Paragraph 6.43 would appear to be mostly unnecessary. The Council own the public realm; and they therefore have full control over all advertisements displayed therein as landowner. This also applies to advertisements on the pavement (second sentence of paragraph 6.44). Perhaps all this text could be reduced to a simple statement that the Council will take particular care to ensure that advertising within the public realm is well-managed.

Paragraph 6.44 is a confusion of different strands. The comment on “proliferation” is repeated from paragraph 6.42 and should be omitted.

Paragraph 6.45 is again a repeat of the “proliferation” advice in paragraph 6.42. Paragraph 6.45 should be deleted.

In Paragraph 6.62 (misnumbered as 1.62), the first sentence of paragraph (b) of the “Policy” is grammatically incorrect. And perhaps the Council can explain how any shop fascia can “enhance” residential amenity! It is to be expected that any advertisement will not detract from residential amenity; but “enhancement” escapes the mental capacity of the author.

In paragraph 6.54, what if the style existing on the street is not “traditional”? And even if it is, does this mean that there can never be anything new? The first sentence of this paragraph should be deleted.

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

Yours faithfully

[Signature]

Chris Thomas
Chris Thomas Ltd

1 February 2012

Dear Sir/Madam,

Merton LBC – Sites and Policies DPD – Consultation Draft, January 2012

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 PPG19, Circular 03/2007 and the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (as amended).

In DM D5, the “Policy” should refer to the granting of express consent – planning permissions are not granted for advertisement displays. In the third line of the “Policy”, what is meant by “defined” character? “Defined” where? We consider that “defined” is unnecessary and should be deleted.

Paragraph 6.42 does not make sense. We do not believe that it can be said that a particular “form” of advertising is necessarily intrusive through proliferation (although a proliferation of any, or all, forms of advertising can be intrusive). We consider that the first sentence of paragraph 6.42 is an important consideration; but, for clarity, that the rest of paragraph 6.42 should be deleted and replaced with:

“However, it is important that advertising material (including advertisements which may be considered individually acceptable) does not proliferate to an extent to spoil the appearance of individual buildings or the street. The Council will be vigilant in using its powers to prevent such an excess.”