

HEARING STATEMENT

Redbridge LBC Local Plan 2015-2030 - Hearing - Inspector's Issue 9

This statement is submitted on behalf of the British Sign and Graphics Association (BSGA) in response to Policy LP28 and supporting text in the above draft Local Plan. Our substantive comments on the Submission Draft of this document were submitted on 29 July 2016 - the Inspector has a copy (R01181/07 in Individual Representations Part 2).

These comments relate to the Inspector's Issue 9 and only to the proposed Main Modifications. Modification No 126 refers. The modifications proposed remain in some parts unlawful and in others contrary to Government policy and practice guidance. Other requirements in the proposed Modifications are ridiculous and unworkable. In Modification 126:

1(b) : The word "planning" should be deleted. Applications are for "express" consent (or "advertisement" consent). Any reference to "planning" applications is misleading since no specific planning permission is required for advertisements. See the wording in the second sentence of this paragraph which is correct.

1(b) : The second sentence is ridiculous. There will be thousands of commercial premises in conservation areas which are not part of a town centre. What about corner shops, offices, churches, community premises, hotels, hospitals? According to this policy, all such premises within conservation areas but outside town centres will be denied any signs at all. This is ridiculous and unworkable. The second sentence should be deleted entirely.

The third sentence is equally baffling. "Outside these locations" - what locations? Conservation areas and/or town centres and/or town centres within conservation areas? Regardless, this sentence is contrary to Government advice in Planning Practice Guidance "Advertisements" paragraph ID 18b-026-20140306:

"Unless the nature of the advertisement is in itself harmful to amenity or public safety, consent cannot be refused because the local planning authority considers the advertisement to be misleading , **unnecessary**, or offensive to public morals."

The whole of this third sentence should be deleted.

2 : "to be acceptable in principle". What does this mean? What principle? All advertisement proposals must be considered on merit - there can be no "principle" which automatically excludes any type of advertisement. "in principle" should be deleted.

2(b): The word "content" should be deleted. Local authorities are expressly forbidden from controlling "content" unless it specifically impacts upon amenity and public safety - see Regulation 3(4) of the 2007 Control of Advertisements Regulations.

2(c): "Supporting" fascia etc. What does this mean? What are these signs "supporting"? The word adds only confusion and should be deleted. "must be of an appropriate height ground floor levels." This can only refer to shopfronts and is unnecessary since the first part of the sentence already requires consideration of architecture and design. We have already explained that some wholly acceptable signs need not necessarily be restricted to ground floor levels - and there are many, many thousands of examples of signs above ground floor levels within this London Borough. "must be of an appropriate height ground floor levels" should be deleted.

2(c): Last sentence. This is ridiculous. The Department's booklet is informative only. It does not "stipulate" anything. Deemed consent restrictions are found within the Regulations themselves. They have no place in a local authority planning document. The sentence adds nothing, will mislead readers and should be deleted.

2(e)(i): "relate to an existing building or its forecourt". What does this mean? Does it mean "on" an existing building or forecourt? Does it mean relate in terms of visual amenity? Or relate in terms of content? At all events, it is unclear. We suggest the sentence (i) be deleted and replaced with, "not detract from the visual amenity of the building or site on which it is set" (the surroundings are covered in (e)(ii) and (iii))

I do not wish to appear at the Inquiry; but am prepared to provide any further statement that the Inspector may require.

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Agent for the British Sign and Graphics Association