

Planning Policy Team  
Worthing BC  
Portland House  
44 Richmond Road  
Worthing BN11 1HS

1 November 2018

Dear Sir/Madam,

**Worthing BC - Local Plan – Consultation Draft – November 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 document. In particular, we are concerned with Policy CP6(e) "Public Realm".

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 consider that supporting text paragraph 4.74, second and third sentences, encapsulate all that need be said about advertisement control.policy When read with the requirements of Policy CP5 "Quality of Built Environment" (of which advertisements are a part), the relevant considerations will apply.

Policy CP6(e), in the first sentence, properly reflects the requirements of the Advertisements Regulations in requiring regard to be had to amenity and public safety. This will include an assessment of all the attributes of any proposed advertisement. Why the last sentence of CP6(e) should particularly single out illumination for special consideration is not clear. If an illuminated advertisement causes no harm to amenity or public safety, then it must be acceptable regardless of what form of illumination it includes. And there is no question of the Council having the power to determine what is acceptable "in principle". In part, this equates to a consideration of the "need" for the advertisement in illuminated form. This is not permitted by the Regulations as advised in paragraph ID 18b-026020140306 of Planning Practice Guidance. We therefore

consider that the last sentence of Policy CP6(e) should be deleted as it implies that the Council has powers which it does not have; and it is entirely unnecessary. This first sentence of CP6(e) is adequate for the effective and proper control of advertisements in accordance with the requirements of the law and National Planning Policy and Practice.

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**