

Planning Strategy  
Blackpool BC  
Century House  
PO Box 17  
Corporation Street  
Blackpool FY1 1LZ

4 February 2019

Dear Sir/Madam,

**Blackpool BC – Local Plan Part 2 – Informal Consultation – January 2019**

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

The BSGA represents 65% of the sales of signage throughout the UK and monitors development plans throughout the country to ensure the emerging Local Plan Policies do not inappropriately apply more onerous considerations on advertisements than already apply within the NPPF, Planning Practice Guidance (PPG) and the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (as amended).

The BSGA consider that, in some instances, the text and policies in the draft Local Plan do not reflect either the law or Government policies, as outlined below:

**Policy DM22 1(d)** - it is agreed that signage should be in proportion to the shopfront. But there is no justification for the requirement that it be “only at fascia level”. There are many circumstances where signs at other than “at fascia level” may be wholly acceptable, e.g. hanging signs which are commonly placed above fascia level, menu boxes at restaurants etc. We suggest that “only at fascia level and” be deleted.

**Paragraph 3.248** - there may well be good reason for blanking some shop windows with “vinyl or other advertisements”. There may be tills nearby or internal access requirements. Furthermore, enclosed shop window displays are a very traditional form of display (consider jewellers’ shops) which retailers may well wish to retain. We suggest that shop window displays are not the Council’s business, particularly since there is nothing the Council can do about whatever form of display is selected. Any advertisement inside a building is either excepted from control or has deemed consent under the Regulations; and this includes any form of advertisement fixed directly to the inside of glazing. You might say that you consider it “good practice”. But, in the end, it is a retailer’s choice, as it absolutely should be.

**Policy DM24 (2)** – this is unduly restrictive. The Regulations require that all advertisement proposals must be considered on individual merit with regard only to amenity and public safety. It is not open to a local authority to restrict the display of a certain general type of advertisement through policy. Further, there is absolutely no justification for such a blanket ban. Modern internally illuminated signs are commonly

in slimline boxes (they do not need the depth of older boxes because modern LEDs do not produce the heat which neon strips do). Their face panels may be fret-cut or overlaid so that visible illumination is limited to lettering/logos only; they may be of the “halo” illumination type; and they may be wholly appropriate when seen in conjunction with modern-design shopfronts. We cannot see any justification whatsoever for their total exclusion from principal and secondary shopping areas and the Promenade. These are just the type of areas where such signs would be wholly appropriate and acceptable. We suggest that Policy DM24(2) be deleted and replaced with:

“2. Older-type, bulky internally illuminated box signs, often crudely bolted-on to existing fascias, will not be permitted. More modern types of internally illuminated box signs must be used with discretion, particularly on listed or locally listed buildings and in conservation areas.”

**Policy DM24(4)** - as explained above, the Council cannot control this type of display. All advertisements inside buildings are either excepted from control or may be displayed with deemed consent. So, the Council cannot normally permit or not permit this simply because no permission is required! This paragraph should be deleted.

**Policy DM24(5)** - we do not understand why “digital” signage should be picked out for particular consideration. The Regulations and Government policy and practice advice do not differentiate between digital and other forms of advertising. It is still the case that each proposal must be considered on individual merit. This proposed policy is again unduly restrictive and almost Luddite. Digital advertising is the future (as far as we can see today). It uses less energy, produces fewer waste products, is versatile, requires less servicing (i.e. fewer vehicle miles) and is an attractive product. We can see no justification whatsoever for the proposed restrictions on this modern form of advertising. We suggest that this paragraph should be entirely deleted.

**Paragraph 3.267 first bullet point** – as explained above, internally illuminated box signs are not necessarily “poor design”. We suggest that “crudely attached, bulky” be inserted between “such as” and “internally illuminated”

**Paragraph 3.267 bullet point 4** – there is no reason why a “high level” advertisement should be judged for acceptability upon whether it relates to the part of the building on which it is displayed. This is not a relevant consideration. The impact of such a sign on amenity and public safety are the only relevant considerations. “unrelated to the use of that floor of the building” should be deleted.

**Paragraph 3.267 bullet point 7** – again as explained above, views into the building are not a decisive consideration (although they may be a factor if a building is specifically designed for the interior to be seen from the outside – though this is rare). And there may be other very good reasons why the view to the interior is required to be obscured. Since the Council cannot control this matter anyway, this bullet point should be deleted.

Generally, we consider that the Council's policies (and promised SPD) could be far more positive rather than being almost of list of "don'ts". The advertising industry has just as much interest in promoting business and prosperity and therefore has an inbuilt interest in encouraging good practice in designing and producing all types of signs to suit their buildings and localities. We would be glad to engage with the Council on the drafting of their policies and guidance to ensure that these promote the best practice without stifling choice and innovation.

It is hoped that these comments are found to be useful and informative. If you have any further questions, please contact me.

Yours faithfully,

**Chris Thomas**