

Planning Policy and Heritage Team
Gloucester CC
Herbert Warehouse
The Docks
Gloucester GL1 2EQ

8 November 2019

Dear Sir/Madam,

Gloucester City Local Plan – Pre-Submission Draft – November 2019

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

The BSGA represents 65% of the sales of signage within 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.

Our comments concern Policy D4 and supporting text. We find the policy ridiculous in relation to signage. Why are (criterion 5) “halo” illumination and (criterion 6) “hanging signs of wood and metal” picked out for special mention? Surely, if they are “sympathetic to their surroundings ...” (as criterion 4), they are acceptable. And this would apply to all proposals for signage. Provided it complies with criterion 4, it should be considered acceptable.

Secondly, why the specific reference to colours in criterion 7? Again, colour would form part of the consideration of criterion 4. And what are “very bright” colours? This is so subjective and personal that it cannot be a policy decision. It is taste and choice which should not be dictated by policy. Further, it is unrealistic. The fact is that the commercial centre of Gloucester (including the conservation area and listed buildings) is full of bright colours, as is appropriate to a city centre principal shopping area.

We would also wish to point out that the reference to the Shopfronts, Shutters & Signage Design Guidelines SPD in paragraph 3.4.21 is probably unlawful. We objected (to the consultation draft of this SPD) at thoughtful length to much of the unjustified prejudice in this document in our letter to the Council of 28 November 2016 (copy attached). But the Council totally ignored our representations. The draft City Plan now states that all proposals for signage “should accord with” this guidance. This is an attempt to give the statutory authority of independent examination to a document which has not been given any independent examination and is, in our view, totally unsound in law, government policy and practice.

In summary, therefore, we suggest:

**Policy D4 – criteria 5, 6 and 7 be deleted; and
Paragraph 3.4.21 – the reference to the SPD be deleted, or, at least, altered to
remove the words “accord with” and replace with “take account of”.**