

**To be Retained by BSGA**



**Consultation Period:** 22/1/19 **To:** 17/5/19  
**Development Plan:** New Southwark Plan - Proposed Submission Version – Revised Version  
**District:** Southwark LBC  
**Relevant Policies:** P34 & P40 (previously DM31 & DM36)  
**Or Narrative (refs):** Supporting "Reasons"

**Background:** This replacement for the Council's old UDP incorporates work already done on the now abandoned Core Strategy. P34 concerns shopfronts and signage; P40 concerns signage and advertisements. We objected, in November 2014, to much of policy P40 (previously DM48 and then DM36) at the "Options" version of this plan. It stated that adverts must avoid harm to heritage assets and their settings; be designed (size, scale, type, illumination) to be appropriate to the site and surroundings; not harm public safety and not cause light pollution.

The second part of the policy was wholly unacceptable. Illumination was not to be permitted in conservation areas or on or near designated heritage assets. And adverts must not harm trees. The rest of the policy strictly concerned shrouds and hoardings and effectively poorly repeated the first half of the policy (as if shrouds and hoardings were somehow totally different advertisements from any other types).

The Council redrafted the Preferred Options version of the plan. Policy P40 (DM36) was totally redrafted. It stated little more than that adverts must avoid harm to public safety; should be designed so that their size, scale, type and illumination are unobtrusive, taking into account site context and local character; avoid harm to the significance of heritage assets (listed buildings, conservation areas) or their settings; and do not adversely impact on the streetscape or trees.

The second part of the policy was deleted entirely. No doubt for PC reasons, the policy also now states that adverts should "encourage healthy behaviours".

Policy DM31 stated only that shopfronts and signs must ensure that the proportion, scale, style, detailing, colour and materials make a positive contribution to the host building and its context; and is adequately lit for its context.

We did not bother to object to the silliness of the reference to trees; and most of the rest was acceptable. Basically, both policies said no more than that any advertisement should be appropriate to its site and surroundings, which is all down to subjective consideration on merit.

We did object to "encouraging healthy behaviours". This is a policy which seeks to control the content of an advertisement (it might suggest that the Council can refuse to consent to a sign - perhaps for a fizzy soda drink - on the basis that it might encourage consumption of excessive sugar).

The Council have now produced yet another amended version of the Submission Draft. But it proposes no changes to the previous draft and still contains the objectionable reference to unhealthy behaviours.

**Comment:** This version of the plan is proposed to be the final version to be submitted for examination. As it proposes no changes to the sections to which we have objected, it is unnecessary to repeat our earlier objection – it stands and will be submitted with the rest of the documents for examination.

**Date sent to Council:** Existing representations will stand. No further objection required at this stage.

**Development Plan Monitoring**