

Local Development Plan Team
Falkirk Council
Abbotsford House
David's Loan
Falkirk FK2 7YZ

1 October 2018

Dear Sir/Madam,

Falkirk Local Development Plan 2 – Consultation - September 2018

These representations are submitted on behalf of the British Sign and Graphics Association (BSGA) in respect of the consultation on the above draft 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 Town and Country Planning (Control of Advertisements) (Scotland) Regulations 1984 and SDD Circular 10/1984.

We have some concerns with Policy PE03 “Advertisements”. We consider that the preamble to the policy and PE03(1) and (2) are adequate for the proper control of signage throughout the Council’s administrative area. The first part of Policy PE03(3) is also acceptable. However, the further restriction that illuminated advertisements “will generally be prohibited outwith the Urban Limit” is beyond the powers granted by the Regulations, overly restrictive and impractical. Firstly, the Regulations require powers to be exercised in the interests of amenity and public safety only. This does not permit the designation of certain types of signs or area to be “generally prohibited”. Each proposal must be considered on individual merit and without preconceived conceptions of what may be “prohibited”. Second, the advice is unduly restrictive and impractical. Has it occurred to the Council to consider businesses outwith the Urban Limit who trade in darkness (including winter mornings and afternoons)? What about restaurants, public houses, petrol filling stations and all manner of shops including convenience stores? How do you expect these to trade in darkness without any indication that they exist and are open for trade? This part of the Policy is unnecessary. The first part of (3) states that illumination will be controlled in the interests of amenity and public safety. This is enough. If a particular illuminated sign is detrimental to its surroundings **within or outwith** the Urban Limit, then it will not accord with the first part of the Policy. The second half of Policy PE03(3) should be deleted.

Policy PE03(4) is negative and unrealistic. One would expect a sign which is “in the public interest” to be provided as an official traffic sign on the highway. But who is to judge what is “in the public interest”? This is not a criterion permitted for consideration by the Regulations. Many businesses which rely on passing trade are remote from main roads yet need to advertise their presence and services in order to survive. We suggest that this section should accept the need for these signs in appropriate circumstances; but advise only that such signs should respect the character of their surroundings (particularly where they are in the countryside) and be designed and located so as not to be detrimental to public safety.

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
for British Sign & Graphics Association