

Guildford BC

(by online Questionnaire response 4/6/20)

Guildford BC Local Plan Part 2 – Development Management Policies – Issues and Preferred Options Draft – June 2020

These representations are submitted on behalf of the British Sign and Graphics Association (BSGA).

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.

We do not consider that Policy D7 is required. It places additional and unnecessary restrictions on businesses who are already struggling to compete with online shopping and keep High Streets alive. The Regulations require that control be exercised only in the interests of amenity and public safety. This is confirmed in the NPPF and guidance is given in the NPG. In our view, this is sufficient for all circumstances. The detail given in the proposed Policy D7 is unnecessary. Specification of scale, colour, materials etc is all covered by the term “amenity”. If an advertisement fails to compliment the building on which it is set or its surroundings (because of any factor of its display), it fails the test of “amenity”. The policy is therefore entirely unnecessary.

Further, the Regulations do not permit the refusal of, or resistance to, any particular type of signage as a generality. Each proposed advertisement must be considered on individual merit. Thus, the last sentence of paragraph 5.31 in the supporting text and draft Policy D7(1) are entirely contrary to the Regulations and national guidance. Why should hanging signs on historic buildings be automatically unacceptable? A brief survey of High Street indicates that there are over 30 hanging signs already displayed along the cobbled section. Somebody must think them acceptable! And why should illumination be “resisted”? This is not a dark countryside area where the stars shine brightly without any intrusion from city lights. The street is well-lit and illumination, per se, cannot be said to be out of place.

As above, all the detail in draft Policy D7(1) and (2) is simply covered by the term “amenity”. As to “the presumption against illumination” proposed in Policy (3), this is ridiculous. **All** premises rely on trading after dark (and before dawn) during the dark winter months. And why should this anyway be a determining consideration? It does not appear to have any relationship to “amenity”. If an illuminated sign is acceptable in terms of amenity and public safety, it is acceptable whether or not the premises trade in the dark hours.

If it is thought essential to darken the street during the quiet hours, the Council may impose conditions on consents for illuminated advertisements that the illumination be extinguished when the premises are closed for trade with the public.

Proposed Policy (5) is unlawful. It relates to the content of the sign. The Regulations specifically state that content or subject matter is not a relevant consideration unless it affects amenity or public safety. Whether the sign relates directly to the premises is again not a consideration of "amenity".

For all these reasons, we consider Policy D7 to be inaccurate, unduly burdensome and wholly unnecessary.