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CONTACT DETAILS REDACTED

Future Merton Team
Merton LBC
Civic Centre
London Road
Morden SM4 5DX

24 July 2021

Dear Sir/Madam,

Merton LBC - New Local Plan Stage 3 - Publication Draft, July 2021

These representations are submitted on behalf of the British Sign and Graphics Association in response to Policy D12.7 of the above draft Local Plan.

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, PPG and the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (as amended).

We are content that Policy D12.7(a) and (b) (i)-(iv) are consistent with the requirements of the Regulations and national planning policy advice and practice. But we consider that (b) (v) exceeds the Council's powers and has no place in policy advice. All advertisements within buildings are either excepted from control or have deemed consent. They are therefore outside the Council's initial control. Policy D12.7(b) (v) implies that the council have some control over these advertisements which they do not have. Similarly, "artwork and blinds" within shop windows are most unlikely to be controllable by the Council. And why should the Council presume to involve itself in the internal layout and design of business premises. There may be very good reasons for preventing views from the street into the building or parts of it. Areas behind counters where there are shop tills or safes or storage of particularly valuable items may require screening for security and safety. And what about gyms and the like where those exercising do not want to be objects of interest to passers-by?

The "advice" in (b) (v) is a matter of individual choice and has no place in Council policy. Does the Council really think that whether a person installs a simple blind within their premises is a matter with which they should involve themselves?

We therefore suggest that Policy D5.6(b) (v) be deleted. The final sentence of paragraph 12.7.3 also needs amending to identify "its".

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

Yours faithfully

Chris Thomas
for British Sign & Graphics Association