

APPENDIX I: TABLE OF REPRESENTATIONS, AND THE COUNCIL'S RESPONSE AND RECOMMENDATIONS FOR ANY CHANGES TO THE CONSULTATION DOCUMENT IN RELATION TO THEM – FOR DESIGNATING ASCA.

Rep. No(s)	Representation By	Summary of Representation	Officer Response	Recommendation
1.	Local Resident	Having received and read your letter regarding the proposal to designate areas of Swale as ASCA. I'd like to say I wholeheartedly agree with your proposed controls and locations. Additionally, I'd like to say as well as oversized advertising that is ugly, I find the cheap moving LED lettering display signage, that many food outlets have, to be extremely ugly and make the townscape look awful, especially in the evening. Please if there could be a curfew or other time restriction on this sort of signage I'd be very grateful. I hate how they dominate after sundown.	Support welcomed. ASCA will strengthen control over illuminated and moving digital signage. Curfews fall outside ASCA scope but may be considered through other policy mechanisms.	No change. Note for future policy consideration.
2	Local Resident	Despite having a sign company, I am in favour of regulating poorly designed and oversized signs. It would also be nice to have – absentee landlord shop fronts – to be offered to decorate with local business advertising rather than unsightly empty units.	Support noted. Suggestion regarding empty units is outside ASCA scope but aligns with wider regeneration initiatives.	No change. Forward suggestion to Economic Development.
3	Ward Member	I am writing in support of the proposed ASCA in Queenborough. I would like to see the ASCA extend to the whole of the conservation area.	Support welcomed. Proposed boundary	Change the boundary of proposed ASCA to cover the

Appendix I DESIGNATING ASCA. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

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			focuses on areas of highest sensitivity. Extension to be implemented.	entire Conservation Area. See Appendix III for detailed assessment.
4	Local Resident	Preston Street is an attractive street, linking the station with the centre of town. It has small shops, cafes, pubs, takeaways and social spaces like the Alexander Centre, the Assembly rooms and the museum and Faversham society bookshop. It has 2 or 3 empty properties but is better than most high streets. It has a considerable footfall at weekends as people come down from the station to go shopping and visit cafes. Also, at events like the Easter Parade and the Hop Festival. Apart from rather too many A signs on the pavement the only real problem, as far as advertising is concerned is the 2 betting shops Coral and Jennings Bet. They both have large, illuminated screens with moving images which certainly transgress the proposed guidelines on the proportion of frontage allowable for advertising and illuminated and large format advertisements. They are intrusive and spoil the atmosphere of the street. Please find photos attached.	Concerns align with ASCA purpose. Digital screens of this scale unlikely to be acceptable under ASCA.	No change. Add to targeted enforcement review.

Appendix I DESIGNATING ASCA. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
				
5	Ward Member	I am fully supportive of all the areas listed for consultation being designated. The council needs as many tools as possible to preserve the character and setting of our high streets. Each conservation area very carefully details the aspects the council seeks to preserve, and already we can see many example of advertising and shop fronts that detract from the heritage appeal of our high streets. My only concern is the council's ability to adequately enforce.	Support noted. ASCA provides clearer statutory grounds for enforcement.	No change. Note for service planning.
6	Local resident	I live in Milton Regis and fully support the area coming under ASCA. There is a great need for additional control over the display of outdoor advertisements. Some shops in Milton Regis have garish and large areas of display on their windows and seeing as this a conservation area this	Support welcomed. ASCA strengthens enforcement tools.	No change. Refer to planning investigations

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Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		should never be allowed. Homeowners have to comply with conservation rules, yet it appears some businesses do not, as their windows are covered with painted signs. It brings down the whole area.		
7	Local resident	Reasonable but meaningful constraints on advertising displays are essential if we are to preserve the global attraction of our heritage. Anything other than this approach is short term and ultimately damaging. Having just returned from a visit to a Faversham sized town in the U.S., it struck me whilst there, how unrestricted advertising hoardings had robbed much of the town centre's appeal, leaving me feeling relieved that we don't - as yet- allow that here.	Support noted. Reinforces need for proactive advertisement control.	No change.
8	Local resident	I would like you to introduce tighter regulation and fines with regard to illegal fly posting and commercial advertising right across the Swale area. Not only within Town Centres but elsewhere. With special attention regarding illegal advertising and flags along public highways.	Outside ASCA scope but relevant to wider enforcement.	No change. Forward to Environmental Enforcement.
9	Queenborough Town Council	Queenborough Town Council response in relation to 'Map CA 005 Key questions for Queenborough Conservation Area' as part of the above consultation. At the Council meeting held on Tuesday 28th April, Town Councillors agreed for the sites within the blue outline to be designated as ASCA for any future new advertisement display.	Support welcomed. Existing lawful signage unaffected. Proposed boundary focuses on	Change the boundary of proposed ASCA to cover the entire Queenborough Conservation Area. See

Appendix I DESIGNATING ASCA. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		Advertisements already in place, should be allowed to remain as they are. Councillors agreed for the boundary of the proposed ASCA to be drawn to match the Conservation Area boundary for any future new advertisement display. Advertisements already in place, should be allowed to remain as they are, Advertisements already in place, will then not attract any further expense to businesses and organisations at this time, in adhering to the new control.	areas of highest sensitivity. Extension to be implemented	Appendix III for detailed assessment.
10	Local resident	This is a very good idea. Maybe enforce existing laws first? Milton Regis has the majority of historic buildings used as shops non-compliant, why is this allowed? What efforts have been made with enforcement?	Support noted. ASCA strengthens enforcement basis.	No change. Add to enforcement review.
11	Local resident	I express my support in all regarding to the conservation of the areas mentioned.	Support welcomed.	No change.
12	Local resident	Having lived in Sheerness for 46 years it saddens me that in this time the High Street and surrounds have deteriorated so badly with neglect apparent in many areas and a “ don’t care attitude “ from some of the residents. There are efforts to improve but these are disjointed and somewhat random. I was born in Faversham and the contrast is stark, there the history and culture have been celebrated, appreciated and encouraged,	Support noted. ASCA will help improve visual amenity.	No change.

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Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		resulting in a vibrant and pleasant town to visit... I have always wondered why the same has not happened in Sheerness, with a more sensitive and appropriate approach to the history and environment. So many wonderful buildings gone, never to return sadly so I am all for preserving what is left and preventing crass development with no link to the historic past....		
13	Local resident	As residents of Milton Regis and active members of Milton Regis Society we strongly endorse Swale Borough Councils move to designate a number of Areas of Special Control of Advertisements (ASCA) The need for this in our particular conservation area has been long overdue because of persistent and cynical abuse of rules applying to listed buildings and conservation areas. Shopkeepers from overseas have introduced garish plastic fascia boards with inappropriate signage on lovely old buildings whilst feigning ignorance and being obdurrant when asked to remove them by the authorities. Better protection would thus help officers with enforcement and provide greater overall clout when dealing with the many breaches that have despoiled this otherwise gem of a high street - including one of Kent's only two extant Court Halls.	Support welcomed. ASCA strengthens enforcement tools.	No change. Add to enforcement priority list.
14	Local resident	Many thanks for your letter of March 25th concerning the proposed Areas of Special Control of Advertisements. I would very much welcome any measures that enhance and protect the historic	Support noted.	No change.

Appendix I DESIGNATING ASCA. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		importance of Greenstreet (London Road, Teynham). The area is rich in history which is so often overlooked. Please do all you can to maintain and preserve its character.		
15	Local business	I write in response to the consultation on the proposed designation of an Area of Special Control of Advertisements (ASCA) across eight Conservation Areas, including Milton Regis. Having reviewed the consultation document and the implications of the proposed restrictions, I wish to register a formal objection to the introduction of an ASCA in this location. 1. The socio-economic context of Milton Regis makes the ASCA inappropriate and potentially harmful Milton Regis is an area facing significant socio-economic challenges. Levels of deprivation, visible decline, and persistent anti-social behaviour, including vandalism, graffiti, and criminal damage, are well-documented issues affecting the High Street and surrounding neighbourhoods. These concerns are not abstract; they are daily realities for residents, businesses, and property owners. Introducing an ASCA in such a context risks prioritising aesthetic regulation over urgent, structural problems. The consultation document states that ASCAs are intended for areas requiring “special protection due to their scenic, historic, architectural or cultural significance.” However, Milton Regis is not currently benefitting from such protection in practice due to the scale of	Concerns acknowledged. ASCA regulates scale/illumination but does not prohibit signage. Evidence shows improved visual amenity supports economic vitality. Controls are proportionate and targeted. See end of this report for detailed response	No change.

Appendix I DESIGNATING ASCA. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		deprivation and neglect. Imposing additional restrictions on businesses, many of which are already struggling, does not address the root causes of decline and may, in fact, exacerbate them. 2. The proposed restrictions risk undermining business viability in an already fragile local economy The proposed ASCA would introduce strict limits on: • Lettering size (maximum 0.3m) • Advertisement height (maximum 3.6m) • Proportion of frontage used for advertising (maximum 10%) • Certain illuminated or large-format signage These measures may be appropriate in affluent, well-maintained heritage centres. They are not appropriate in a deprived commercial area where businesses rely heavily on visibility, footfall, and the ability to differentiate themselves in a challenging retail environment. Small independent businesses—already contending with inflation, rising costs, reduced consumer spending, and the aftermath of the pandemic—depend on effective signage to survive. Restricting their ability to advertise risks: • Reduced visibility and competitiveness • Lower footfall • Increased vacancy rates • Further deterioration of the High Street		

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Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		This is the opposite of what Milton Regis needs. 3. The proposal does not sufficiently consider the cumulative impact on regeneration efforts The consultation document notes that “6 out of 8 conservation areas... are on Historic England’s Heritage at Risk register.” This is a symptom of long-term underinvestment, not excessive signage. Before imposing additional regulatory burdens, the Council should prioritise: • Tackling anti-social behaviour • Improving public realm maintenance • Addressing graffiti and vandalism • Supporting business retention and attraction • Investing in regeneration and community safety An ASCA does not address any of these issues. Instead, it risks creating a more hostile environment for businesses and investors at a time when the area urgently needs economic stimulus. 4. The ASCA may unintentionally accelerate decline rather than protect heritage The intention behind the ASCA—to preserve historic character—is understandable. However, in areas like Milton Regis, the historic environment is already compromised by: • High vacancy rates • Poor building condition • Anti-social behaviour		

Appendix I DESIGNATING ASCA. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		• Lack of investment Restricting signage will not restore heritage value. On the contrary, it may: • Discourage new businesses from opening • Reduce the ability of existing businesses to attract customers • Increase the number of empty units • Lead to further deterioration of the streetscape A thriving, economically active High Street is the best protection for heritage assets. Over-regulation risks achieving the opposite. 5. The Council should consider alternative approaches that support both heritage and economic resilience Rather than imposing an ASCA, the Council could pursue more balanced and constructive measures, such as: • Targeted enforcement against genuinely harmful or inappropriate signage • Incentives for heritage-sensitive shopfront improvements • Grants or support schemes for façade restoration • Public realm improvements • Partnership working with local businesses to develop voluntary design guidelines These approaches protect heritage without imposing disproportionate burdens on businesses in deprived areas.		

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Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		For the reasons outlined above, I strongly object to the designation of an ASCA in Milton Regis. The proposal does not reflect the socio-economic realities of the area, risks harming already vulnerable businesses, and may undermine rather than enhance the long-term vitality and heritage value of the High Street. I respectfully request that Swale Borough Council reconsider the inclusion of Milton Regis in the proposed ASCA and instead prioritise measures that address the underlying causes of decline and support sustainable regeneration.		
16	Local resident	With respect, there are so many other things within Swale that need 'fixing' at the moment, the time &/or money could be far better used elsewhere in the Borough rather than wasting time on 'the height of lettering or symbols' etc. unless they are ridiculously large. Please put the time into helping residents & ensuring a better service before anything like the above!	Comment noted. ASCA supports wider regeneration and heritage objectives.	No change.
17	Local resident	Seriously you are worried about the display of outdoor advertisements when Swale Borough Council have completely ruined the Historic High Street by allowing HMO right in the middle of listed buildings. So where is the special protection for us due to the scenic, historic, architectural and cultural significance of The High Street, Queenborough. Just unbelievable that you have allowed this and you are worried about a few signs.	Comment noted. ASCA is separate from planning decisions relating to HMOs.	No change.
18	Local resident	Thank you for the opportunity to comment on your proposal on the designation of an Area of Special Control of Advertisements	Support for the ASCA is noted. The concerns	No change

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Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		(ASCA) with Swale. My following comments are in respect of the Cellar Hill and Greenstreet Conservation area. In answer to your question, I wholeheartedly support that the area within the blue line should be designated as an ASCA. This aligns with the concerns brought to our attention during our consultations on the Lynsted Parish Design Statement. In particular the following sections: (Page ii) General principles 17. Signage. Given the rural and historic character of the area, the introduction of poster hoardings should be avoided, whilst other advertisements should be appropriate to their surroundings and avoid a proliferation of signs and repetition of information. Internally illuminated signs should not be permitted. Professionally hand-painted wooden signage is to be encouraged. External spot lighting may be considered where this can be provided unobtrusively. (Page 25 – Annex 2) Community Action Plan - The Community with Lynsted Parish Council and Swale Borough Council 4. Swale Borough Council to be encouraged to develop policies for Areas of Special Control of Advertisements (ASCAs) with a general presumption against advertising and a complete ban on advertising hoardings, balloon advertising and certain illuminated advertisements in the Parish of Lynsted. (Page 25 – Annex 2) Highways and Paths 43. Street furniture should always tie in with the adjacent buildings and spaces in order to emphasise its essentially rural nature. Modern intrusions such as concrete bollards, metal-panelled	raised about intrusive, illuminated and pavement-based advertising align with the Design Statement and reinforce the need for tighter control to protect amenity and pedestrian safety. The issues raised are consistent with the aims of the ASCA and reinforce the need to manage visual clutter, protect amenity, and safeguard pedestrian safety. Concerns regarding illumination, pavement	

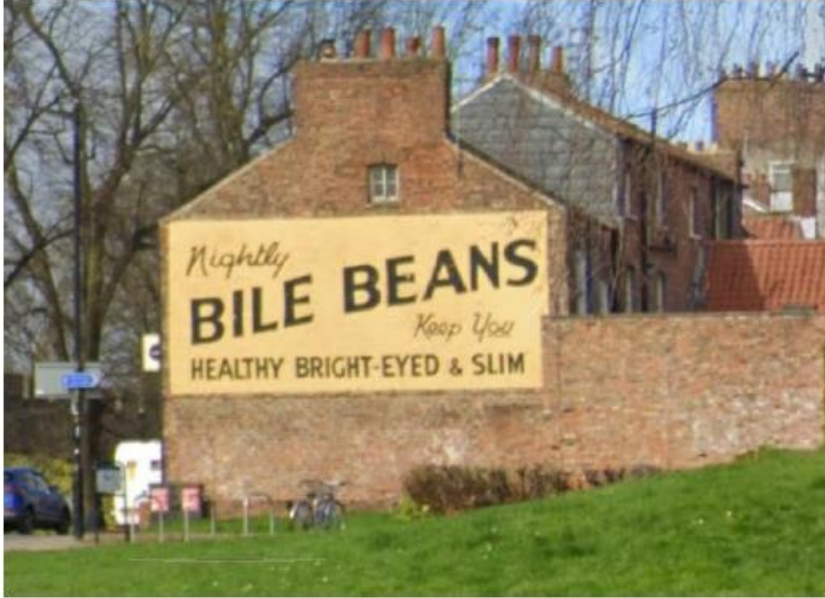
Appendix I DESIGNATING ASCA. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		fences and illuminated advertising on bus-shelters should be avoided. Good examples include use of cast iron bollards and 'traditional' forms of street lighting using cast iron designs. The brick bus-shelter in Kingsdown is an example of traditional design and materials preferable to steel and plastic. In addition, since the publication of the Design Statement, we have seen an increase in pavement signage as illustrated in your consultation document: In addition to this being unsightly, it is also a dangerous obstruction of the pavement. With parking on the pavement and the addition of these signs, vulnerable pedestrians (wheelchairs and buggies) are forced into the road to continue along the road. We have also seen an increase in illuminated shop signage that stays on all night and is disturbing to those living opposite. In recent years we have found areas along Greenstreet where songbirds now sing all night because of excess lighting.	obstruction and impacts on character have been taken into account in forming final recommendations.	
19	CPRE Kent	Designating Area of Special Control of Advertisements CPRE Kent's Historic Buildings Committee is pleased to respond to your consultation of April 2026. Broadly, we welcome any initiative that preserves or enhances the significance of Conservation Areas and on behalf of CPRE Kent more generally preserves or enhances designated National Landscapes. We make the following responses to the questions included at the end of the consultation document. Q1 Do you agree with the proposal to designate an ASCA in the eight Conservation Areas with commercial centres? Yes	Support for ASCA designation is welcomed. Comments on the rigidity of dimensional controls and the importance of contextual, materials-led assessment are	Change the boundary of proposed ASCA to cover the entire Conservation Area. Cellar Hill & Greenstreet, Milton Regis, Newington High Street and

Appendix I DESIGNATING ASCA. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		Q2 Should land within the Kent Downs National Landscape be included in the ASCA? Not in addition to the conservation areas. We accept that there are already sufficient controls on advertising in National Landscapes as mentioned in your document. Q3 Are there any areas that should not be included in the ASCA? None in the areas you are proposing. Q4 Are there any additional areas that should be considered for inclusion? We comment on this below. Q5 Do you think stricter controls on lettering size, advertisement height, and shopfront coverage are appropriate for historic high streets? We would suggest the proposed controls are too rigid. It is not just a question of lettering size, height and coverage. What matters is whether the proposed signage is appropriate in the location. This example in York, in a Conservation Area, is entirely in keeping with the building it adorns, for example (courtesy Google streetview).	noted. The suggestion to align ASCA boundaries with full Conservation Areas is acknowledged; in several areas (Cellar Hill, Milton Regis, Newington High Street, Queenborough) the option of extending the ASCA to the entire CA will be reviewed for consistency and clarity. Concerns regarding national chain branding, reflective materials, and the need for proportionate	Queenborough See Appendix III for detailed assessment

Appendix I DESIGNATING ASCA. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		 A more likely application could be for a logo that exceeds the proposed 300mm height but is still in keeping with the building and nearby buildings. This could be acceptable. On the other hand, blatantly modern materials for a fascia such as bright shiny plastics could harm a historic building or streetscene even if meeting the proposed dimension rules. Q6 Do you believe the proposed ASCA will help protect the character and appearance of Swale's historic high streets? Yes, subject to our previous response.	enforcement are recognised. Temporary community advertisements will not be unintentionally restricted. (Detailed response included at the end of this report)	

Appendix I DESIGNATING ASCA. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		Q7 Do you agree that additional advertisement controls are needed because several Conservation Areas are on Historic England's Heritage at Risk Register? Yes, but not only because of that. Q8 Do you think the proposed ASCA boundaries are drawn appropriately? It is not clear to us why you would not designate the whole conservation area, and indeed, all conservation areas. Would an advertisement which exceeds the proposed maximum dimensions be acceptable in, say, a front garden? Would residents away from the commercial areas object to being in a ASCA? We doubt it. What would happen if a dwelling outside the ASCA had a change of use to include commercial? Would the ASCA boundary be revised? Q9 Do you support the Council's reasoning for not extending the ASCA to the entire borough or to all Conservation Areas? We agree that designating the whole borough is not the best approach, but for the reasons above, would prefer the ASCA boundaries to match the CA boundaries. Q10 How do you think the ASCA might affect local businesses, positively or negatively? On the positive side, preserving the historic character of a commercial area should attract footfall if all owners/occupants comply. It's not clear whether existing signage which currently does not meet the proposed rules will be subject to enforcement and		

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		with what timescale for compliance. Money spent on changing signage might actually be better spent on the general repairs necessary to lift these areas into a lower heritage at risk category. A heavy-handed approach to enforcement might be counter-productive. Your Example 5 is encouraging. We would not wish to see rules imposed that proscribe temporary advertisements for village fairs, open gardens and the like. Q11 Do you feel the balance between protecting heritage and supporting commercial activity has been struck appropriately? If you accept our comments on Q5 and Q10, then we can't see any reason why businesses would be disadvantaged by having to comply with ASCA rules, other than the initial cost and perhaps ongoing maintenance for less durable but more appropriate materials. Q12 Are there specific types of advertisements you believe should be more tightly controlled within historic areas? See our response to Q5. Area-Specific Questions We have nothing to add on the specifics of each area. Q21 How important is the preservation of traditional shopfronts to you?		

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Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		Very important. Typically, they are fundamental to the character of a conservation area. Q22 Have you observed examples of inappropriate or harmful advertising in any of the proposed areas? Shopfronts put up by national chains are typically the most likely to harm the character of a historic environment. Q23 Do you think the proposed controls (e.g., 0.3m lettering, 3.6m height limit, 10% frontage) are reasonable? As mentioned above, 300mm might be too restrictive. We are also unconvinced about the need for a height limit. Here is another example from York, albeit on a building big enough to take it, which is not objectionable. On the other hand, 10% sounds like quite a lot. Doubtless you will be able to test what that might look like. 		

Appendix I DESIGNATING ASCA. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		Q24 Would you support increased enforcement against unauthorised advertisements? Yes, of course. We trust these responses help you in coming to a conclusion on these ASCAs - both their extent and the conditions that would apply.		

Summary of the Council's Response to Item no 15

Why an ASCA is being proposed

An ASCA does not ban advertising or prevent businesses from having signs. It simply places stricter limits on very large, brightly lit, or visually intrusive advertisements in Conservation Areas. These controls are already used in many historic towns across the country.

The aim is to:

- protect the character of historic areas
- reduce visual clutter
- support a more attractive and welcoming High Street
- give the Council clearer powers to deal with harmful signage

These measures sit alongside wider regeneration work—not instead of it.

Response to the concerns

Appendix I DESIGNATING ASCA. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
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1. Local challenges in Milton Regis

We recognise the real issues affecting Milton Regis, including antisocial behaviour, and building condition.

However, the fact that the area faces challenges does not mean its historic character is unimportant. Improving the appearance of the High Street is part of helping the area recover, not a distraction from it.

2. Impact on businesses

The ASCA does **not** stop businesses from advertising. Reasonable, well-designed signage will continue to be allowed.

The controls focus on:

- very large signs
- oversized lettering
- brightly illuminated or moving digital screens
- signage that covers most of a shopfront

Evidence from other towns shows that high-quality, consistent signage actually helps businesses by improving the look and feel of the High Street and encouraging footfall.

3. Regeneration and investment

We agree that Milton Regis needs investment in public spaces, safety, and business support.

The ASCA is one tool among many. It helps ensure that improvements to the High Street are not undermined by poor-quality or visually harmful signage.

4. Risk of decline

There is no evidence that limiting oversized or intrusive signage harms business activity. In fact, cluttered or inconsistent signage can make an area feel neglected and discourage visitors.

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Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
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A cleaner, more attractive streetscape supports:

- confidence in the area
- investment
- business viability
- community pride

5. Alternative suggestions

Your suggestions—such as grants, shopfront improvements, and voluntary guidelines—are helpful and align with the Council’s wider regeneration work. These approaches can sit alongside ASCA designation rather than replace it.

Overall position

After reviewing the objection, the Council considers that:

- ASCA designation is proportionate and justified
- It will not prevent businesses from advertising
- It will help improve the appearance and confidence of the High Street
- It supports, rather than conflicts with, regeneration efforts

For these reasons, the Council is recommending no change to the proposed ASCA for Milton Regis. (See response to Consultation Item 19, wherein, it is recommended to extend ASCA designation to cover the entire Milton Regis Conservation Area)

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Officer Response to CPRE Kent (Historic Buildings Committee) – Item 19 of Consultation response table

1. Overview of Representation

CPRE Kent submitted a detailed response supporting the principle of introducing ASCAs within Swale’s historic commercial centres. Their representation emphasises the importance of preserving the character of Conservation Areas and designated landscapes, while also highlighting the need for flexibility in applying advertisement controls. Key points raised include:

- Support for ASCA designation within the eight Conservation Areas with commercial centres.
- Agreement that additional controls within the Kent Downs National Landscape are unnecessary due to existing protections.
- Concern that ASCA boundaries do not align with full Conservation Area boundaries, with questions about consistency, future changes of use, and resident expectations.
- Reservations about the rigidity of proposed dimensional limits (300mm lettering, 3.6m height, 10% frontage), arguing that contextual appropriateness and materials are more important than fixed measurements.
- Emphasis on the potential harm caused by modern, reflective materials and standardised national chain branding.
- Support for proportionate enforcement and a request that temporary community advertisements (e.g., village fairs, open gardens) are not inadvertently restricted.
- Strong support for the preservation of traditional shopfronts.

These points are supported by direct statements in the representation, including:

“We would suggest the proposed controls are too rigid... What matters is whether the proposed signage is appropriate in the location.”

“It is not clear to us why you would not designate the whole conservation area...”

2. Officer Assessment

2.1 Support for ASCA Designation

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The Council welcomes CPRE Kent's support for the introduction of ASCAs in the eight Conservation Areas with commercial centres. Their endorsement reinforces the view that additional advertisement controls can play a meaningful role in enhancing the character and appearance of historic high streets and addressing issues identified in areas on the Heritage at Risk Register.

2.2 ASCA Boundaries and the Case for Full Conservation Area Coverage

CPRE Kent questions why the proposed ASCA boundaries do not extend to the full extent of each Conservation Area. This issue has also been raised in other representations, particularly in Cellar Hill & Greenstreet, Milton Regis, Newington High Street, and Queenborough.

The Council's initial approach focused on commercial frontages where advertisement pressure is greatest. However, the representation highlights several important considerations:

- Potential inconsistencies if commercial uses emerge outside the ASCA boundary.
- The likelihood that residents would not object to inclusion within an ASCA.
- The risk of creating a two-tier system of control within a single Conservation Area.

Given these points, the Council considers it appropriate to extend the ASCA designation to cover the *entire* Conservation Area in the four locations listed above. Including the full Conservation Area ensures that character sensitivity, existing advertisement patterns and the benefits of a consistent and easily understood approach are fully addressed.

2.3 Dimensional Controls and Flexibility

CPRE Kent expresses concern that the proposed dimensional limits may be overly rigid. Their examples illustrate that:

- Larger lettering or logos may be acceptable where proportionate to the host building.
- Materials and design quality often have a greater impact on character than size alone.
- Strict numerical limits may inadvertently permit harmful modern materials while restricting appropriate traditional signage.

The Council recognises the importance of providing clarity for applicants and enforcement teams, but also acknowledges the need for design-led judgement. As a result, the dimensional standards will be reviewed to ensure they:

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- Provide clear expectations;
- Allow flexibility where justified by context;
- Support high-quality, traditional, and proportionate signage.

2.4 Materials, National Chain Branding, and Visual Harm

The representation highlights the potential harm caused by bright plastics, reflective finishes, and standardised national chain branding. These concerns align closely with the Council's objectives. The ASCA guidance will therefore emphasise:

- The use of traditional or sympathetic materials;
- Avoidance of overly modern, glossy, or illuminated finishes;
- The need for national operators to adapt branding to historic contexts.

2.5 Enforcement and Temporary Community Advertising

CPRE Kent supports increased enforcement but cautions against a heavy-handed approach, particularly where existing signage may not comply with new standards. They also request that temporary community advertisements remain permissible.

The Council agrees that:

- Enforcement should be proportionate and targeted at harmful displays;
- Transitional arrangements may be appropriate;
- Temporary community-based advertisements (e.g., village fairs, open gardens) should not be unintentionally restricted.

These principles will be reflected in the final ASCA guidance and enforcement approach.

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3. Conclusion

CPRE Kent's representation provides constructive and well-reasoned feedback that aligns with the Council's aims of protecting historic character while supporting viable commercial activity. Their comments on boundary alignment, flexibility in dimensional controls, material quality and proportionate enforcement will inform the refinement of the ASCA proposals.

In light of the issues raised, the Council considers it appropriate to extend the ASCA designation to cover the *entire* Conservation Areas at Cellar Hill & Greenstreet, Milton Regis, Newington High Street and Queenborough. Extending the designation across the full Conservation Area in these locations ensures that character sensitivity, existing advertisement patterns and the benefits of a consistent and easily understood approach are fully addressed.