

29/10/20 10:22

Comment Receipt

Event Name	Volume 1 Development Strategy, Strategic and Local Policies
Comment by	British Sign & Graphics Association (- 1251969)
Comment ID	PDV11
Response Date	29/10/20 10:22
Consultation Point	Policy WLP 59 Advertisements and Shopfront Design (View)
Status	Submitted
Submission Type	Web
Version	0.1

Guidance notes

Please be aware that the notes will be displayed below and it is necessary to scroll down the page and click 'Next Page' once they have been read. Each section can be displayed separately (and can also be hidden) by ticking and unticking the appropriate box. If you do not wish to read the notes, click 'Next Page'.

Please tick the sections of the guidance that you wish to read.

Duty to Co-operate

Do you consider the preparation of the Local Plan meets the requirements of the Duty to Co-operate? Yes

Legal compliance

Do you consider the Local Plan is legally compliant? No

Soundness

Do you consider the Local Plan is sound? No

Unsound

Do you consider the Local Plan is unsound because it is not:

- . (2) Justified
- . (4) Consistent with national policy

Changes necessary for legal compliance and soundness

Please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified in the question above (Positively Prepared/Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

With no justification, a sentence has been added to paragraph 7.187 (Advertisements and Shopfront Design). The sentence states that internally illuminated box signs and neon strip lighting will not be permitted on listed buildings. No justification is provided. The rest of this paragraph advises that signs in conservation areas and on listed buildings should preserve and/or enhance the building and area. Policy WLP59 defines how an assessment is to be made (character, scale etc). In combination, this text and policy are more than adequate to establish the policy on the acceptability of advertisements on listed buildings. No further unjustified preconditions may apply for two reasons:

First, the Control of Advertisements (England) Regulations 2007 require all applications for consent to display an advertisement to be considered on an individual basis and on consideration of amenity and public safety. It does not permit a local authority to predetermine certain applications by policy diktat; and

a listed building may well have individual characteristics which would make all sorts of signs acceptable when considered on individual merit. For example, a listed building may (and very often does) have a totally modern shopfront inserted. There is no reason why a suitably designed and located box sign or neon lights must automatically be considered unacceptable on such a shopfront, albeit that it forms part of a listed building.

The final sentence of paragraph 7.187 is unjustified, unnecessary and unlawful and must be deleted.

Previous Comments

Did you make comments on this issue earlier in the process of the preparation of the Local Plan? . No

Previous Comments Reasons

If 'No' please briefly explain why you did not comment earlier in the process:

The objection is to an addition made since the Consultation Draft was published.

Participation at oral part of examination

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? NO, I do not wish to participate at the oral examination