



To be Retained by BSGA

Consultation Period: 27/1/20 **To:** 16/3/20
Development Plan: Local Plan – Preferred Options
District: Barnet LBC
Relevant Policies: CDH09
Or Narrative (refs): Paras 6.22.1 – 6.22.3

Background: This Local Plan will replace the adopted 2012 Local Plan (LDF). This draft mainly repeats the previous document. Within the supporting text, it states that advertising can have an adverse impact on the appearance of an area if poorly designed or sited; and that all advertisements will be considered on their amenity and safety implications. Permission will not be granted for advertisements which detract from the character of a building or street.

Policy CDH09 states that the Council will support advert proposals that do not cause unacceptable harm to amenity or public safety; and are sensitively designed and located. They should be of an appropriate size and siting that does not detract from the street scene, neighbouring properties or cause “physical” or visual obstruction, including light pollution from flashing or illumination. The Council will exercise greater control in Areas of Special Control (ASAs) within Barnet.

Paragraph 6.22.2 incorrectly states that Barnet’s ASCA was designated in the 2012 local plan and that this new local plan amends the extent of the area.

Comment: Policy CDH09 and most of the supporting text are acceptable. We have written to the Council pointing out that ASCAs can neither be designated nor altered through the local plan process; and that the ASCA must remain exactly as approved by the Secretary of State (or as amended by him).

Date sent to Council: 1/2/20

Development Plan Monitoring

Planning Policy Team
Barnet LBC
7th 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