Ms Andrea Copsey  
Walthamstow Town Centre AAP Programme Officer

2 October 2013

Dear Ms Copsey,

Walthamstow Town Centre AAP – Submission Version and Schedule of Post-Publication Minor Changes - September 2013

These representations are submitted on behalf of the British Sign and Graphics Association in response to changes to the Proposed Submission version of the above AAP, as made by the Schedule of Post-Publication Minor Changes.

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).

In response to our comments on the Proposed Submission, the Council have made significant changes to the published document, in particular, the deletion of paragraph 12.23 and substantial deletions in paragraph 12.25. We support these changes.

However, we note that, in the Schedule of Post-Publication Minor Changes, Change D5 substantially alters policy WTC11. Firstly, we would wish the Inspector to consider whether this can properly be considered to be a "Minor Change"; and be considered without any further consultation.

We would draw particular attention to proposed replacement Policy WTC11(b)(i). This states that "boxed" fascia signs should be avoided and that fascia signage should be kept within the original shop framework. We have no argument with the part of the policy relating to positioning signs within the original shop framework, although we would suggest that "where there is one" be inserted after "original shop framework". Many shopfronts within the AAP do not have "original shop frameworks" and where replacement signage only is proposed, it would not be possible to comply
fully unless this policy is amended as we suggest (you cannot put a new fascia sign within a "framework" which simply is not there!).

Of greater concern is the suggestion that "boxed" fascias should be avoided. This is a wholly new Policy requirement - there was no similar (or even vaguely similar) policy in the Proposed Submission version. There has thus been no opportunity to comment on this proposal which cannot in any sense be considered to be a "Minor Change". Even a cursory inspection of the AAP designated area will show that probably well over 50% of fascia signs on shopfronts could be described as "boxed". Indeed, we would estimate that 90% of shopfronts nationally contain some form of "boxed" fascia sign. A "Boxed" fascia sign is not just a crudely attached bulky box with light shining brightly through a gaudy plastic face. "Boxed" fascia signs are available in a wide variety of designs. They can be slim, recessed into the fascia and made in matt materials. Illumination can be achieved through subtle means of fret-cutting an otherwise opaque panel, "halo" illumination, or a series of individual "Box" letters individually mounted on the fascia. In general, a modern, well-designed "Box" fascia usually appears wholly acceptable and in character with a more modern-style shopfront (and can even be designed to compliment more "traditional" style shopfronts). There is no justification for the Council’s proposed blanket ban on "Boxed" fascia signs in proposed Policy WTC11(b)(i) when considered on grounds of visual amenity.

Further, the Control of Advertisements Regulations do not permit any such blanket ban on a particular form of advertisement. Regulation 3 (as confirmed in paragraph 67 of the NPPF) requires each proposal to be considered on individual merit on grounds of amenity and public safety without preconceived policies as to the acceptability or otherwise of particular types of signs.

We therefore consider that the Change D5 to Policy WTC11(b)(i) is not a "Minor Change" and should not be accepted without further consultation, since it introduces an entirely new policy concept. In this respect, the consultation undertaken by the Council is deficient and unlawful. Further, we consider that (if the Change is to be considered on merit), it is unsound and contrary to the law and Government Policy. Finally, in view of the actual nature of the area, we believe that it is impractical.

It is hoped that these comments are found to be useful and informative, if you have any further questions, please contact me. I have sent a copy of this letter to Waltham Forest LBC’s AAP Project Manager (Ian Butcher).

Yours faithfully

Chris Thomas
Chris Thomas Ltd