

To be Retained by BSGA



Consultation Period: None **To:**
Development Plan: New Southwark Plan – Submission 1/20
District: Southwark LBC
Relevant Policies: P38 & P42 (previously P38 & P40)
Or Narrative (refs): Supporting "Reasons"

Background: This replacement for the Council's old UDP incorporates work already done on the now abandoned Core Strategy. P38 concerns shopfronts and signage; P42 concerns signage and advertisements. We objected, in November 2014, to much of policy P42 at the "Options" version of this plan.

It stated that adverts must avoid harm to heritage assets and their settings; be designed (size, scale, type, illumination) to be appropriate to the site and surroundings; not harm public safety and not cause light pollution.

The second part of the policy was wholly unacceptable. Illumination was not to be permitted in conservation areas or on or near designated heritage assets. And adverts must not harm trees. The rest of the policy strictly concerned shrouds and hoardings and effectively poorly repeated the first half of the policy (as if shrouds and hoardings were somehow totally different advertisements from any other types).

The Council redrafted the Preferred Options version of the plan. Policy P42 was totally redrafted. It stated little more than that adverts must avoid harm to public safety; should be designed so that their size, scale, type and illumination are unobtrusive, taking into account site context and local character; avoid harm to the significance of heritage assets (listed buildings, conservation areas) or their settings; and do not adversely impact on the streetscape or trees. The second part of the policy was deleted entirely. No doubt for PC reasons, the policy also now states that adverts should "encourage healthy behaviours".

Policy P38 states only that shopfronts and signs must ensure that the proportion, scale, style, detailing, colour and materials make a positive contribution to the host building and its context; and is adequately lit for its context.

We did not bother to object to the silliness of the reference to trees; and most of the rest was acceptable. Basically both policies said no more than that any advertisement should be appropriate to its site and surroundings, which is all down to subjective consideration on merit.

We did object to "encouraging healthy behaviours". This is a policy which seeks to control the content of an advertisement (it might suggest that the Council can refuse to consent to a sign - perhaps for a fizzy soda drink - on the basis that it might encourage consumption of excessive sugar).

The Council have now produced yet another amended version of the Submission Draft. And, at last, it deletes all reference to “healthy behaviours”.

Comment: This version of the plan is the final version now submitted for examination. As it has now been amended, it is acceptable and is unlikely to be further amended during examination. But we will continue to monitor.

Date sent to Council: No further representations required

Development Plan Monitoring