

Local Plans Team  
Planning, Regeneration and Environmental Services  
Doncaster Council  
Civic Offices  
Waterdale  
Doncaster DN1 3BU

18 September 2018

Dear Sir/Madam,

**Doncaster Council - Local Plan – Informal Consultation - September 2018**

These representations are submitted on behalf of the British Sign and Graphics Association (BSGA) in response to the consultation on the above draft Local Plan document. In particular, we are concerned with Policy 50.

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 National Planning Policy Framework, Planning Practice Guidance and the Town and Country Planning (Control of Advertisements)(England) Regulations 2007.

We consider that Policy 50 is generally sound with the exception of 50(G).

Policy 50(G) requires that all advertisements should be located in commercial areas or predominantly commercial mixed-use areas; or, if elsewhere, “must clearly enhance” the area.

This section of the Policy is ridiculous. The definition of “advertisement”, in section 336(1) of the Town and Country Planning Act 1990 (as amended) is extremely wide. It would include most commercial signs; but also house names and numbers, bus stop signs, traffic signs, for sale and to let boards, building contractor’s signboards, advertisements inside any premises’ windows etc etc. Please look at DCLG’s explanatory booklet “Outdoor advertisement and signs: a guide for advertisers. To confine advertisements to commercial areas is just not possible.

Secondly, there is no legal requirement for any advertisement to “enhance” an area – even in conservation areas, the statutory test is to “preserve or enhance”. The

requirement for “enhancement” is therefore beyond the powers in the Planning Acts or Regulations.

Overall, section(G) of Policy 50 is unlawful and unenforceable. It adds nothing and we suggest it simply be deleted.

Yours faithfully

**Chris Thomas**  
**for British Sign & Graphics Association**