

To be Retained by BSGA



**Consultation Period:** 10/1/22 28/2/22

**To:**

**Development Plan:** Local Plan 2023-2038 – Publication Draft

**District:** Wandsworth LBC

**Relevant Policies:** LP9

**Or Narrative (refs):** Paras 14.54-14.58

**Background:** This document will replace the development control policies in Wandsworth’s existing LDF Development Management Policies DPD. The old advertisement control policy (DMS8) was simple, stating only that consent would not be granted for advertisements which harm visual or aural amenity or public safety. The supporting text was equally straightforward, referring to PPG19 and Circular 03/2007 (both now cancelled).

The new draft policy LP9 is far more detailed. The first draft stated that all advertisements should be of high quality appearance; well-integrated into their context, especially in relation to listed buildings and conservation areas; not create clutter; avoid excessive illumination and light pollution; and avoid harm to public safety. Crucially, it stated that internally illuminated signs would not normally be permitted within conservation areas or on listed buildings.

The supporting text was wordy without adding anything worth saying, apart from acknowledging that advertisements “are important to commercial areas”.

This revised draft has removed the advice on internally illuminated signs from the policy itself. But the Council have “craftily” removed it to the supporting text (para 14.58). But they have also redrafted it to say that internally illuminated signs will not be permitted in conservation areas or on listed buildings “unless it is demonstrated to the satisfaction of the Council that the design complements the character of the conservation area and/or does not harm the significance of the listed building”. To this extent, our objection has succeeded in watering down the weight of the advice.

**Comment:** It is impossible to object to the advice on internal illumination as it has been re-drafted. It is a statutory requirement that any development (including advertisements) must not harm conservation areas or listed buildings; and it follows that the Council must be “satisfied” that any proposed advertisement complies with this statutory requirement. Whilst the wording appears hostile, in essence it only requires what the law requires.

**Date sent to Council:** No further representations required

**Development Plan Monitoring**