



Dear Sir/Madam,

Halton Delivery and Allocations Local Plan – Submission Draft – July 2019

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.

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 would first thank you for including us in your consultation process and for accepting our representations on the earlier consultation draft of this document.

We are now generally content with Policy HC4 "Shop Fronts, Signage and Advertising", albeit that "Signage and Advertising" are the same thing. The Regulations and statutory guidance inevitably just refers to all as "Advertisements". We suggest that this word should replace "Signage and Advertising" simply for clarity and consistency. Similarly "signage and" could be removed where it appears in Policy HC4 and the supporting text (paragraphs 11.18 and 11.20 – compare with 11.19 where all are described as “adverts”).

The only concern we have is with paragraph 11.22. We have examined this SPD. It dates from 2005 and is wholly out of date. We cannot see that such an out-of-date document would be regarded as “a material consideration”. Guidance which is over 14 years old is unlikely to be considered current or up-to-date (NPPF paragraphs 15 and 33). We suggest that this SPD is long overdue for revision and suggest that Paragraph 11.22 of the draft might be amended to:

“The Council will update its existing Shop Fronts, Signage and Advertising Supplementary Planning Document SPD (2005) which sets out When updated, the SPD will be

Yours faithfully,

Chris Thomas
for British Sign and Graphics Association