

Planning Policy  
East Staffordshire Borough Council  
PO Box 8045  
Burton on Trent  
Staffs DE14 9JG

19 July 2019

Dear Sir/Madam,

**East Staffordshire Borough Council – Shopfronts Design Guide SPD –  
Draft June 2019**

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

The BSGA represents 65% of the sales of signage throughout the UK and monitors development plans throughout the country to ensure that emerging Local Plan Policies and Supplementary Guidance 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).

We offer these comments to correct some inaccuracies in this draft SPD; to assist in making the SPD both up-to-date and informative; and to seek to persuade you that some of the advice proposed is either contrary to the law, national policy and guidance or simply impractical. We are sure that you will recognise that SPD advice which is impractical is less than useless – it will simply be ignored.

Firstly, we suggest that, in **paragraph 2.4**, a reference might be made to MCHLG's (previously DCLG) very comprehensive booklet "Outdoor advertisements and signs: a guide for advertisers" which is a free publication and of which your Council should hold a stock. This reference may also be usefully added to **Further Information** at the end of the SPD.

In **paragraphs 3.1, 5.8, 5.13, 5.23**, the advice suggests that internally illuminated "box" fascia signs will always be bulky and crude and therefore unacceptable. We understand the intentions of these paragraphs. These older types of bulky signs are no longer widely used (modern LEDs are smaller and do not produce the heat of neon strips and the box does not therefore need the thickness to accommodate the bulk of the strip lights and fittings and to allow the heat to dissipate without creating a fire hazard). But we think that this advice would be better expressed along the lines of:

"Bulky projecting box-like fascia signs crudely attached over existing fascia boards will not be acceptable."

The advice might also accept that suitably designed and positioned internally illuminated box signs are commonly seen above modern shopfronts (where a "traditional" hand-painted wooden sign would look totally out of place). Modern signs are slimline, often recessed into the fascia or contained within the projection of pilasters/console brackets. There should be no presumption against such signs on some mistaken "principle". Commonly now, internally illuminated box signs are constructed with fret-cut panels or built-up letters, such that the light is seen only through the letters and logos. In this respect, they actually spread less light than externally illuminated signs where the light invariably illuminates beyond the advertisement itself. We suggest that the general advice on illumination might be something like:

"Illumination of shopfront signs should be appropriate to the design and style the shopfront and take account of the surroundings. External illumination may be through trough lighting or spotlights. These should be appropriately sized and directed to avoid light spillage. Bulky, fully internally illuminated box signs crudely attached over existing fascia's will not be acceptable. Other forms of internal illumination (e.g. halo or through individual built-up or fret-cut letters) may well be suitable on more modern shopfronts and in commercial areas."

Further, as with box fascia signs, modern technology means that projecting signs (Illuminated or not) are now often slimline. They can be wholly appropriate on a modern fascia and shopfront where an older-style hanging sign would look totally out of character. We suggest that **paragraph 5.23** might reflect this fact:

"Bulky projecting box signs will not be acceptable. Contemporary projecting signs should be restricted to modern shopfronts and buildings and used with discretion. They should integrate with the other features of the shopfront. Where illuminated, the method of illumination should be chosen to reflect the character and context of the shopfront and/or building. On older-style shopfronts, a hanging sign (usually on either a plain or ornate bracket) may well be more appropriate. These may be illuminated by discreet trough striplight or spotlight."

The advice on levels of illumination, in **paragraphs 5.22, 5.23 and 5.24**, is so vague as to be of no practical use. What is "low"? Full advice on appropriate levels of illumination is in the Institute of Lighting Professionals Professional Lighting Guide PLG 05 "The Brightness of Illuminated Advertisements". Whilst this is a long and fairly complex document, your SPD might perhaps extract and use the figures in Table 4 in section 8 of this document as guidance. As to the colours of the light, this will depend on the nature of the advertisement to be illuminated and the intended effect. We see no reason to exclude "colours" – after all, internally illuminated advertisements will show the colour of the face of the advertisement, not the lights inside! So all colours will still be seen.

In **paragraphs 5.11, 5.22 and Section 7 Checklist**, there appears to be an idea within the Council that they have some sort of right or responsibility to decide whether illumination is "necessary" or "justified" in principle. This is not so. It is the Council's responsibility to consider any application on individual merit. This will

include an assessment of the impact of any illumination proposed upon local amenity or public safety. Illumination cannot be refused simply because the Council consider it "unnecessary" in principle. Nor does an applicant have to "justify" an application for an illuminated sign. All reference to "need" or "justification" in these paragraphs are contrary to the law and national planning practice (PPG ID 18b-026-20140306) and should be deleted.

In **paragraph 5.11**, we suggest that the SPD should recognise that sign design is a matter for personal choice. "Hand written or individually applied letters" may be the most appropriate in some cases, particularly on more traditionally-styled shopfronts. But they may not be "the most appropriate" on wholly modern shopfronts. We suggest that the first sentence of this paragraph might be re-drafted as:

"Handwritten or individually applied letters may be most appropriate on more traditionally-styled shopfront fascia's. The scale of the letters should be proportionate to the width and depth of the fascia."

**Paragraphs 5.14, 5.15 and Section 7 Checklist.** There may well be good reason for the obscuring of glazing (security/internal layout) and this is a matter for the business' choice. All advertisements within buildings are either excepted from control or have deemed consent under the Regulations (including posters/vinyls etc attached to the inside of glass). So these are not controllable by the Council anyway. We suggest that these paragraphs be expressed rather as "advertisers would wish to be aware that....."; and use "may" instead of "not" or "avoid".

In **paragraphs 5.15, 5.17 and 5.20**, the SPD should recognise that colour of itself is again a matter of personal choice and is not generally controllable by the Council. In particular, the advice in **paragraph 5.20** is ridiculously prescriptive and vague. How can you relate a colour to "age and heritage and the prevailing character of the area"? Primary colours are the basis for all the colours of the universe – they have been around since "the big bang". How can you possibly seek to advise that their use should be avoided? Again, the choice of colour is a personal choice and not to be dictated by the Council. Can you imagine a High Street with no red, yellow or blue? Take your own town centre (Burton). In just a short stretch of the pedestrianised Station Street, there are signs in red, yellow, blue and virtually every secondary colour (orange, green etc). Does this make the street unacceptable? No – on the contrary, it gives it character and makes it interesting and attractive for shoppers. We suggest that all advice on colour in the SPD be deleted and replaced simply with "garish" colours should be avoided.

Again in **paragraph 5.20**, the advice that "high gloss" finishes should be avoided is unduly prescriptive. Look again at Station Street. There are many signs with a "high gloss" finish. But does this spoil the street? We suggest that this bullet point might be re-drafted as:

"Care should be taken with materials. Glossy modern materials (such as some plastics and aluminium with a gloss finish) may not be appropriate on older-style shopfronts and buildings where matt/eggshell finishes are likely to

be more appropriate. But gloss materials may well be acceptable on modern shopfronts, provided they relate to, and integrate with, the other elements of the shopfront and building.”

Similar considerations apply to the advice on canopies and blinds in **paragraph 5.17**. Traditional flat canopies which contain advertising will generally have deemed consent under Class 5 in Schedule 3 to the Regulations. Their colour, design or content may not generally be controlled by the Council. And what, anyway, is wrong with “striped” blinds? They are not uncommon and certainly cannot be regarded as “non-traditional”. Blinds also often contained advertising matter (not least on the frill at the leading edge), simply because when extended, they virtually cover the fascia sign as the SPD recognises. But the Regulations do not permit the Council to control the content of signs unless in the interests of amenity and public safety in each specific case – see Regulation 3(4). The content of a sign is, as it should be, at the businesses’ discretion. We suggest that all reference to colour and content of advertising in this paragraph be deleted.

In **paragraph 5.15**, why should neon signs be avoided? If carefully designed and positioned, they add an extra dimension. We suggest that this prescription be deleted.

**Paragraph 5.16**. This paragraph should make clear that it refers only to the public footway, i.e. part of the highway. It cannot apply to private forecourt areas, even though they may appear to be part of the footway. Indeed, forecourt signs (including “A” boards and other fixed or movable signage) is granted deemed consent (subject to limitations) in Class 6 in Schedule 3 to the Regulations.

We are aware that the SPD is for guidance on best practice. But we think that the more permissive the guidance, the more likely it is that it will be used (not least because the more widely-used types of signs are necessarily cheaper). Small, incremental improvements must be more welcome than absolute disregard for a document which does not reflect reality.

Yours faithfully

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