

To be Retained by BSGA

**Consultation Period:** None **To:**  
**Development Plan:** Local Plan Part 2 – Approved Modifications and Adoption (proposed for 16/1/20)  
**District:** Hillingdon LBC  
**Relevant Policies:** DMHB12, DMHB13 & Appendix B (new Policy DMBH 13A)  
**Or Narrative (refs):** Paras 5.51- 5.53 & (in Appendix B) B1.9 - B1.14

**Background:** The Part 1 of this Local Plan (effectively the Core Strategy) was adopted in 2012. Part 2 adds meat to the bones. We made many objections to the first draft of this policy document in September 2014. A revised Submission Draft was produced in October 2015. The advice on Shopfronts and Advertisements remained completely muddled (and muddle-headed). Some of the most objectionable elements were moved or removed. The advice on advertisements appeared in two separate policies and that on shopfronts was split between one policy and mostly moved to an Appendix (which, confusingly, also contains advice on advertisements). The Plan was submitted for consideration at Inquiry with some Council-proposed Modifications. The policy on advertisements was extracted from DMHB12 & 13 and combined into a new single Policy DMBH X (to be numbered on finalisation). But Appendix B was retained unaltered.

The revisions remained unacceptable in several aspects. Shop signs were to be restricted to the fascia area, plus one projecting sign. Only the shop name would be permitted. Flashing lighting and internally illuminated “box lights” would not be permitted. Appendix B is simply full of the usual prejudices - no high-level signs and internally illuminated “box” signs in sensitive areas: corporate signs to be altered etc. We again objected to this dreadful policy document by means of a written statement to the Inquiry.

As a result, the Inspector produced a number of proposed Main Modifications (and the Council – incompetently as usual -some Minor Modifications). Advice on advert control is now within one policy (DMHB 13A). And, although the detailed Appendix is retained, it has been modified somewhat: corporate signs “may” need to be altered and “indirect” illumination is “preferred”, ie internally illuminated signs are not automatically unacceptable.

Most of the Inspector’s proposed Main Modifications were acceptable. But some minor changes were requested. We suggested that:

- adverts must not be required solely to “enhance” heritage assets – “preserve” is also acceptable;
- adverts do not need to be restricted to fascia and one projecting sign;
- adverts should not be restricted to the shop name;
- the ban on internally illuminated “box lights” should be removed especially as it was now inconsistent with the advice in Appendix B.

We know that our representations were received: but the Inspector has entirely ignored them. As a consequence, the silly restrictions above remain. Some of these are unlawful and some are inconsistent with the rubbish in Appendix B. Some are simply wrong (there is advice to have regard to a Part C which does not exist!).

**Comment:** How the Council will apply this inconsistent and partly unlawful policy remains to be seen. I knew a planning enforcement officer (now retired) at Hillingdon who told me that the Council are so overburdened with planning work generally that simple matters (like advertisements other than poster panels) generally go through on the nod. Let us hope that this continues, and the policy disappears into virtual obscurity. Can you imagine any overworked planning officer being likely to object to “WH Smith Est 1792” simply on the grounds that “Est 1792” is extra to the shop name?

Date sent to Council/Inspector:

No further representations permitted

**Development Plan Monitoring**