

Planning Policy
Development & Regulatory Services
Oxford City Council
St Aldate's Chambers
109-113 St Aldates
Oxford OX1 1DS

06 February 2019

Dear Sir/Madam,

Oxford Local Plan 2036 – Proposed Submission Draft, November 2018

These representations are submitted on behalf of the British Sign and Graphics Association in response to Policy DH6 (Shopfronts and Signage) and supporting text of 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, PPG and the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (as amended).

In Policy DH6 and in paragraphs 6.4.2 and 6.4.3, there are references to some signs requiring “planning permission”. This is incorrect in law. Some advertisements require express consent under the Control of Advertisements Regulations; but none require a grant of planning permission. All signs which are lawfully displayed with consent under the Regulations are granted deemed planning permission by section 222 of the Town and Country Planning Act 1990 (as confirmed in paragraph ID 18b-004-20140306 of the PPG). We therefore suggest that the words “planning permission” in each place be deleted and replaced with “advertisement consent” or “express consent”.

Whilst we are content that Policy DH6 itself properly reflects the law and the advice in national planning policy and practice guidance, we are concerned that the final sentence of paragraph 6.43 exceeds the powers of the Council. The suggestion that internally illuminated box fascia and projecting signs “will not generally be appropriate in conservation areas” appears to pre-judge applications for signs of this type. Whilst we accept that “standard” or “corporate” signs may need to be modified to suit their context, this does not mean that internally illuminated signs will, even “generally” be unacceptable in conservation areas. All internally illuminated signs must be “box” signs (to contain the lighting elements). But this does not make them unacceptable just because they happen to be on premises in conservation areas.

Many conservation areas are also thriving commercial centres where the full range of advertisements is to be expected on commercial premises. Internally illuminated fascia and projecting signs (which may be slimline or recessed into the fascia and

may comprise fret-cut or individually applied letters) may be wholly acceptable on modern shopfronts where they reflect the age and character of that shopfront. Indeed, in such circumstances, they will usually appear more apt than older-style wooden or painted signage. We therefore suggest that the final sentence of paragraph 6.43 should end at "...requirements of the policy.". The remainder of the sentence should be deleted.

Yours faithfully,

Chris Thomas
for British Sign & Graphics Association