



To be Retained by BSGA

Consultation Period: 27/4/19 **To:** 8/5/19
Development Plan: Local Plan Part 2 – Post Inquiry Proposed Modifications
District: Hillingdon LBC
Relevant Policies: DMHB12, DMHB13 & Appendix B (new Policy DMBH 13A)
Or Narrative (refs): Paras 5.48, 5.53 & (in Appendix B) B1.9 - B1.14 – unnumbered paragraphs in proposed replacement draft policy and text

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 has 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), although the detailed Appendix is to be retained. Most of the Inspector’s Main Modifications are acceptable. But some minor changes are required (eg adverts must not be required solely to “enhance” heritage assets – “preserve” is also acceptable). The policy banning internally illuminated signs is proposed to be retained; but it is now inconsistent with other parts of the policy and the proposed changes to Appendix B suggested by the Council.

One of the Council’s Minor Modifications at least now alters the text of the Appendix to state that corporate signs “may” have to be altered on and in historic buildings/areas (rather than “will” have to be altered).

Comment: We have made further representations to the Inspector, pointing out that some of his proposed changes are unlawful, unsound and inconsistent. Unfortunately, it is clear that the Inspector has little (if any) knowledge of advertisement control.

Date sent to 3/4/19
Council/Inspector:

Development Plan Monitoring