

City Planning Team
Plymouth CC
Ballard House
West Hoe Road
Plymouth PL1 3BJ

14 November 2019

Dear Sir/Madam,

Plymouth and South West Devon SPD - Draft - November 2019

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

The BSGA represents 65% of the sales of signage throughout the UK and monitors development plans throughout the country to ensure that emerging Local Plan Policies and Supplementary Guidance do not inappropriately apply more onerous considerations on advertisements than already apply within the NPPF, Planning Practice Guidance (PPG) and the Town and Country Planning (Control of Advertisements)(England) Regulations 2007 (as amended).

This SPD proposes additional guidance on the adopted policies in the Joint Local Plan. We have particular concerns with parts of this SPD in Appendix 3 “Shop fronts, including ATMs”.

Firstly, in **paragraph 15.3**, there is an implied assumption that “corporate” designs should always be adapted and modified to suit the character of the building and/or location. But this is not necessarily so. There are often shopfronts, buildings and locations where “corporate” styles can be displayed as proposed without any need for particular modification. We suggest that the wording in the third sentence of this paragraph be modified by the insertion of “, where appropriate,” between “modified” and “to suit”.

In **paragraph 15.12 and following**, the statement that “interior signage that can be seen from the highway may require permission” is totally incorrect in law. All advertisements and signs within buildings are either excepted from control under the Regulations or are granted deemed consent. See Class I in Schedule 1 and Class 12 in Schedule 3 to the 2007 Advertisements Regulations. It is a fact that **no** advertisement displayed inside a building needs any form of planning permission or advertisement consent, regardless of whether it may be visible from a highway. It follows that all references below to what “should” be done can only be advisory and the text should make this clear. A shop-owner may, wholly lawfully, cover the entire

windows of his premises with internal advertisement displays without any permission from anyone other than the owner of the premises.

It further follows that **paragraph 15.17** is also incorrect in law. A condition on a planning permission may not deny the deemed consent provisions given generally in the Advertisements Regulations. Any such condition would be ultra vires. This paragraph should be deleted or re-worded to make clear that this is advice only.

In **paragraph 15.35**, the statement that “uPVC will not be acceptable on shop fronts of listed buildings, or in conservation areas” is unduly restrictive. The materials that are appropriate on shop front advertisements will depend to a large extent on the character of the shop front and building. “uPVC” and similar materials may be wholly acceptable on a modern shopfront whether or not the building is listed or within a conservation area. Perhaps this restriction might be more aptly defined as “large areas of high-gloss plastic/uPVC materials are unlikely to be acceptable on listed buildings or in conservation areas”.

In **paragraph 15.40**, the second bullet point fails to take account of innovation in sign design. In particular, there is no recognition that LED illumination is now increasingly prevalent for shopfront sign displays. The smaller size of the luminaries, their long life and their minimal heat generation allows modern “box” signs to be much slimmer and more versatile than their “neon” tube illuminated predecessors. These signs needed thickness in the depth of the box to allow for the bulkier tubes and their fittings, as well as to allow heat to dissipate. We therefore suggest that this bullet point be re-worded to, “Avoiding fully internally illuminated, bulky, box fascia signs which may be crudely attached over existing fascia boards”.

It is hoped that these comments are useful. If you wish to discuss, please contact the writer.