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Planning Policy Team
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Dear Sir/Madam,

Barnet LBC - Local Plan - Publication Draft - June 2021

These representations are submitted on behalf of the British Sign and Graphics Association (BSGA) in response to the consultation on the above draft Local Plan document. In particular, we are concerned with paragraphs 6.34.1 - 6.34.7 and policy CDH09.

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 National Planning Policy Framework, Planning Practice Guidance and the Town and Country Planning (Control of Advertisements)(England) Regulations 2007.

We commented on the Preferred Options Draft in February 2020. As a result, you have removed all the nonsense about Areas of Special Control. But you have added several new paragraphs and extra criteria both in the policy and supporting text. Much of this has clearly been imported wholesale from an older document (the reference in paragraph 6.34.6 to the long revoked 1992 Regulations is a complete "giveaway"). Some of this is misleading; some is unrealistic, unduly restrictive and unachievable.

We are particularly concerned with paragraph 6.34.4 (much of which is more relevant to the public realm section - advertisements cannot be placed on street furniture if that street furniture does not exist in the first place!). The advice that "shopfront advertisements will generally only be acceptable at the ground floor level, at fascia level or below" is unrealistic and unduly restrictive. Even looking at an average shopping street in the Borough (take, for example,

Ballards Lane in Finchley), it is clear that there are already many, many signs displayed on business premises above fascia level. This is particularly so in the case of bracket-hung projecting signs which are traditionally hung above fascia level to allow headroom on the footway. These should not be considered "exceptional" (as in policy CDH09). They are common and very much part and parcel of most shopping streets. Any advertisement can appear "obtrusive and unattractive" and can "cause light pollution" to neighbours. This is not solely as a result of the height at which it is displayed. For instance, in Ballards Lane, the Council's own advertising banners are displayed on street lamps above the general fascia level - yet these are presumably acceptable in terms of amenity and public safety. We would suggest that the last two sentences of paragraph 6.34.4 be deleted and replaced with:

"Advertisements on shopfronts should relate well to the design of the shopfront where there is one. Generally, advertising at fascia level and below will be acceptable, as well as signs which are traditionally displayed at higher levels, for example hanging signs at public houses and on other frontages where the sign will not adversely affect the character or appearance of the upper storeys of the premises. Illuminated signs should be carefully designed and sited so that their light does not have any adverse impact on any neighbouring residential properties."

In respect of estate agents' boards, paragraph 6.34.6 will not be understood by anyone other than an expert in advertisement control. The Council should understand that the withdrawal of deemed consent by a direction under Regulation 7 must be approved by the Secretary of State; and that he is unlikely to approve such a direction unless the Council has in place (following meaningful consultation with interested parties) guidelines which allow for "for sale/to let" advertising in acceptable forms (eg boards flat to the face of buildings). We suggest the last three sentences of this paragraph be deleted and replaced with:

"The Regulations controlling the display of outdoor advertising generally allow the display of "for sale/to let" advertising boards (commonly called estate agents' boards) subject to certain restrictions on size, number and position. But where these boards proliferate to the extent of causing serious harm to the appearance of a street or area, the Council may seek approval for the removal of the general approval for these types of advertising boards. In this event, the Council will provide guidance on what alternative forms of advertising properties for sale or to let are acceptable (for example, boards flat to the face of a building are far less obtrusive in the street)."

We therefore suggest that, in policy CDH09, paragraph (d) - (you may like to consider renumbering and realigning this policy text and consistency in upper and lower cases - for example, paragraph (d) is aligned as a subparagraph of (a)!) -

be deleted. The advice is more relevant to the section on public realm and reducing street clutter rather than on any advertisement which may utilise existing street furniture. We further suggest that the final unnumbered paragraph "The Council will resist ...except in exceptional circumstances" also be deleted for the reason we give above.

Yours faithfully

Chris Thomas

for British Sign and Graphics Association