

Planning Policy and Delivery  
Tamworth Borough Council  
Marmion House  
Lichfield Street  
Tamworth  
Staffs B79 7BZ

29 January 2019

Dear Sir/Madam,

**Design SPD - Consultation Draft, January 2019**

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

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 and Supplementary Guidance 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.

The BSGA generally welcomes the draft SPD. We consider that, for the most part, its advice is sensible and reasonable.

We would offer a few comments which, we think, might avoid confusion in the text; and allow for the flexibility demanded by the Control of Advertisements Regulations, i.e. that all advertisement proposals should be considered on individual merit and with regard to amenity and public safety.

In the box following paragraph 4.113, the second bullet point partly contradicts the fourth and other advice in the SPD. "Multiple" only means more than one. What we think you mean is that no shopfront should be so cluttered with advertisements as to spoil its appearance and its surroundings. The text of the SPD clearly states that more than one advertisement is acceptable on the same shopfront (e.g. a fascia and a projecting sign). We therefore suggest that the second bullet point should be amended to:

"a building's façade should not be so covered with advertisements as to spoil its appearance and that of its surroundings."

In paragraph 4.115, there is no justification for the suggestion that signs above ground floor level (particularly if illuminated) will not normally be approved. Why not? Many premises in shopping areas have signs (including illuminated signs) above ground floor level; and Tamworth is no different in this respect. There are many projecting/hanging signs above ground floor level in the centre of the town; and even several along Lichfield Street within a few yards of the Council's offices. And there is

no evidence that these signs cause any harm to amenity; in fact, they add to the charm and interest of the street scenes. We suggest that the second sentence of paragraph 4.115 be deleted.

In paragraph 4.118, we understand the intention. But we think that “retail unit” should be amended to “premises’ retail frontage”. This would allow for premises with more than one frontage, e.g. corner shops or pubs.

In the box following paragraph 4.120, in the second bullet point, there is no justification for requiring illumination to be restricted to fascia and projecting signs. Again, why? Whatever the nature of the sign, its impacts on amenity and public safety are the decisive considerations and not just whether it is called a “fascia” or a “projecting” sign. We think that this bullet point should be deleted.

In the same box, in the third bullet point, we think that “face onto any adjoining residential area” is not the proper consideration. A sign may well face towards an adjoining residential area, but this does not make it automatically unacceptable. What matters is its impact. So, we consider that the words “face onto any” should be deleted and replaced with “have any adverse impact on”.

Finally, paragraph 4.126 is incorrect in law. There is no requirement for any sign to have “written” consent from the property owner. The Regulations require only consent. The word “written” should be deleted.

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 and Graphics Association