

Planning Policy
Mansfield DC
Civic Centre
Chesterfield Road South
Mansfield
Notts NG19 7BH

20th September 2018

Dear Sir/Madam,

**Mansfield DC – Local Plan – Publication Draft,
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.

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.

We are particularly concerned with Policy P8 and its supporting text.

P8(3)(b) - “any illuminated advertisements are required to be fully justified”. This equates to an assessment of “need”. This is not permitted by the Regulations, as confirmed in paragraph ID 18b-026-20140306 of the PPG. This criterion is not within the powers in the Regulations and should be deleted from the Policy.

P8(3)(c) - We accept that, within conservation areas and on historic buildings, any development (including advertisement displays), must preserve or enhance the area’s historic and architectural appearance and character. But many conservation areas (including Mansfield) are thriving commercial centres where the normal range of advertisements on commercial premises is to be expected, provided they do not detract from visual amenity. Whilst we accept that signage needs to be carefully designed, we consider that the guidance should not presume against internally illuminated box signs. If the sign is appropriate to the character of the particular shopfront, building façade as a whole and the street scene, then it should be

permitted. For instance, box signs today are often slimline and recessed into the fascia and do not have the appearance of a thick box crudely added on over an existing fascia panel. There is no reason why such signs cannot be appropriate on suitable shopfronts even within a conservation area or on a listed building, particularly where they are in overwhelmingly commercial areas. For example, even within 100m of Manfield's Town Hall within a conservation area, there are very many existing internally illuminated "box" signs; and these do not automatically detract from the character or appearance of the area. The other criteria suggested in P8(1), (2) and (3)(a) are adequate to ensure the proper control over shop signs within the area. Policy 8(3)(c) should be deleted.

As to the supporting text, additional restrictions are suggested which are not supported with Policy P8 itself. This is reason enough for their deletion. But practical considerations (and legal/soundness issues) also indicate amendments and deletions.

4.56 - There is no justification for the restriction on upper floor signage to that relating to the use of those particular floors. Again, within 100m of the Town Hall are numerous projecting and hanging signs (and others) mounted at first floor level but relating to the ground floor use. Do these all detract from amenity? Of course they don't. And the content which advertisers place on their fascia signs is a matter for them. The addition of street numbers may be helpful; but it cannot be required in law or as a matter of policy. This paragraph should be deleted.

4.60 – This paragraph makes a number of assumptions, none of which are supported by any evidence. Signs which project beyond the fascia would include projecting and hanging signs, window blinds etc. All of these are commonplace even on "historic" shopfronts; indeed, many of these are an integral part of the attractive character and charm of the premises. This restriction is ridiculous and should be deleted.

As above, there is no evidence or justification for the restriction on internally illuminated signs. If they can be suitably integrated into the character and appearance of the shopfront (which would be covered by Policy 8(1)(a) and (3)(a)), they should be considered acceptable. This is an unnecessary restriction which is already covered by other criteria in Policy P8 itself. It should be deleted.

Similar considerations apply to other external forms of illumination. As to illumination by swan-neck or projecting spotlights, we accept that rows of swan-neck lamps can be unsightly on many buildings and are certainly not, as many think, a traditional means of illumination. But external illumination by spotlights or lights concealed in troughs is not automatically unacceptable, provided the light-spread is carefully directed and the lighting units concealed or "painted-in". We do not consider that this means of illumination should be automatically prohibited. Have you considered the needs of proprietors in shops and other businesses which need to trade at night (or even early morning and late afternoon in the winter months)? Concern for the well-being of traditional high street shopping areas is well-placed. Restrictions such as you propose only exacerbate the strangling of the needs of high street businesses to trade successfully in competition against "out-of-town"

We consider that paragraph 4.60 would add unnecessary criteria which would only add to the economic difficulties of high street traders, contrary to the advice in section 6 of the NPPF, particularly paragraph 80 (“Building a strong, competitive economy”). We suggest that paragraph 4.60 be deleted entirely.

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