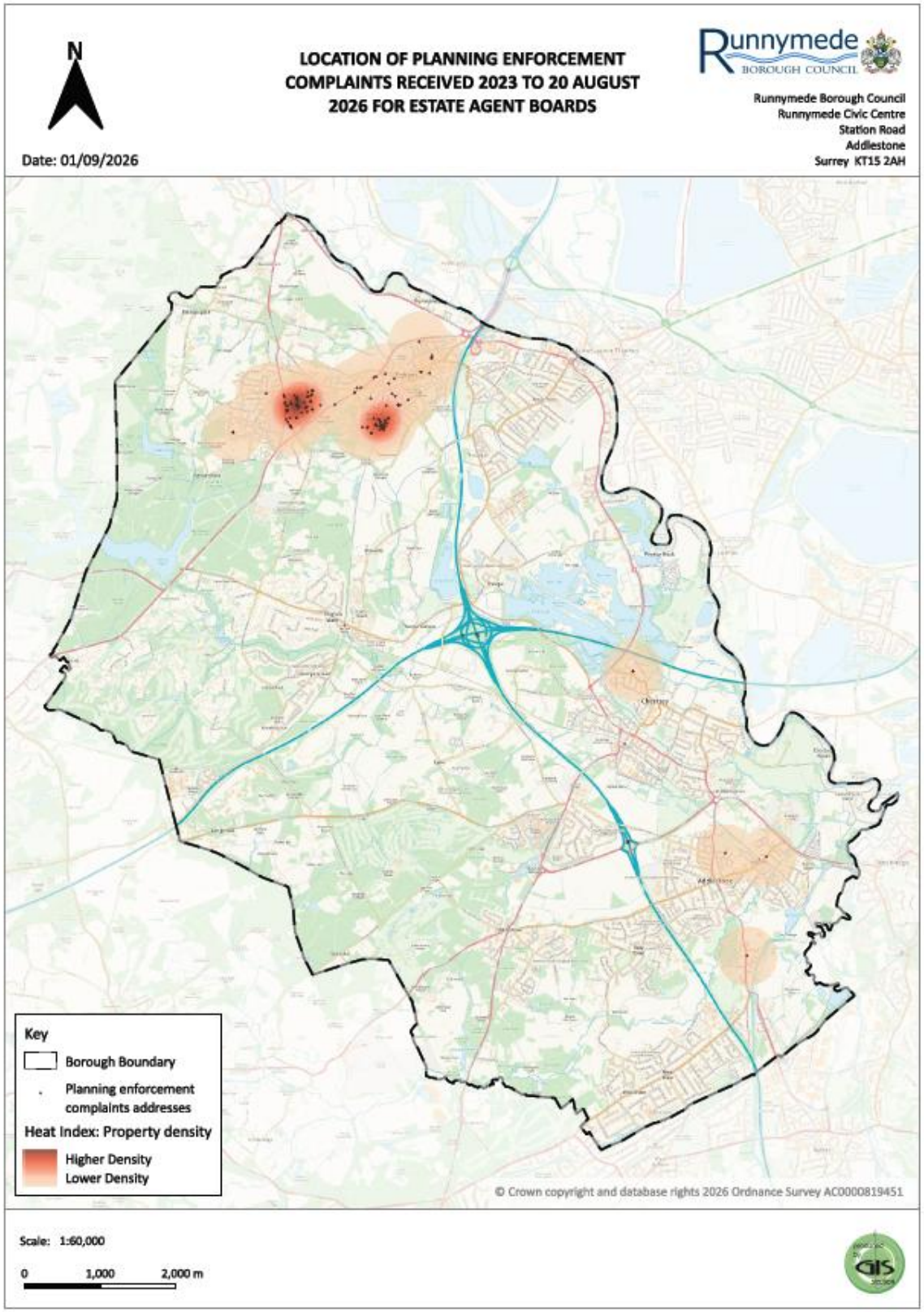
3.13 Class N exempt property are those which have been granted an exemption from the Council Tax charge because they are occupied only by students, the foreign spouses of students, or school and college leavers[1]. There are 957 properties in the Borough which are Class N exempt. This is a higher number 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.

3.14 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.

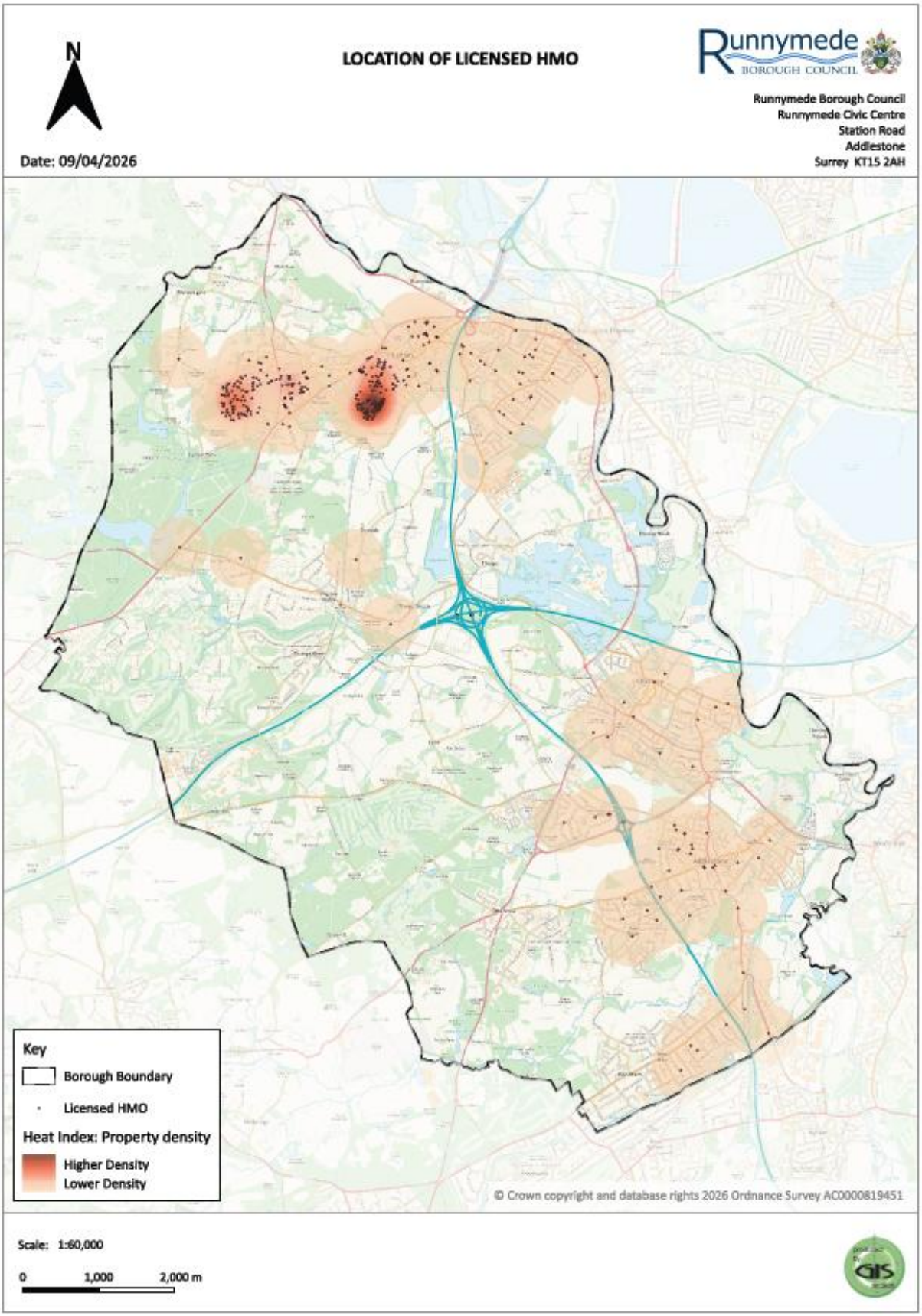
3.15 The location of Class N exempt property across the Borough is shown in the heatmap in Map 3-3. As with the data for enforcement complaints and HMO licensed property there is again a particular concentration of properties around the RHUL campus in Englefield Green and Egham which also extends across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

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

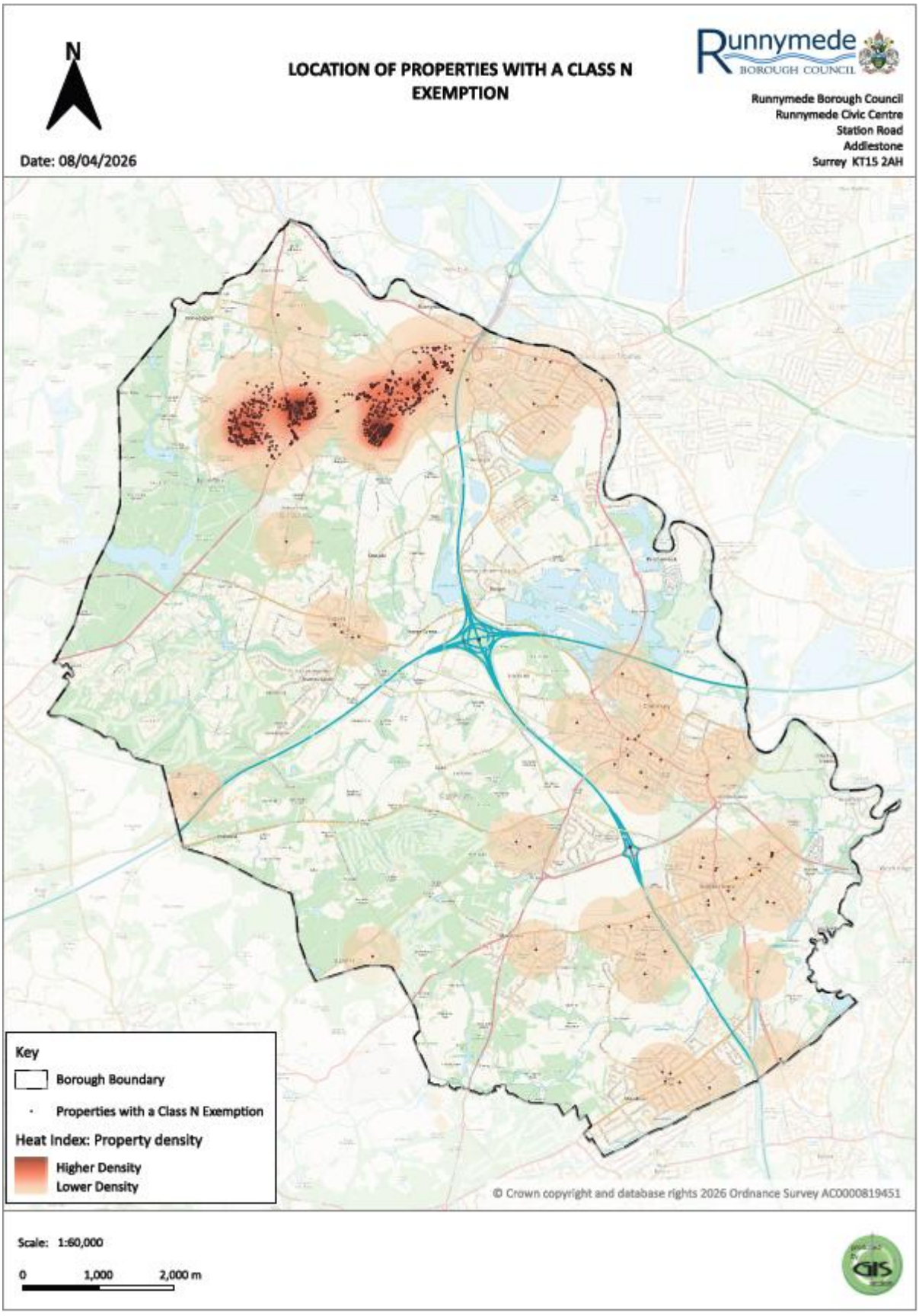
Map 3-1: Heatmap of Class 3A Enforcement Complaints 2023-2026



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

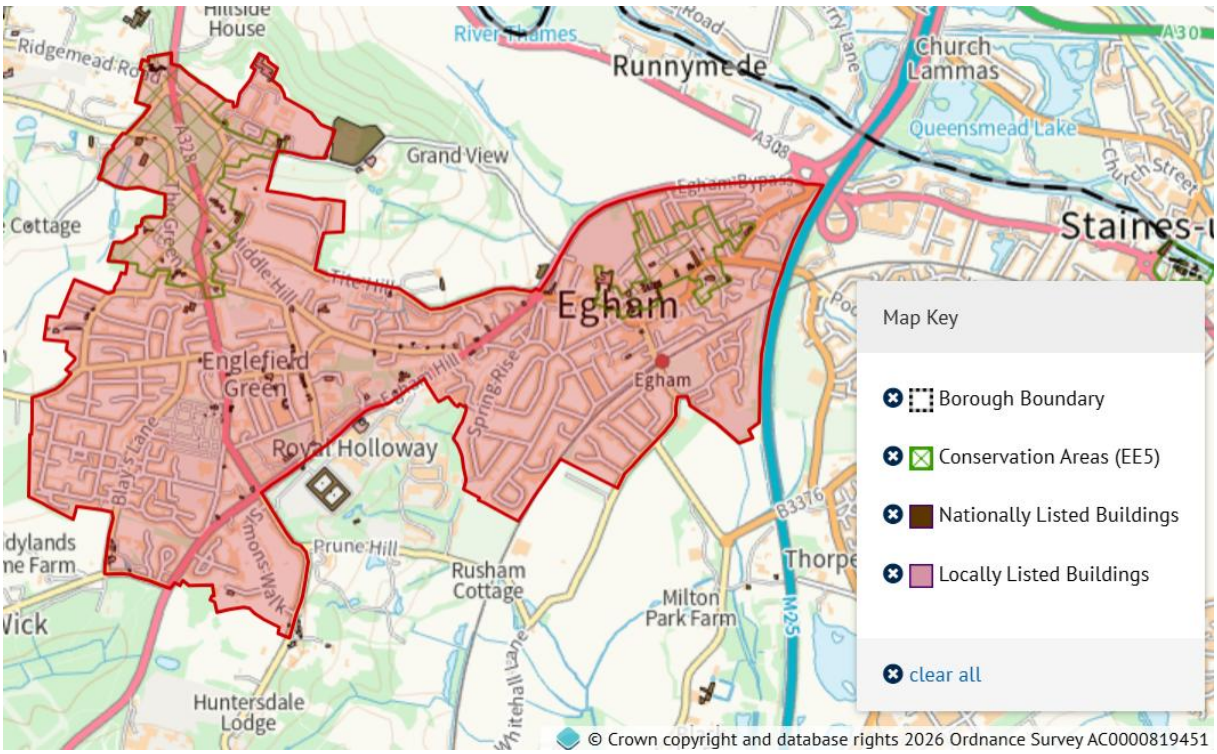


Map 3-3: Heatmap of Class N Exempt Property as at 01/04/2026



3.16 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. The map also shows the location of statutory and locally listed buildings and features and conservation areas.

Map 3-4: Proposed Area for Regulation 7 Direction



3.17 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, former Brunel University site which has recently been developed for residential development and which lies within the Green Belt and the area southwest of RHUL at Simons Walk, Robert's Way, Pinehurst and St David's Drive. 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 & Public Safety

3.18 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.

3.19 The Council has not received complaints to the planning enforcement team 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. However, early stakeholder consultation revealed that signs can obstruct or overhang the public highway and be left lying on the ground posing a risk to public safety.

3.20 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.

3.21 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.

3.22 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.

3.23 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.

3.24 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.

3.25 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.

3.26 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).

3.27 As such, the Council is of the view that the proliferation of advertisement boards under Class 3A, specifically relating to residential lettings, 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. Early stakeholder consultation also revealed that signs can be 'fly-tipped' or left lying on the ground both within and outside of the property advertised. All of these aspects are having a detrimental impact on the general character and appearance of the area and on the street scene, negatively impacting visual amenity.

3.28 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.

3.29 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.

3.30 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).

Enforcement

3.31 The Council's approach to enforcing advertisements with deemed consent under Class 3A has largely focused on achieving compliance through engagement and negotiation. Whilst a Regulation 7 Direction would represent a significant shift in the current framework by removing deemed consent for the display of advertisement boards relating to residential lettings, this will require a more responsive enforcement approach where breaches occur.

3.32 In response, the Council will be reviewing its procedures and Enforcement Charter to ensure that breaches are addressed appropriately, including the potential for earlier escalation where necessary, to provide an effective deterrent and better protect the area's visual amenity. The Council are mindful that any revised approach must be proportionate, consistent, and legally robust, while also responding to residents' concerns about repeated non-compliance.

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 relating to residential lettings 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 and/or where signs are fly-tipped of left lying on the ground 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 relating to residential lettings. This is also the case for public safety aspects such as signs overhanging or obstructing the public highway or other public spaces.

4.3 The Secretary of State is therefore formally requested to make a Regulation 7 Direction specifically for advertisements under Class 3A relating to residential 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



Appendix B - Summary of Representations Received to Early Stakeholder Consultation on an Application for a Regulation 7 Direction

Rep Number	Representation	RBC Comments
Rep 001	Support principle of removing deemed consent for the placing of estate agent lettings boards. Many of these boards are for student lets. Boards are an eyesore and a deterrent to families who view our villages as student ghettos. The estate agents are lazy and in many cases keep the boards up all year round.	Support noted.
Rep 002	Do not support this at all. This is another anti-business measure which generates no additional value to our communities and hinders people from advertising that their property is for sale. Yes, there are occasions when boards stay up for far too long and or where multiple boards are on display, but they are few and far between.	Objection noted, however, the Regulation 7 application would be for 'lettings boards' not 'For Sale' boards.
Rep 003	Support the principle of removing deemed consent for the placing of Estate Agents Lettings Boards. Houses situated in Roads surrounding the Royal Holloway College, accessing the Rear Entrance (via Lynwood Avenue/Spring Rise) to Royal Holloway, including but not only Spring Rise, Spring Avenue, Lynwood Avenue, Ripley Avenue, are on many occasions covered in Estate Agent Letting Signs, which are a complete eyesore, and out of character to those who reside in the area.	Support noted.
Rep 004	Support proposed Application for a Regulation 7 Direction for the Control of Estate Agent Boards. Irritated by the number of "To Let" boards in our road and nearby streets. Problem is mostly that the 14 day period is ignored. Signs often taken down and left lying on the ground, either just inside the property fence or often leaning against the fence on the pavement. This is unsightly and makes signs dangerous litter, especially as they sometimes have naked	Support noted. Issue regarding highway safety to be added to background evidence.

	screw ends sticking out of them. They also often obstruct the pavement.	
Rep 005	Support proposal to remove deemed planning consent from estate agents' lettings boards. These boards have spread like the plague and add up to a significant eyesore.	Support noted.
Rep 006	Support the principle of removing deemed consent for the placing of estate agents sales and letting advertising boards. Have emailed estate agents in Englefield Green numerous occasions regarding boards being abandoned and causing obstacles on pavements and public areas. Also had to email as boards have remained on display long after the 2 week period after the property has been let or sold.	Support noted. Issue regarding highway safety to be added to background evidence.
Rep 007	Support plans to restrict estate agents using boards to advertise in the Egham and Englefield Green area. To let and for sale signs are left up far too long after a properties status has changed and is either sold or let. They are a visual blight and change the feel of the places which are residential and not commercial.	Support noted.
Rep 008	Support the proposal. Include Simons Walk and Roberts Way in the designated area. In the Draft Evidence Paper, Armstrong Rd is missing, please can the data for it be included. Just encompassing 'letting boards" might have a displacement type of effect whereby agents simply achieve the same thing they're doing now by utilising other types of boards, possibly	Support noted. The Council has not received any enforcement complaints regarding Simons Walk or Roberts Way but there are a few licensed HMO in the area so these roads will be added. In the draft evidence paper Table 3-1 is highlighting the roads/streets where estate agent boards were observed during the on-street survey of Feb 2026. Armstrong Road is not included as no signs were observed during the survey period for that road. Other classes of advertising board can also benefit from deemed consent and Schedule 3 of the Control of Advertisement Regulations 2007 sets these out along

	modified. It's just brand and services advertising and target market is people who walk, cycle and drive in the area, so putting up or leaving up boards not covered by the Direction will be a temptation. For enforcement, RBC are reliant on self-regulation by the agents (this has not worked so why should it with a Direction?) and then residents who want to improve village aesthetics. Please sharpen up the council's enforcement policy with some timescales and teeth for breach.	with their conditions and limitations. A modified form of an estate agent board is not considered to fall under any other Class in Schedule 3 and therefore deemed consent would not exist and advertisement consent from the local authority required and/or enforced. The Council has primarily secured compliance through engagement and negotiation, which has proven effective in most cases. Should a Regulation 7 Direction be introduced, the Council would consider its implications carefully, recognising that the removal of deemed consent for 'To Let' and 'Let By' boards would represent a significant change and require a more responsive enforcement approach. In response, the Council would review its procedures and Enforcement Charter to ensure breaches are addressed appropriately, including earlier escalation where necessary to deter non-compliance and protect visual amenity. Any revised approach would remain proportionate, consistent, and legally robust, while being applied fairly and transparently to ensure no advantage is gained by those who fail to comply.
Rep 009	Some type of control on the use of estate agent boards in this area would be great. High density of student HMOs means that it is awash with boards for most of the year, year after year. These boards are an absolute eyesore; both those that are up and those that are recumbent. Recumbent boards can remain in front gardens of HMOs indefinitely. Worse still, is that some of these boards will then travel around the community.	Support noted.

	Only concern is how you are going to enforce it if passed? Knowing that many estate agents appear to game the system, fear is they may get creative and change the terminology of these boards from the traditional, 'Let' to the more abstract: 'Taken' or 'Spoken For'. Will your policy wording cover this possible loophole? Could your policy not cover all types of boards, both those For Sale and To Rent?	The Council has primarily secured compliance through engagement and negotiation, which has proven effective in most cases. Should a Regulation 7 Direction be introduced, the Council would consider its implications carefully, recognising that the removal of deemed consent for 'To Let' and 'Let By' boards would represent a significant change and require a more responsive enforcement approach. In response, the Council would review its procedures and Enforcement Charter to ensure breaches are addressed appropriately, including earlier escalation where necessary to deter non-compliance and protect visual amenity. Any revised approach would remain proportionate, consistent, and legally robust, while being applied fairly and transparently to ensure no advantage is gained by those who fail to comply. The Regulation 7 Direction, if it comes into force will remove deemed consent for advertisements under Class 3A of Schedule 3 of the Control of Advertisement Regulations 2007. Class 3A is 'An advertisement 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.' As such, it should not matter if estate agents change wording on boards, the advertisement will still be relating to a letting for which deemed consent will have been removed. This can be made clearer in the evidence paper.
Rep 010	In agreement with this application as boards are left for advertising in general rather than on a specific property that is available. There is sufficient evidence to make an application to the Secretary of State for a Regulation 7 Direction to remove deemed consent for Estate Agent boards in this area and the	Support noted.

	Council should have control over whether they can be displayed following a formal application process.	
Rep 011	Agree that these boards should be controlled. They remain in place throughout the year when the properties have obviously been let. They are detrimental to the appearance of the area and serve no purpose other than advertisements for the agents. There was no need for them now that the properties are all advertised on the internet.	Support noted.
Rep 012	Agree that proliferation of rental estate agent boards need control in designated areas.	Support noted.
Rep 013	Strongly disagree. Boards allow people to know what is on offer, they provide a service. They are not overly used in my opinion. The only "busy" places are those with multiple HMOs as students change at the end of the academic year, so it is very temporary. However, the students themselves are far more problematic than the signs. Limiting HMOs would solve the root cause. Councils have limited resources. This seems like admin and cost for locally run businesses and the council with very little reward. The return on investment is very limited indeed. Please can the council spend time and money on child and vulnerable adult care, potholes, schools etc rather than on creating an administrative burden for very little return.	Objection noted. It is not considered that the implementation of a Regulation 7 Direction would add significantly to administrative burdens. The services noted here are currently provided by Surrey County Council not Runnymede. From 1st April 2027, these services will fall under the new East or West Surrey Unitary Authorities who will make decisions on funding priorities for services including the former Runnymede area (as it will be from 1st April 2027).
Rep 014	Concern about the sheer number of estate and letting agents' "To Let" and "Let" signs displayed throughout the village. Proliferation of signs has become a significant visual blot on the character and appearance of Englefield Green. In addition to creating street clutter, they remain in place long after properties have been let, give a misleading impression of high	Support noted.

	residential turnover, and detract from the village environment and the appearance of individual properties. Would ask the Council to consider whether such signs could be prohibited, particularly in areas where their concentration is excessive. If a ban is not legally or practically possible, I would urge the Council to introduce and enforce clear limits on how long signs may remain on display and to require their prompt removal once a property has been let.	The Council cannot prohibit such signs but can control their display where a Regulation 7 Direction is in place. Signs erected under deemed consent or with the consent of the Council will be subject to conditions and limitations including the length of time signs can be displayed.
Rep 015	Support removal of deemed consent rights for estate agent boards in affected areas. Current rules allow boards without planning permission, leading to local issues. High numbers of HMOs result in excessive, visually intrusive signage. Negative impact on street appearance and community character. Issue is particularly severe in Egham: • High concentration of student HMOs linked to Royal Holloway; • Streets near the university dominated by boards during peak letting periods; • Creates cluttered, transient appearance; • Undermines sense of place and balanced communities. Boards are often left up beyond permitted time limits. • Weakens existing controls; • Increases enforcement burden. Removing automatic rights would: • Not prevent advertising; • Require planning permission for each board; • Provide a proportionate response to cumulative harm. Other councils have already implemented similar measures. Proposal would reduce visual clutter, improve street appearance, and protect local amenity.	Support noted.

Rep 016	Support for the principle of removing deemed consent for the placing of estate agent boards.	Support noted.
Rep 017	Strongly support the introduction of Regulation 7 direction re lettings boards in the proposed areas of Englefield Green and Egham. Their proliferation has been detrimental to the visual aesthetic of the area. They are also not removed within the timeframe they are supposed to be. They are often seen lying on the ground where they have fallen or removed. Many seem to stay up all year round. Some also present health and safety risk. In my street, one was jutting over the pedestrian footpath presenting risk to pedestrians, especially those who are visually impaired. These lettings boards are a blight on the community and the operators should face stricter regulation and control.	Support noted. Issue regarding highway safety to be added to background evidence.
Rep 018	Support for this proposal. Often see these boards left for weeks, when we purchased our home we ended up calling the estate agents multiple times for the sign to be removed and taken away. They also leave the signs up for longer than is necessary to falsely promote the home though it's not available. They put multiple signs up for the same home which looks unsightly and suggests there is more than one home available.	Support noted.
Rep 019	Support for the principle of removing deemed consent for the placing of estate agent lettings boards. No objections to my neighbours in and around Bakeham Lane/Simons Walk selling their family homes (to other families), but it is the unsightly and depressing appearance of 'To HMO Let' let signs, seemingly permanently erected or strewn in gardens/on pavements in Englefield Green which ruin our pleasant village atmosphere.	Support noted. Issue regarding highway safety to be added to background evidence.
Rep 020	Wholly support principle but there are shortcomings in the scope, ambiguity and conclusion of consultation document. **Fly-tipping**	Support noted.

	Consultation document focuses on the impact to visual amenity of boards being in place but does not mention the rubbish or fly tipping aspect. Document mentions protracted time signs are left up but does not acknowledge that after such extended periods signs can end up as waste, littering both private and public spaces rather than being collected by the agent. Signs simply left to fall down, taken down by tenant or local resident and discarded. Consequently, proposal should be for all estate agent boards not just lettings boards. Other Councils have done this such as Hammersmith & Fulham who carry out regular inspections of areas covered by a Regulation 7 Direction.	Background evidence paper to be updated to include issue of fly-tipping of signs. Evidence of enforcement complaints shows that only a limited number of complaints received concerning 'Sales' boards as opposed to majority for 'lettings' boards.
	Type of Sign In document's conclusion, request is for control of 'To Let' and 'Lettings' boards. However, this does not clearly and unambiguously define which boards the Council is seeking to control. Council has assumed estate agent signs relating to the sale of residential property bear the words 'For Sale' or 'Sold' and signs relating to letting of residential property bear the words 'To Let' or 'Let' which is not true. Estate agents use signs with other wording such as 'Let & Managed', 'Managed By', 'Spoken For', 'Taken', 'Available' and 'I'm Taken'. If all estate agent signs not banned than they could easily switch from using signs with 'For Sale', 'Sold', 'To Let' and 'Let' on them to words such as 'Available' and 'I'm Taken'. In such cases estate agents could argue these signs have not had deemed consent removed.	The Regulation 7 Direction, if it comes into force will remove deemed consent for advertisements under Class 3A of Schedule 3 of the Control of Advertisement Regulations 2007. Class 3A is 'An advertisement 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.' As such, it should not matter if estate agents change wording on boards, the advertisement will still be relating to a letting for which deemed consent will have been removed. This can be made clearer in the evidence paper.
	In any case the Council's enforcement department could find itself having to investigate all reports of signs marked 'Available' and 'I'm Taken' to ensure they are being used for the property which is for sale/sold and not a property that is to let/let. This problem would be avoided by ensuring the scope of the Regulation 7 Direction applies to all estate agent signs on	See comment above.

	residential property. If the Council is not willing to seek to remove the deemed consent for all signs relating to residential property (as other Council's have) it could modify the Regulation 7 Direction by requesting the power to control all advertising relating to residential property under Class 3A except where the sign is specifically marked 'For Sale' or 'Sold'. **Planning Permission** Although Regulation 7 Direction would remove deemed consent to erect some types of Class 3A signs this would not prevent estate agents applying for planning permission to erect such signs which may be attractive if the permission was to apply to a portfolio of properties intended for letting to students over the long term – which many are as they are bought as investment properties. The consultation does not include the conditions against which such application would be assessed or the conditions that might apply to such planning permission. Such criteria should be should be explicitly documented to enable the Planning Committee to debate them and make an informed decision next time the issue is brought before it. **Enforcement** No policy, regulation or legislation will solve any particular problem unless it is effectively enforced. Whilst removal of deemed consent is welcomed the ultimate objective of improving visual amenity will not be achieved unless the new regulations are effectively enforced. Consultation document cites the high number of lettings boards in the area and points out they are often in situ after the 14 day period for which deemed consent exists, the document fails to point out the vast majority of those breaches are committed by a relatively small number of estate agents – probably just six – and there is a high level of persistent repeat offending.	If an advertisement consent were granted which covered multiple properties/locations, each location would need to be shown on a site location plan for that consent. Any conditions attached to a consent for multiple signs would apply equally to each sign consented. An application for a Regulation 7 Direction is not concerned with the conditions or restrictions placed on an advertisement consent, rather it is simply an application for consent to be required by the authority not deemed. Conditions on consents granted by the authority, if a Regulation 7 Direction came into force, is a matter for each individual application based on its merits. The Council's approach has largely focused on achieving compliance through engagement and negotiation, which has been successful in the vast majority of cases. Should a Regulation 7 Direction come into force, the Council will carefully consider its implications. Such a Direction would represent a significant shift in the current framework by removing deemed consent for the display of 'To Let' and 'Let By' boards. This would require a more responsive enforcement approach where breaches occur. In response, the Council would review its procedures and Enforcement Charter to ensure that breaches are

	Displaying advertising signs including estate agent 'Let' boards without the necessary permission is an offence under the Town & Country Planning (Control of Advertisements)(England) Regulations 2007 and RBC already has the power to prosecute offenders but doesn't. It follows a practice which results in no deterrent to, or consequences for, offenders – even those with a record of high repeat offending. Other Council's such as Spelthorne do prosecute offenders. Appears then that RBC's current enforcement policies and practices are perpetuating the specific issue of 'Let' signs being left up after the 14 day deemed consent period has expired by sending a message – even to a small group of persistent repeat offenders – that there will be no consequences. There is a real risk that any new Regulations on advertising signs will be treated the same and will not achieve the desired result. In addition to introducing a Regulation 7 Direction to remove deemed consent for other types of estate agent boards, RBC needs to simultaneously introduce amended enforcement policies and practices to ensure the underlying objective of improving the visual amenity of our communities is achieved.	addressed appropriately, including the potential for earlier escalation where necessary, to provide an effective deterrent and better protect the area's visual amenity. Officers are mindful that any revised approach must be proportionate, consistent, and legally robust, while also responding to residents' concerns about repeated non-compliance. The intention is to apply the regulations fairly and transparently, ensuring no advantage is gained by those who fail to comply.
Rep 021	Signs are present in every street of the Village and they stay there for a very long time. They make really bad the appearance of the area. Englefield Green is a really pretty Village which has lots of potential as a very good place to live since it is surrounded by parks and green areas.The boards take away the beauty of the houses and cottages and make the roads very messy. Nowadays we use Internet for everything therefore people look at the websites to search for houses to buy or rent.	Support noted.

	There isn't any need to put up any of the Estate Agency boards. They should be completely banned from any street, everywhere.	A Regulation 7 Direction would not ban estate agent signs but require the application for their display to be considered by the Council rather than being granted deemed consent.
Rep 022	Support the removal of deemed consent for estate agents lettings boards. I live in the Englefield Green Central area and, due to the high concentration of student lettings, these boards are always there and are an eyesore that have an adverse effect on the appearance of the area. Students go directly to websites and apps rather than walk the streets looking for somewhere to rent, so the only purpose these boards appear to serve is to advertise the estate agency to landlords.	Support noted.
Rep 023	Support for the principle of removing deemed consent for the placing of estate agent lettings boards. We have several HMOs across the road from our family home. Several of the boards have been up long enough (years!) to become faded by the sun. Others are left up for at least half a year. It is horrible, the houses are left in disarray/are not maintained, and parking is almost impossible until the students vacate the HMOs for the summer. You can, at the very least, make this situation that the council has allowed via HMOs become less of an eye-sore to those of us who live in the community permanently.	Support noted.
Rep 024	Support for the principle of removing deemed consent for the placing of estate agent lettings boards. Unfortunately, some end up in bushes, trees, or just left on the driveways and gardens until the students move out, when they are just disguarded on the roads, paths or by the bins. Surely whoever puts these signs up, has a record of where and when, so these could be taken down, taken away and reused. Good for the environment too.	Support noted. Issue of fly-tipping and highway safety of signs to be included in background evidence.

Rep 025	Support for the principle of removing deemed consent for the placing of estate agent lettings boards. I have lived in Englefield Green for a number of years, the proliferation of HMO is causing this problem due to perpetual turn over of tenants and the advertising of property as a result. The free advertising due to failure to remove the boards in a timely fashion is unacceptable. Some houses in my road would have multiple signs permanently displayed. Better regulation of estate agents letting boards would significantly improve the appearance of the area.	Support noted.
Rep 026	Fully support the idea of the council being able to remove estate agents lettings boards without consent. I am a resident of Englefield Green and it is a big problem , from a safety point of view and aesthetically. Many boards are left lying down for a long time, many are never taken down, just multiple boards added , they obstruct the view at junctions and make the high street very unsightly. Not long ago I counted 13 on St Jude's Road.	Support noted. Issue of highway safety to be added to the background evidence.
Rep 027	Support to the proposal for a regulation 7 direction application to be noted. As a resident of Hummer Road there have been multiple estate agents using the street as a free advertising platform for years. In particular two houses (HMOs) have each had Aspen "Let" (not "to let") signs up for multiple years continuously despite having been let & being fully occupied by students. The boards are a eyesore & detract from the attractive Victorian & Edwardian features that many of the properties have. The wording in the consultation concerns me though in that it refers continuously only to "to let" boards, surely it should also include "let" as well to fully close the issue as these as a pair are the alternative to "For Sale" & "Sold"?	Support noted. The Regulation 7 Direction, if it comes into force will remove deemed consent for advertisements under Class 3A of Schedule 3 of the Control of Advertisement Regulations 2007. Class 3A is 'An advertisement 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.' As such, it should not matter if estate agents change wording on boards, the advertisement will still be relating to a letting for which deemed consent will have been removed. This can be made clearer in the evidence paper.
Rep 028	Support for the principle of removing deemed consent for the placing of estate agent lettings boards. In addition, I believe landlords rather than tenants should be held responsible for the upkeep of the road-facing estate on their property, including the wheely bin siting. The village has become blighted in recent years and would no longer be my choice of a place to move to.	Support noted.