



**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
TOWN AND COUNTRY PLANNING (CONTROL OF ADVERTISEMENTS) (ENGLAND)
REGULATIONS 2007**

ADVERTISEMENT CONSENT APPEAL BY MR. A. KHAN

**AGAINST THE REFUSAL ISSUED BY HILLINGDON BOROUGH COUNCIL
IN RESPECT OF LAND AT:**

39 STATION ROAD, WEST DRAYTON, HILLINGDON, UB7 7LN

INSTALLATION OF 2 NO. EXTERNALLY ILLUMINATED FASCIA SIGNS

**WRITTEN REPRESENTATIONS SUBMITTED
ON BEHALF OF THE APPELLANT**

JANUARY 2026

PLANNING INSPECTORATE: TBC

LOCAL AUTHORITY REF: 24730/ADV/2025/42

OUR REF: 25/989

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Executive Summary of Grounds of Appeal

This appeal challenges the London Borough of Hillingdon's refusal of advertisement consent for two externally illuminated fascia signs at 39 Station Road, West Drayton. The refusal is procedurally flawed, inconsistent with policy, and unsupported by evidence. The appellant respectfully submits that the appeal should be allowed for the following reasons:

Procedural Fairness

- The Council misdescribed the proposal, assessing internally illuminated signage that was never applied for.
- The decision was made on superseded plans, contrary to Regulation 3(1) of the Advertisement Regulations 2007.
- These errors amount to a breach of natural justice and undermine the validity of the refusal.

Amenity

- The proposed signage is modest, proportionate, and of higher design quality than many existing examples.
- Warm halo illumination (2700K–3000K) is demonstrably less intrusive than neighbouring internally lit box signs.
- Refusal perpetuates a blank, inactive frontage, which itself harms amenity. The proposal would positively enhance the street scene.

Public Safety

- Rear halo illumination avoids glare, flicker, or distraction, ensuring no risk to drivers or pedestrians.
- Clear, legible signage aids wayfinding in a busy mixed-use centre, particularly during evening hours, supporting public safety.

Policy Compliance

- The proposal accords fully with the statutory tests under the Advertisement Regulations 2007: amenity and public safety.

- It is consistent with the NPPF (2024, paras. 136–139), the London Plan (2021), and Hillingdon Local Plan policies DMHB 11, DMHB 13, and DMHB 13A.
- The refusal is inconsistent with approvals for larger, brighter signage in the immediate vicinity, undermining fairness and predictability.

Material Considerations

- Significant private investment will refurbish and reopen a long-vacant unit, supporting local employment and the night-time economy.
- The signage is integral to the commercial viability of the enterprise and contributes to the vitality of West Drayton's high street.
- These benefits are material considerations under Section 70(2) of the Town and Country Planning Act 1990.

Executive Summary Conclusion:

The refusal is procedurally unsound, inconsistent with policy, and unsupported by evidence of harm. The proposed signage enhances amenity, safeguards public safety, and delivers clear economic and community benefits. The Inspector is respectfully invited to allow the appeal and grant consent.

1.0 Introduction

This combined Statement of Case, Design Note, Photographic Context Analysis and Site Description is submitted in support of an appeal against the London Borough of Hillingdon's refusal of advertisement consent for two externally illuminated fascia signs and vertical signage at 39 Station Road, West Drayton.

The proposal forms part of a wider investment to refurbish and reopen a long-vacant commercial unit (with an existing restaurant planning Use) as a high-quality restaurant. The signage is essential for legibility, commercial viability, and the successful activation of the frontage.

The Council's refusal is procedurally flawed, based on an incorrect description of development, an assessment of superseded plans, and, assertions of harm that are not supported by evidence.

When assessed correctly, the proposal accords fully with the **Town and Country Planning (Control of Advertisements) Regulations 2007**, the **NPPF (2024)**, the **London Plan (2021)** and the **Hillingdon Local Plan**.

The appellant respectfully requests that the appeal be allowed.

2.0 Procedural Matters

2.1 Incorrect Description of Development

The Refusal Notice describes the proposal as:

“Installation of 2 no. internally illuminated fascia signs and vertical light strips.”

This is factually incorrect. The application form and the Council's own registration letter of the 6 October 2025, describe the proposal as:

“Installation of 2 no. externally illuminated fascia signs.”

There is no internal illumination, and the amended plans removed the vertical light strips entirely. The Council assessed a different and more harmful form of development than that proposed.

This is a material procedural error.

2.2 Failure to Consider Amended Plans

Due to concerns raised by the planning officer in email correspondence, the applicants duly considered the councils concerns and in order to progress the application and allow the business to properly open and operate, revised drawing **25/989/11B** was submitted on 3 December 2025, removing:

- Vertical LED light strips
- Illumination to the upper fascia sign

The officer report which supports the councils refusal Notice, refers only to drawing 11A, which was superseded. The decision was therefore made on incorrect and outdated plans, contrary to:

- Regulation 3(1) of the Advertisement Regulations 2007
- NPPF (2024) paragraphs 43–46
- Principles of procedural fairness

The Inspectorate has consistently held that decisions based on misdescribed or superseded proposals are procedurally unsound and cannot be relied upon. The appellant is entitled to a fair determination of the actual proposal submitted

This failure undermines the validity of the decision and demonstrates a disregard for procedural fairness, contrary to established principles of administrative law.

3.0 The Statutory Framework

Under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007, the statutory tests for advertisement consent are deliberately narrow. Decisions must be made only in the interests of:

1. **Amenity** – the effect of the advertisement on the visual appearance of the building or locality, including considerations of scale, design, materials, and cumulative impact.
2. **Public Safety** – whether the advertisement would endanger users of highways, footpaths, or other public spaces, for example by obstructing sightlines, causing glare, or creating distraction.

No other planning considerations are relevant under the Regulations. Matters such as competition, commercial preference, or subjective taste are explicitly outside the scope of the statutory framework.

The National Planning Policy Framework (NPPF, 2024) reinforces this position at paragraphs 136–139. It confirms that advertisements should be subject to control only where necessary, and that local planning authorities should adopt a positive and proportionate approach to well-designed commercial signage. The NPPF emphasises that signage plays a vital role in supporting business vitality, legibility, and the night-time economy, and should not be unduly restricted where it causes no demonstrable harm.

In this case, the Council has not identified, let alone evidenced, any harm to either amenity or public safety. The refusal relies on assertions rather than substantiated impacts. The proposed signage is modest in scale, uses high-quality materials, and employs subtle illumination that is demonstrably less intrusive than many existing examples in the locality. There is no evidence of visual harm to the street scene, nor of any risk to highway safety or pedestrian movement.

Accordingly, the statutory tests are not met. The refusal is inconsistent with both the Advertisement Regulations 2007 and the NPPF (2024), which together require that consent should be granted unless clear, evidence-based harm to amenity or public safety can be shown.

4.0 The Appeal Site and Surrounding Area

The appeal site is located at 39 Station Road, West Drayton, within the central commercial spine of the settlement.

Station Road functions as one of West Drayton's principal mixed-use corridors, accommodating a broad range of retail, service, and hospitality uses that collectively form a vibrant and active high street environment.

The site sits on the western side of Station Road, within a continuous run of ground-floor commercial units with residential accommodation above.

4.1 The Surrounding Area

The appeal site is positioned within the heart of a well-established commercial high street that serves as one of the primary retail and service centres for the local community.

Station Road forms a key north–south route through West Drayton and accommodates a diverse mix of retail, hospitality, and service-based uses, creating a vibrant and active urban environment throughout the day and into the evening.

The application property occupies the ground and first floors of a two-storey building, with commercial use at street level and first floor level, an arrangement typical of the wider street.

The unit has been vacant for a prolonged period, resulting in an inactive and shuttered frontage that currently detracts from the visual continuity and commercial vitality of the high street.

The building itself is of modest scale, with a traditional shopfront arrangement and a clearly defined fascia zone consistent with neighbouring premises.

The immediate area is characterised by a continuous run of commercial units, including restaurants, takeaways, convenience stores, estate agents, barbers, and small independent retailers. These premises display a wide variety of signage types, including:

- Large fascia panels spanning the full width of shopfronts
- Internally illuminated box signs
- Externally illuminated fascias

- Halo-lit lettering
- Projecting signs
- Bold colour palettes and branded shopfronts

This diversity of signage contributes to a visually dynamic and commercially expressive environment typical of a busy suburban high street.

To the north and south, Station Road continues with a similar pattern of mixed-use development, with commercial activity at ground and first floor levels together with some residential uses above.

The street benefits from high pedestrian footfall, supported by nearby bus stops, local services, and proximity to West Drayton Station, which lies within walking distance and contributes to the area's strong connectivity.

The site sits within an area of high commercial activity, with many businesses operating into the evening. As such, illuminated signage is a common and expected feature of the street scene, contributing to legibility, safety, and the night-time economy.

Several nearby premises—including the adjacent Kearns unit—display signage that is larger, more prominent, or more brightly illuminated than the appeal proposal.

The surrounding built form is varied in age and architectural style, reflecting incremental development over time. Materials include brick, render, aluminium shopfronts, composite cladding, and a range of signage finishes. This variety creates a flexible visual context in which well-designed contemporary signage can be comfortably accommodated.

Overall, the site is located within a busy, mixed-use commercial centre where signage plays a key role in defining the character of the street, supporting business visibility, and contributing to the vibrancy of the local economy.

The proposed signage at No. 39 is therefore entirely consistent with this context and represents a high-quality enhancement to a currently inactive frontage.

4.2 Surrounding Commercial Context

Station Road contains a diverse mix of commercial uses, including:

- Restaurants and takeaways

- Convenience stores
- Estate agents
- Barbers and salons
- Independent retailers
- Service-based businesses

Immediately adjacent to the site is the Kearns premises, which displays a larger fascia sign than the appeal proposal. Other nearby occupiers include brightly coloured convenience stores, internally illuminated takeaways, halo-lit cafés, and projecting signs.

4.3 Urban Grain, Building Heights and Street Width

Station Road exhibits a fine urban grain, with narrow plot widths and a consistent rhythm of shopfronts. Buildings are typically two to three storeys in height. The street is of moderate width, accommodating:

- Two-way traffic
- On-street parking
- Wide pedestrian footways
- Bus stops

This width allows clear visibility of fascia signage from both near and medium distances.

4.4 Transport Accessibility (PTAL)

The site benefits from good public transport accessibility, typically PTAL 3–4, supported by:

- West Drayton Station (Elizabeth Line) within walking distance
- Multiple bus routes
- Strong pedestrian connectivity

This contributes to high footfall and reinforces the importance of clear commercial signage.

4.5 Heritage Context

The site is not within a conservation area, nor is the building listed. There are no designated heritage assets nearby. The surrounding built form is predominantly late-20th-century commercial development, providing flexibility for contemporary signage.

4.6 Night-Time Economy

Station Road supports a strong evening economy. Illuminated signage is commonplace and contributes to:

- Legibility
- Safety
- Commercial visibility

The proposed warm-tone rear illumination is significantly more subtle than many existing examples.

4.7 Summary

The site is located within a busy, mixed-use commercial centre where signage is an essential component of the visual environment. The proposed signage is entirely appropriate, proportionate and consistent with the established character of the area.

5.0 Design Note

5.1 Overview of the Proposed Signage

The proposal comprises:

- Two main fascia signs, one at ground-floor level and one at building eaves level
- Rear-illuminated gloss-gold lettering (warm LED 2700K–3000K)
- Dark green RAL 6005 aluminium fascia panel
- Matching rear-illuminated logo
- Lettering sizes:
 - “RAAVI SPICE” – approx. 40 cm
 - “RIVER OF FLAVOURS” – approx. 15 cm
- Fascia panel approx. W 500 cm x H 100 cm
- Matching vertical panels to tie the two main signs together

The design is refined, contemporary and proportionate.

5.2 Illumination Strategy

- Rear-facing only (halo effect)
- Warm-tone LED (2700K–3000K)
- No forward projection
- No internal illumination
- No flashing or movement

This is one of the least intrusive forms of illumination available.

5.3 Materials and Colour Palette

- Refined gloss-gold lettering and logo
- Dark green aluminium fascia
- Warm LED rear illumination
- Existing wall finishes retained

The palette is elegant, high-quality and appropriate for a high-quality restaurant.

5.4 Relationship to the Host Building

The signage:

- Aligns with existing architectural proportions
- Avoids clutter
- Enhances the refurbished frontage
- Does not obscure architectural features
- Provides legibility of the business accommodated over two floors

The proposal improves and enhances the appearance of the building.

5.5 Amendments in Drawing 11B

The amended drawing:

- Removed vertical light strips
- Removed illumination to the upper sign
- Reduced overall lighting impact
- Responded directly to officer feedback

These changes further reduce any perceived impact.

6.0 Photographic Context Analysis

6.1 Immediate Setting

Application Property The existing frontage is blank and inactive. The proposed signage will activate and enhance the frontage.



Appeal property with temporary canvas sign affixed to premises

6.2 Adjacent Premises

Kearns (Next Door) Displays a **larger fascia sign** than the proposal which projects lower than the appeal signage presenting a similar if not larger existing sign. This establishes a clear precedent.



6.3 High Street Character

Within 50m The street contains:

- Larger fascia panels
- Bold colours
- Internally illuminated signs
- Projecting signs

The proposal is more restrained than many existing examples shown below.









6.4 Fascia Scale

Photo 5 Typical fascia depths: 80–120 cm. Proposed fascia: 100 cm — comfortably within the norm.



6.5 Illumination in Context

Illuminated signage is widespread. Evening views show illumination is expected and contributes to commercial vibrancy. The proposal uses subtle rear illumination, less intrusive than many examples.

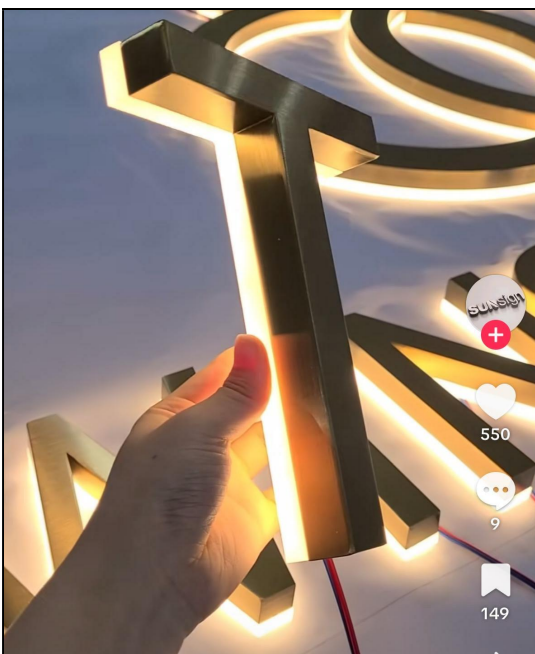






6.6 Materials and Colour Palette

It has been shown the previous photographs that the local street includes aluminium, acrylic, vinyl, timber and composite fascias. The proposed dark green and gold palette with rear facing 'halo' lighting is refined, less obtrusive and more compatible than many of the examples shown.



7.0 Visual Context Analysis

The photographic evidence above provides a clear and objective demonstration of the visual character of Station Road and the relationship of the proposed signage to its surroundings. The following expanded analysis sets out the key findings.

7.1 Immediate Setting and Existing Frontage

Application Property (Front Elevation) The existing frontage at 39 Station Road is visually inactive, lacking any signage, branding or architectural interest due to long-term vacancy.

This creates a noticeable gap in the otherwise continuous run of commercial frontages. The proposed signage will introduce a coherent, high-quality design that activates the frontage, improves legibility, and contributes positively to the vibrancy of the street.

The proposed fascia panel aligns with the established fascia zone of the building and neighbouring units, ensuring visual continuity.

7.2 Adjacent Premises and Direct Comparators

Adjacent Kearns Premises The neighbouring Kearns unit displays a larger fascia sign than that proposed at No. 39. Its scale, depth and prominence exceed those of the appeal proposal. This is a critical comparator because:

- It demonstrates that signage of this scale is already characteristic of the immediate context.
- It confirms that the proposed signage is not excessive in relation to neighbouring examples.
- It shows that the Council has previously accepted signage of greater visual impact in the same frontage.

The proposed signage is therefore entirely consistent with the established pattern of commercial branding.

7.3 Wider High Street Character

The existing Station Road high street contains a diverse mix of signage types, including:

- Internally illuminated box signs
- LED-lit lettering
- Bold colour palettes
- Projecting signs
- Large fascia panels spanning entire shopfronts

This demonstrates that Station Road is a visually dynamic commercial environment, where signage plays a prominent role in defining the character of the street. The proposed signage is more restrained than many existing examples.

7.4 Fascia Scale, Rhythm and Proportion

Fascia Heights and Shopfront Rhythm The typical fascia height along Station Road ranges from approximately 80 cm to 120 cm. The proposed fascia height of 100 cm sits comfortably within this established range. The signage respects the horizontal rhythm of the street and aligns with the architectural proportions of the host building.

The lettering sizes (40 cm and 15 cm) are proportionate to the fascia depth and do not appear oversized or visually dominant.

7.5 Illumination in the Street Scene

Examples of Illuminated Signage Illumination is a common feature of Station Road, particularly among restaurants, takeaways and convenience stores. Existing examples include:

- Internally illuminated box signs
- Bright LED strip lighting
- Halo-lit lettering
- Illuminated projecting signs

In comparison, the proposed signage uses warm-tone rear illumination only, producing a subtle halo effect that is significantly less intrusive than many existing illuminated signs.

Rear halo lighting avoids glare, flicker, or distraction. Unlike forward-projecting or internally lit signs, it does not impair driver visibility.

Therefore, the subtle halo effect provides legibility without glare, ensuring that public safety is preserved in accordance with Regulation 3.

7.6 Evening Character and Night-Time Economy

Evening Views of Station Road Evening photographs show that illumination contributes positively to the night-time character of the high street. The proposed warm-tone lighting (2700K–3000K) is softer and more sympathetic than the cooler, brighter lighting used elsewhere.

The signage will support the night-time economy by providing clear, legible branding without causing glare or visual clutter.

7.7 Materials and Colour Palette in Context

Existing Shopfront Materials The street scene includes a wide variety of materials, including:

- Aluminium panels
- Acrylic lettering
- Vinyl graphics
- Timber fascias
- Composite cladding

The proposed dark green RAL 6005 fascia and gloss-gold lettering provide a refined, high-quality appearance that elevates the frontage while remaining compatible with the varied material palette of the street.

7.8 Summary of Photographic Findings

The photographic evidence demonstrates that:

- The proposed signage is modest relative to neighbouring examples.
- The rear illumination is subtle and appropriate for the commercial context.
- The design is high-quality, coherent and enhances the refurbished shopfront.
- The signage is less visually prominent than several existing signs in the immediate vicinity.
- The proposal respects and reflects the established character of Station Road.
-

There is no harm to amenity or public safety.

Clear signage supports wayfinding for pedestrians and visitors, particularly during evening hours, thereby contributing positively to public safety.

8.0 Policy Compliance

The proposal accords with all relevant national, regional and local planning policies. The following expanded assessment demonstrates full compliance.

8.1 Hillingdon Local Plan Part 1 – Policy BE1

Policy BE1 requires development to improve the quality of the built environment. The proposal:

- Enhances a previously vacant frontage
- Introduces high-quality materials and refined design
- Supports the vitality and viability of the high street
- Reinforces the commercial character of Station Road

The signage clearly improves, rather than harms, the built environment.

8.2 Hillingdon Local Plan Part 2 – Policy DMHB 11 (Design)

DMHB 11 requires development to respect local character. The signage:

- Is proportionate to the host building
- Aligns with the established fascia zone
- Uses high-quality materials
- Reflects the commercial context

There is no conflict with DMHB 11.

8.3 Policy DMHB 13 (Shopfronts)

DMHB 13 supports well-designed shopfronts that contribute positively to the street scene. The proposal:

- Provides clear, legible branding
- Enhances the refurbished shopfront
- Improves the appearance of the building
- Reinforces the commercial identity of the unit

The signage fully complies with DMHB 13.

8.4 Policy DMHB 13A (Advertisements)

DMHB 13A requires advertisements to be appropriate in scale, appearance and illumination. The proposal:

- Is externally illuminated only
- Uses warm-tone, low-intensity lighting
- Is smaller than several nearby examples
- Does not create clutter or visual dominance

The signage is entirely appropriate for its context.

8.5 London Plan Policy D3 (Design-Led Approach)

Policy D3 requires development to respond positively to local character. The signage:

- Reflects the commercial nature of Station Road
- Enhances the appearance of the building
- Uses materials and illumination appropriate to the setting

The Council has not demonstrated any conflict with D3.

8.6 NPPF (2024) – Paragraphs 136–139

The NPPF confirms that advertisements should be assessed **only** in terms of:

- **Amenity**, and
- **Public safety**

The proposal:

- Causes no harm to amenity
- Causes no harm to public safety
- Enhances the appearance of the frontage
- Supports economic activity

The refusal is therefore inconsistent with national policy.

9.0 Material Considerations

In determining applications, Section 70(2) of the Town and Country Planning Act 1990 requires decision-makers to have regard not only to the development plan but also to any other material considerations. In this case, several important factors were overlooked or given insufficient weight by the Council.

9.1 Significant Investment and Refurbishment

The proposal forms part of a substantial investment to refurbish and bring back into active use a long-vacant commercial unit. Vacant premises detract from the vitality and appearance of the high street, undermining both amenity and economic resilience. The refurbishment represents a tangible commitment to regeneration, improving the built environment and contributing to the attractiveness of West Drayton's commercial centre.

9.2 Economic and Employment Benefits

The reopening of the unit as a high-quality restaurant will generate direct employment opportunities and indirect economic benefits through increased footfall, linked spending, and support for the evening economy. National policy (NPPF 2024, paras. 82–84) places strong emphasis on supporting economic growth and productivity, recognising the role of small businesses in sustaining local communities. These benefits are material considerations that weigh significantly in favour of the proposal.

9.3 Need for Clear and Legible Signage

Commercial viability in a busy mixed-use centre depends on visibility and legibility. Well-designed signage is essential to attract customers, aid wayfinding, and ensure that businesses can compete effectively. The proposed signage is modest, proportionate, and of high design quality, directly supporting the viability of the refurbished unit. Without appropriate signage, the investment risks being undermined, which is contrary to the positive approach to economic activity advocated by the NPPF.

9.4 Applicant's Proactive Engagement

The applicant has engaged constructively with the planning process, submitting amended drawings to address officer concerns and removing elements considered more intrusive. This demonstrates a willingness to collaborate and refine the scheme in line with feedback. Such proactive

engagement is a material consideration, reflecting good practice and aligning with the Government's objective of a positive, plan-led system.

9.5 Public Interest and High Street Vitality

The proposal serves the wider public interest by sustaining the vitality of West Drayton's high street. Active frontages, legible signage, and investment in high-quality businesses contribute to a vibrant and resilient local economy. The NPPF (2024) explicitly recognises the importance of town centres as social and economic hubs, and encourages local planning authorities to support proposals that enhance their viability and long-term sustainability.

9.6 Conclusion on Material Considerations

When properly assessed, the refurbishment of a vacant unit, the associated economic and employment benefits, the essential role of clear signage, and the applicant's proactive engagement all weigh strongly in favour of granting consent. These are material considerations under Section 70(2) of the 1990 Act and NPPF (2024) paras. 82–84, and they outweigh any alleged harm. The Council's failure to give them due weight represents a misapplication of policy and an incomplete assessment of the planning balance.

10.0 Further Considerations

10.1 Procedural Fairness and Natural Justice

The Council's refusal is procedurally unsound. By misdescribing the nature of the proposed development and assessing superseded plans, the authority failed to determine the actual application before it. This constitutes a breach of the principles of natural justice and undermines the validity of the decision.

The Planning Inspectorate has consistently held that decisions based on incorrect descriptions or outdated drawings are materially flawed and cannot be relied upon. The appellant is entitled to a fair determination of the proposal as submitted, not of a different scheme.

10.2 Consistency and Legitimate Expectation

The principle of consistency in decision-making requires local planning authorities to treat like cases alike unless material differences exist. Numerous nearby premises display signage of greater scale, brightness, or visual impact than the appeal proposal.

By refusing modest, externally illuminated fascia signs while permitting more prominent examples in the immediate vicinity, the Council has acted inconsistently and undermined legitimate expectations of fairness and predictability in the planning process.

10.3 Amenity Enhancement Through Active Frontage

The refusal perpetuates a long-vacant and inactive frontage, which itself detracts from the amenity of Station Road. National policy (NPPF 2024, paras. 82–84) emphasises the importance of supporting economic vitality and active frontages.

The proposed signage would not merely avoid harm but would actively enhance amenity by reintroducing legibility, coherence, and vibrancy to a currently blank elevation. This positive contribution has not been weighed in the Council's assessment.

10.4 Public Safety and Wayfinding

The illumination strategy with rear halo lighting and warm LED tones avoids glare, flicker, or distraction. Unlike internally illuminated box signs, the proposal does not impair driver visibility or pedestrian safety.

On the contrary, clear and legible signage assists wayfinding in a busy mixed-use centre, particularly during evening hours when footfall is high. The signage therefore contributes positively to public safety and legibility, consistent with the statutory tests under Regulation 3(1) of the 2007 Regulations.

10.5 Economic and Community Benefits

The refurbishment and reopening of a long-vacant unit will deliver significant investment, employment opportunities, and support for the local night-time economy. These are material considerations under Section 70(2) of the Town and Country Planning Act 1990.

The signage is integral to the commercial viability of the enterprise and its ability to contribute to the vitality of West Drayton's high street. The Council's failure to give weight to these benefits represents a misapplication of policy and a disregard of public interest.

10.6 Conclusion on Further Considerations

Taken together, these further considerations demonstrate that the refusal is procedurally flawed, inconsistent with established precedent, and contrary to both national and local policy objectives.

The proposal not only avoids harm to amenity and public safety but actively enhances the street scene, supports economic vitality, and delivers public benefits. The Inspector is respectfully invited to allow the appeal on these further grounds in addition to those already advanced.

11.0 Overall Conclusion

This combined Statement of Case, Design Note, Photographic Context Analysis and Site Description demonstrates that the proposed signage at 39 Station Road is:

- **High-quality** in design, materials and illumination
- **Modest and proportionate** in scale
- **Sensitive** to the character of the host building
- **Fully compatible** with the established commercial character of Station Road
- **Less visually intrusive** than several existing signs in the immediate vicinity
- **Supportive** of the economic viability of a new local business
- **Compliant** with all relevant national, regional and local planning policies

The Council's refusal is undermined by:

- A **procedurally incorrect description** of development
- An assessment based on **superseded plans**
- A failure to consider **material amendments**
- A lack of evidence demonstrating any harm to amenity or public safety
- A misapplication of local and national policy

When assessed correctly, the proposal clearly satisfies the statutory advertisement tests and delivers a positive enhancement to the street scene.

In light of the above, and having regard to the site's established use, significant investment, Policy context, and the clear public benefits of the scheme, the Inspector is respectfully invited to allow the appeal and grant planning permission for the proposed signage.

12.0 APPENDICES

12.1 APPENDIX A – COUNCIL PLANNING APPLICATION REGISTRATION LETTER



Mr Mark Shreves
69 Walter Road
Swansea
SA1 4QA

Your Ref:
Our Ref: **24730/ADV/2025/42**
Please ask for: Analese Haynes
Direct Dial: 01895 250230

6th October 2025

Dear Sir/Madam

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
THE TOWN AND COUNTRY PLANNING (CONTROL OF ADVERTISEMENTS) REGULATIONS 2007**

Location: 39 STATION ROAD WEST DRAYTON
Proposal: Installation of 2 no. externally illuminated fascia signs.

Thank you for your application which was accepted on 22nd September 2025 together with the fee of **£168.00** which is hereby acknowledged.

If by **17th November 2025** you have not been given notice by the Council of its decision you are entitled to appeal to the Secretary of State for the Environment, Transport and The Regions in accordance with Regulation 15 of the Town and Country Planning (Control of Advertisements) Regulations 1992 by notice served within 8 weeks from that date. You may, however, by agreement in writing with the Council extend the period within which the decision is to be given.

A copy of the documentation comprising of the application can be found on the Council's website www.hillingdon.gov.uk , to view the documentation click on the Quick Link to Planning and follow the instructions on screen.

Development Management
Directorate of Place
Hillingdon Council
3 North, Civic Centre, High Street, Uxbridge UB8 1UW
www.hillingdon.gov.uk

Yours faithfully,

A handwritten signature in black ink, appearing to read 'R Johnson'.

Roz Johnson
Head of Development Management and Building Control

12.2 APPENDIX B – EMAIL CORRESPONDENCE WITH COUNCILS PLANNING OFFICER

Re: 24730/ADV/2025/42 | 39 STATION ROAD

From: sgwplanning@aol.com (sgwplanning@aol.com)

To: ahaynes@hillingdon.gov.uk; planning@hillingdon.gov.uk

Bcc: letting.move@gmail.com; marky.khan1122@gmail.com

Date: Friday, 19 December 2025 at 11:52 GMT

Morning Analese,

I note from the Council's planning portal that a refusal has been issued for the above application, although I have not yet received the formal notification. This is disappointing given our previous correspondence and your indication that you would advise me of the decision prior to its formal issue.

I must also highlight that the Refusal Notice contains an incorrect description of the proposed development and does not reflect either the application form or the Council's registration letter dated 6 October 2025.

Your Refusal Notice describes the proposal as:

"Installation of 2no. **internally** illuminated fascia signs and vertical light strips."

However, both the application form and your registration letter of the 6th October 2025 describe the development as:

"Installation of 2no. **externally** illuminated fascia signs."

For clarity, the signage includes *no* internal illumination. All lighting is external and rearward-facing, which is fundamentally different from internal illumination that projects light forward. The description of development has therefore been altered without agreement from the applicants, and the Notice does not accurately represent the submitted scheme.

In addition, it appears that the amendments submitted via email on 3 December 2025—specifically the revised frontage drawing ref. 25/989/11B, which removed the vertical lighting and the illumination to the upper sign—have not been considered. Your report refers only to drawing "11A", which predates these amendments.

Your report also states:

"It should be noted that during the process of the application recommendations were made to the applicant in attempt to achieve an acceptable scheme, these suggestions were not accepted and the development has been decided in accordance with the original plans."

This statement is wholly inaccurate. Extensive discussions took place, and several amended drawings and layout revisions were submitted in an effort to reach a mutually acceptable solution, including those provided on 3 December 2025. To suggest that recommendations were not accepted is both incorrect and misleading.

As previously outlined, the applicants have made a significant investment in bringing a long-vacant property back into active use, enhancing the high street facilities on offer, creating employment, and providing a high-quality restaurant for the local community. The proposed signage is intended to reflect this investment, the high quality of the restaurant and support the viability of the business.

There are numerous examples of larger signs along the high street—both illuminated and non-illuminated—including the adjacent Kearns premises, whose signage is in fact larger than the proposed lower sign, albeit positioned slightly lower.

Given the above, I must formally request that the Council withdraw and correct the Refusal Notice on the grounds that:

1. The description of development has been altered without the applicants' agreement, contrary to established planning practice and procedural requirements.
2. The decision appears to have been made on the basis of an incorrect and more harmful description of the proposal, which does not reflect the submitted application or the Council's own registration letter.
3. Material amendments submitted on 3 December 2025 have not been considered, and the officer report relies on superseded drawings.
4. The reasoning within the officer report is procedurally flawed, as it asserts that recommendations were not accepted despite clear evidence of engagement and revised submissions.

In light of these procedural errors, I request written confirmation of:

- How the Council intends to correct the description of development;
- Whether the decision will be withdrawn and re-issued correctly; and
- How the Council proposes to address the failure to consider the amended plans and the inaccuracies within the officer report.

My clients are considering their position with regard to a re-application and/or planning appeal, but they are particularly disappointed that this situation will now delay the opening of the restaurant. This is having a significant impact on their personal financial position and the overall viability of the business, particularly given that the lucrative Christmas period will now be missed.

I look forward to your urgent clarification.
Kind regards,

Mark Shreves

SGW Planning,
Ruislip, HA4 7ND & 69 Walter Road, Swansea. SA1 4QA
Tel: 01895 910661
01792 648380

Hi Analese,

Many thanks for your email.

I appreciate your further comments and consideration and to this end, attach an amended front elevation drawing showing the vertical and upper signage in plain aluminium finish without any illumination as indicated in my previous email.

Only the lower sign will be back illuminated as per the detail and information previously supplied.

For your information, I also attach photographs and Google Earth Streetview images of properties at the Emporium Food Centre at 9-15 Station Road, a short distance away from the application property.

Whilst these are historical signs and rather piecemeal on the adjoining properties, it does show examples of signage at high level in a not too dissimilar situation and location (in the same High Street) to the application property.

The proposal for the application property is intended to advertise the building as being fully in commercial use and has been specifically designed to offer a cohesive and visually appropriate signage solution for the whole premises, specific to the intended restaurant use over two floors.

I look forward to your further comments prior to any decision being taken on the matter.

Please accept this email as formal agreement to extend the determination period until 17th December 2025.

Kind regards,

Mark Shreves

SGW Planning,
Ruislip, HA4 7ND & 69 Walter Road, Swansea. SA1 4QA
Tel: 01895 910661
01792 648380

On Wednesday 3 December 2025 at 10:53:51 GMT, Analese Haynes <ahaynes@hillington.gov.uk> wrote:

Good Morning Mark,

Apologies for the delay in getting back to you.

If I'm honest I don't know that the proposed changes would be accepted but if you're happy to draft up the plans I can run them past the management team to give a more definitive answer.

Could we agree an extension of time for another 2 weeks (17th December)?

I will let you know before the decision is issued if the new plans are accepted.

Kind regards,

Analese Haynes
Planning Apprentice
Corporate Services
4N Civic Centre, High Street, Uxbridge, UB8 1UW
Hillingdon Council

Please note that I am out of office on Mondays.



Please note that the comments made in this email represent officer opinion and cannot be seen to prejudice the Local Planning Authority's formal determination in relation to any application or planning matter.

From: sgwplanning@aol.com <sgwplanning@aol.com>

Sent: Friday, November 28, 2025 12:04 PM

To: Analese Haynes <AHaynes@hillington.gov.uk>

Subject: Re: 24730/ADV/2025/42 | 39 STATION ROAD

Morning Analese,

I write with reference to my reply email on Tuesday and would be grateful for your further response given that your initial reference to the 28th November is now upon us?

Kind regards,

Mark Shreves

SGW Planning,
Ruislip, HA4 7ND & 69 Walter Road, Swansea. SA1 4QA
Tel: 01895 910661
01792 648380

On Tuesday 25 November 2025 at 11:06:44 GMT, sgwplanning@aol.com <sgwplanning@aol.com> wrote:

Morning Analese,

Thank you for your further email and for outlining your remaining concerns. I appreciate the time you and your manager have taken to review the proposals to date.

In response, I would like to clarify the operational context of the business and address the points raised regarding the signage.

As we have previously stated, the premises operate over two storeys, with both levels in active commercial use. Retaining a high-level fascia sign is therefore important not only for visibility but also to accurately reflect the scale and function of the business over the two-storeys.

Unlike a single-storey unit with a traditional shopfront, the nature of our layout results in an elevated business presence that benefits from appropriately positioned signage.

We understand the sensitivity of the street scene in general and, in light of the concerns regarding visual impact, the applicants are willing to try and compromise by retaining the illuminated signage at the lower level only as proposed but having both the high-level signage and the vertical signage **without illumination**.

We believe this represents a balanced approach—maintaining necessary visibility for a two-storey operation while addressing your points raised regarding lighting and amenity concerns.

We trust that this revised option provides an acceptable compromise and respectfully request that the high-level and vertical signage, in non-illuminated form, be reconsidered as part of the revised submission.

If this can be considered an acceptable compromise, we will be pleased to provide the amended drawings and details ahead of the 28 November deadline indicated.

Kind regards,

Mark Shreves

SGW Planning,
Ruislip, HA4 7ND & 69 Walter Road, Swansea. SA1 4QA
Tel: 01895 910661
01792 648380

On Monday 24 November 2025 at 13:23:46 GMT, Analese Haynes <ahaynes@hillingdon.gov.uk> wrote:

Good Morning Mark,

Apologies with the delay in getting back to you on this matter.

Unfortunately, concerns still remain despite the improvements proposed in your previous email.

With regards to the example that you have provided, I think the context here is slightly different due to the location of Mandala Restaurant.

The restaurant is a stand alone building located on the corner of Colham Mill Road set back from the main Station Road street scene, as such it has more limited visibility than shops

located on the main high street. The used of the upper fascia sign is to increase visibility from the high street. It is also worth noting that that they also only have one facisa sign located on the upper half of the building instead of the lower portion like the other shops.

If you look just across the road at the Railway Arms Pub, which is also a stand alone building, but is more prominently positioned on Station Road you can see that the fascia signs on this building more consistently mirror that of the rest of the street scene.

I would be happy to accept revised plans, however we will be refusing unless all recommended changes are made. Please respond by 28th November with how you wish to proceed.

This matter has been discussed and agreed by my manager.

Kind regards,

Analese Haynes
Planning Apprentice
Corporate Services
4N Civic Centre, High Street, Uxbridge, UB8 1UW
Hillingdon Council

Please note that I am out of office on Mondays.



Please note that the comments made in this email represent officer opinion and cannot be seen to prejudice the Local Planning Authority's formal determination in relation to any application or planning matter.

From: sgwplanning@aol.com <sgwplanning@aol.com>
Sent: Friday, November 14, 2025 9:25 AM
To: Analese Haynes <AHaynes@hillington.gov.uk>
Subject: Re: 24730/ADV/2025/42 | 39 STATION ROAD

Morning Analese,

Further to our recent correspondence, and for your additional consideration, my clients have provided the attached photographs of the *Mandala* restaurant located close to West Drayton Station. As you will see, this premises features high-level illuminated signage which appears to be a relatively recent installation/approval.

We believe this example is directly relevant to the current application, as it demonstrates that illuminated upper-level signage of comparable scale and

prominence has been deemed acceptable within the immediate local context. This reinforces our position that the proposed signage at our client's premises would not be out of character, visually intrusive, or harmful to the wider street scene, particularly given the established pattern of illuminated commercial frontages in the area.

In line with established planning principles, we respectfully highlight the importance of consistency in decision-making, particularly where comparable developments within the same locality have previously been deemed acceptable.

The presence of high-level illuminated signage at the *Mandala* restaurant, located within close proximity to the application site, demonstrates that such signage can be integrated successfully without causing harm to visual amenity.

We therefore submit that it would be reasonable and consistent for the current proposal to be assessed in a similar manner, unless there are clear and demonstrable material differences that justify an alternative outcome. To our understanding, no such distinctions apply in this case.

We would be grateful if this additional evidence could be taken into account when reassessing the appropriateness of the proposed signage.

Kind regards,

Mark Shreves

**SGW Planning,
Ruislip, HA4 7ND & 69 Walter Road, Swansea. SA1 4QA
Tel: 01895 910661
01792 648380**

On Thursday 13 November 2025 at 11:27:01 GMT, Analese Haynes <ahaynes@hillington.gov.uk> wrote:

Hi Mark,

Thank you for the detailed response.

Please allow me a few days to review and I will get back to you shortly.

Kind regards,

Analese Haynes
Planning Apprentice
Corporate Services
4N Civic Centre, High Street, Uxbridge, UB8 1UW
Hillingdon Council

Please note that I am out of office on Mondays.



From: sgwplanning@aol.com <sgwplanning@aol.com>

Sent: Wednesday, November 12, 2025 2:26 PM

To: Analese Haynes <AHaynes@hillington.gov.uk>

Subject: Re: 24730/ADV/2025/42 | 39 STATION ROAD

Hi Analese,

Many thanks for your email, the contents of which are noted.

I have consulted with my clients and would comment as follows;

- Context and Character of the Area

The site is located within a mixed-use commercial area of West Drayton where the street scene is defined by a variety of shopfronts, signage types, and illumination methods. Numerous nearby properties display outward facing illuminated signage, fascia boards, and architectural lighting at both ground and first-floor levels.

In this context, the proposed signage represents a proportionate and contextually compatible design response that reflects the commercial character of the area and enhances the visual legibility of the premises without causing visual harm.

- Functional and Planning Justification for the Upper Fascia Sign

The first floor of the premises is in lawful restaurant use, operating as an integral part of the same business that occupies the ground floor, since its conversion to restaurant use in around 2020 under previous operators.

If these signs are generally suitable where there are two separate businesses within the same building and the principle of upper fascia signage has been accepted by the Council in similar circumstances.. typically where two separate businesses occupy the building. However, the underlying rationale is to ensure that each functional space within a property is identifiable and appropriately advertised.

In this case, that same rationale applies. The upper fascia sign simply ensures that the visibility of the restaurant use on both floors is maintained and legible to the public. To distinguish its acceptability solely on the basis that one business occupies both floors would be arbitrary and inconsistent with sound planning reasoning.

The signage therefore accords with the spirit and intent of the Council's established practice in supporting upper-level fascia signs, promoting legibility and business visibility in an active town centre location.

- Visual Impact and Design Quality

The signage has been carefully designed in scale and proportion to the building's façade. The upper fascia sign sits neatly within the first-floor architectural features and does not extend above or beyond the building's frame. There is currently a blank, white painted rendered strip in the area of the building for the upper sign, which itself differs from adjoining properties which have matching face brick areas in this location.

The vertical lighting features are slender, contemporary, and architecturally integrated, serving to enhance the building's presentation rather than dominate it. The intensity of illumination is controlled and modest, ensuring the signage remains visible without contributing to glare or light pollution.

As has been indicated in the original planning statement, the lighting to the lettering and business logo projects backward onto the backboard and as such, does not project or illuminate forward of the raised lettering/logo itself.

When assessed in the context of surrounding commercial properties, the proposal would not appear overly prominent or visually intrusive, nor would it detract from the character of the area.

The proposed signage supports a lawful planning use and brand new operator, investing heavily in the premises and this part of West Drayton High Street. This local business will be contributing to the vitality, viability, and attractiveness of the local centre and High Street in accordance with NPPF Section 7 (Ensuring the vitality of town centres).

Clear, legible signage enhances footfall, promotes active frontages, and strengthens the economic sustainability of local centres such as West Drayton. Additional photographs of examples of the proposed lower signage are attached.

My clients are however willing to remove the vertical lighting from the vertical elements of the signage but would wish to retain the green vertical border and signage/lighting of the logo to the upper signage area. They may however consider removing the lighting from the upper signage logo if this would appease your current concerns and allow the elements to be retained.

My clients would very much like to work with the Local Authority to ensure a viable and positive contribution to the High Street, particularly with the level of investment made in the premises and business by the applicants.

I look forward to your further comments.

Kind regards,

Mark Shreves

**SGW Planning,
Ruislip, HA4 7ND & 69 Walter Road, Swansea. SA1 4QA
Tel: 01895 910661
01792 648380**

On Tuesday 11 November 2025 at 15:48:37 GMT, Analese Haynes <ahaynes@hillington.gov.uk> wrote:

Dear Mr Shreves,

Unfortunately I do not think that we would be able to approve the application in its current form.

The overall development would be out of character with the street scene. Having discuss this application with out management team I think the lower fascia sign would be acceptable however the lights up the side of the building and the upper fascia sign would not be acceptable.

The lights would be considered visually intrusive and over dominant within the context of the wider area,.

In terms of the upper fascia sign generally within the wider area these are approved when the first floor unit houses a different business.

I understand that this would be a disappointing outcome however please let me know whether you wish to make some amendments to the proposal or I can proceed with drafting the report with the current plans.

Kind regards,

Analese Haynes
Planning Apprentice
Corporate Services
4N Civic Centre, High Street, Uxbridge, UB8 1UW
Hillingdon Council

Please note that I am out of office on Mondays.



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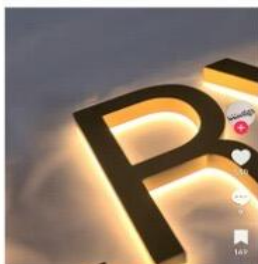
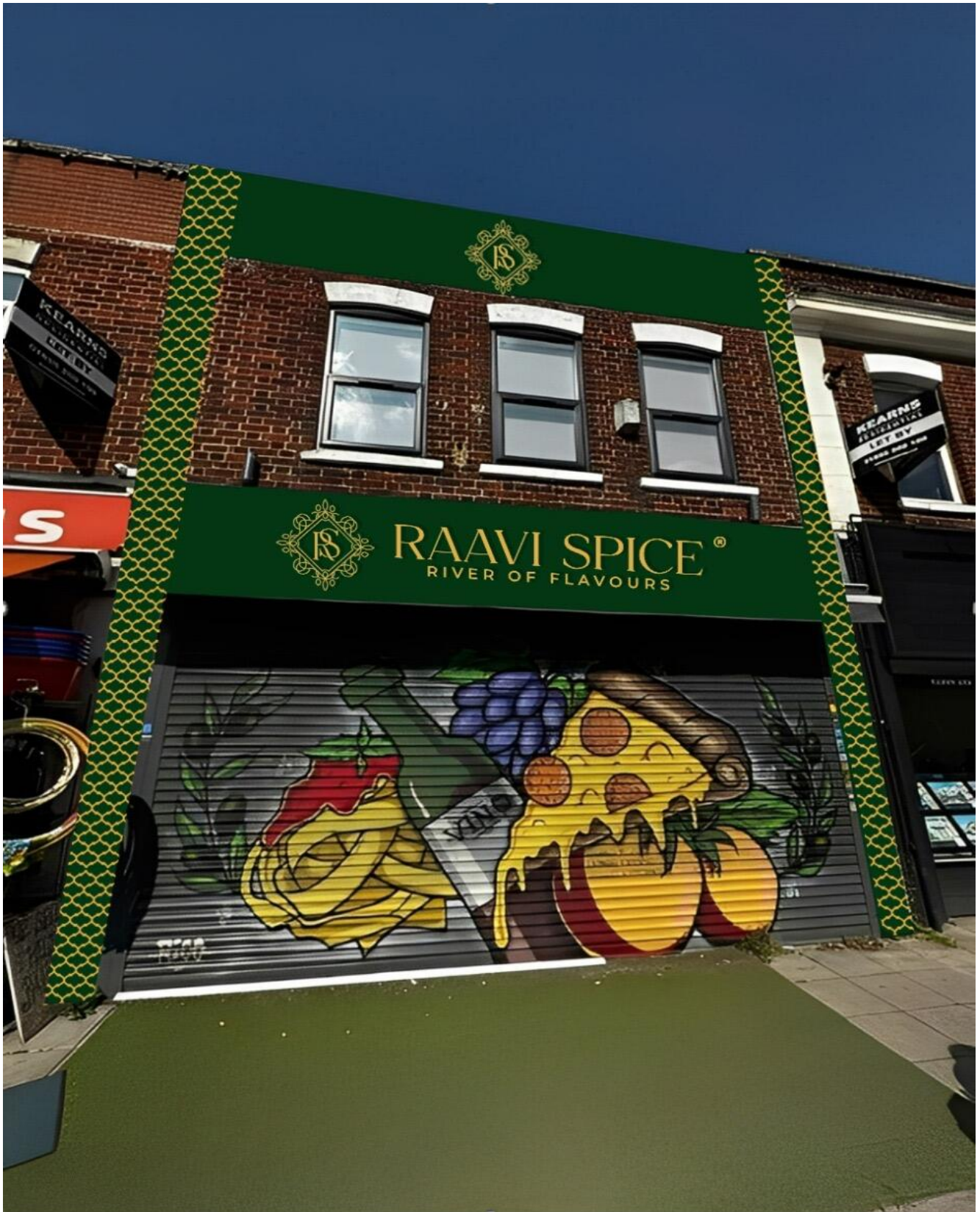
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12.3 APPENDIX C – FURTHER AMENDED SIGNAGE OPTION TO MEET CONCERNS OF PLANNING OFFICER (NOT SUBMITTED AT APPLICATION STAGE BUT POTENTIAL OPTION)



Dark Green
RAL 6005