

Planning Policy Team  
Barnet LBC  
7<sup>th</sup> Floor  
2 Bristol Avenue  
Colindale  
London NW9 4EW

1 February 2020

Dear Sir/Madam,

**Barnet LBC - Local Plan – Preferred Approach Draft - January 2020**

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 paragraph 6.22.2.

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 are content that draft Policy CDH09 and most of the supporting text conforms to Government policy and practice advice.

However, paragraph 6.22.2 demonstrates a total misunderstanding about Areas of Special Control of Advertisements (ASCAs). The Council's 2006 UDP did not "designate" an ASCA; nor can ASCA designation be "retained and revised" through the local plan process.

Regulation 20ff in the 2007 Control of Advertisements Regulations specifies the procedure for ASCA orders. All ASCA orders (or amending orders) must be approved by the Secretary of State (Regulation 20(3)). The local plan system can neither create nor amend ASCAs. Barnet's ASCA must remain as approved by the Secretary of State.

Paragraph 6.22.2 must be amended to state the law correctly; and, if necessary, the plan (Map 5) must be altered to show only that area which is within an ASCA approved by the Secretary of State.

Yours faithfully

**Chris Thomas**  
**for British Sign and Graphics Association**