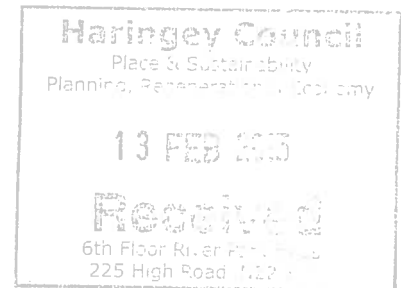


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Local Plan Consultation
Planning Policy
London Borough of Haringey Council
River Park House
225 High Road
Wood Green
London N22 8HQ



10 February 2015

Dear Sir/Madam,

**London Borough of Haringey Local Plan – Development Management Policy
DPD - Preferred Options February 2015**

These representations are submitted on behalf of the British Sign and Graphics Association in response to Policies DM7 and DM8 of the above draft DPD.

The BSGA represents 65% of the sales of signage throughout 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 NPPF, Planning Practice Guidance (PPG) and the Town and Country Planning (Control of Advertisements)(England) Regulations 2007 (as amended).

We commented on the first and second drafts of this document in May 2010 and March 2013. We are disappointed that some of our comments have not been heeded and that the draft DPD still exceeds by far the criteria permitted in the Regulations and the advice in National Planning Policy and Practice Guidance.

It should be noted that paragraph 4 of the PPG "Advertisements" makes clear that should local policies be considered necessary for the control of advertisements, they should be evidence based

Policy DM7(F) is totally appropriate and adequate for the control of advertisement displays on shopfronts. We support this policy. However, the supporting text goes far beyond the considerations in the policy and are excessively and disproportionately prescriptive. It is most certainly not "evidence based". It is full of prejudices and assumptions. As to detail:

Para 2.42 - second bullet point. Sign written lettering is now so rare and expensive that it is not a practical choice. There are not enough signwriters left in the UK to fulfil this policy in Haringey alone, yet alone all the rest of the UK. The sentence "individual cut letters, stating the name and trade of the premises and the shop number" is wholly beyond the powers of the Council. Why should letters be individually cut? There are all sorts of designs for lettering which will be acceptable. And any attempt to dictate the content of a sign is beyond the Council's legal power - see Regulation 3(4) of the 2007 Regulations. We would suggest that this bullet point be reduced to simply "Lettering/logos should be in proportion to the size of the fascia and the shopfront as a whole."

Para 2.42 - third bullet point. There is no justification for the proposed ban on internally illuminated "box" fascia signs. Modern "box" fascia signs are now commonly slimline (little more than about 100mm deep); they may be recessed into the fascia; and they are often designed so that only the lettering illuminates on an otherwise unlit backing panel. Similarly, "halo" illumination (which still requires a "box" sign of sorts) is often commonly acceptable even in the most sensitive areas. We would suggest that this bullet point ought to be amenity based and suggest "Bulky, fully internally illuminated box fascia signs are unlikely to be acceptable".

Para 2.42 - fourth bullet point. See above on the content of the sign. The words "describing the name or trade of the shop" should be deleted. We would also suggest that the exceptions could also include single very large (Department-type) stores in a single building where the length of the frontage could accommodate more than one projecting sign without harm to amenity.

Para 2.43 - first two sentences. This is ridiculous. In general, the determining factor as to what form of fascia sign is appropriate will be the design of the shopfront and the building as a whole. For example, a timber panel would look wholly out of place above a modern, fully glazed, aluminium-framed shopfront. We suggest that these two sentences be deleted and replaced with "Greater care is required where the premises are a Listed Building or in a Conservation Area."

Para 2.44 - why should materials and colours be "of a limited range"? And what does this mean? Do you really expect a busy, thriving shopping area to be limited in the range of colours and materials? Acrylic-type materials (mosaic is so rare as not to be worth mentioning) are commonly used in shopfront signage throughout the UK. They are hard-wearing, requiring little maintenance and versatile. Why should they be unacceptable in Haringey? Can the Council point to a single example of "unfinished" metal? For its own protection, metal is invariably "finished", either by painting, powder-coating or some other method. Why should "bright" colours be avoided? It would be a dull shopping centre indeed without bright colours. As to window stickers and posters within shop windows, these forms of advertisement are excepted from the Council's control or have deemed consent under Class I in Schedule 1 or Class 12 in Schedule 3 to the Regulations. They are effectively beyond the Council's control. Finally in this paragraph, why should the Council ask for "corporate" signage to be changed, unless this is required in the interests of amenity? If this is what the Council consider necessary, the text should make it clear. But, in all, we consider that

this paragraph 2.44 is so excessive and unenforceable that it should be entirely deleted.

Para 2.45 - this paragraph is meaningless. It only repeats paragraph 2.42. It should be deleted.

Para 2.54 - how many times must we tell you that the correct title is the Town and Country Planning (Control of Advertisements)(England) Regulations 2007?

We consider that the Council's overall approach to advertisement control is entirely negative. Advertisements are an integral part of the urban environment, just as much as buildings, trees and traffic. The only policy which is really required is that well-designed and sited advertisements enhance the urban environment and are to be welcomed.

Yours faithfully

Chris Thomas
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