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Strategic Policy and Research
Future Merton
Merton LBC
12th Floor
Civic Centre
London Road
Morden SM4 5DX

8 February 2013

Dear Sir/Madam,

Merton LBC – Sites and Policies DPD – Stage 3 Draft, January 2013

These representations are submitted on behalf of the British Sign and Graphics Association in response to Policy DM D5 of the above draft LDF 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, Circular 03/2007 and the Town and Country Planning (Control of Advertisements)(England) Regulations 2007 (as amended).

We are glad to see that our comments on the earlier drafts of this document have been found to be useful. We consider that this draft is a much improved, simpler and more balanced document to which we can mostly give our support.

There remains only a single inaccuracy. In the last sentence of paragraph 6.50, the 2007 Regulations only permit the use of discontinuance powers where an advertisement is causing "substantial injury" to amenity. Accordingly, in this sentence, "adversely affect" should be deleted and replaced by "substantially injure". This would then follow the requirements of the legislation.

It is hoped that these comments are found to be useful and informative, if you have any further questions, please contact me.

Yours faithfully

A handwritten signature in black ink, appearing to read 'A. R. al'.

Chris Thomas
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