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18.04.23

Dear Neil,

**ADVERTISEMENT CONSENT APPLICATION AT 112A GREAT RUSSELL STREET, LONDON WC1B 3NP (REF: 2023/0993/A)**

On behalf of our client, Central London Investments Ltd, we hereby respond to the comments provided by the Bloomsbury Association with respect to the advertisement consent application at 112A Great Russell Street, London WC1B 3NP. The application is described as follows:

*"Display of 1 x Internally illuminated fascia sign and 1 x internally illuminated projecting sign"*

Each of the comments made by the Bloomsbury Association are listed below in italics, with the Applicant's response provided below each in turn.

*"1. Camden's planning policy concerning advertisements is given in Local Plan policy D4. It is informed by DCLG guidance 'Outdoor advertisements and signs: a guide for advertisers' and by Camden Planning Guidance CPG:Design and CPG:Advertisements.*

*The proposal fails to meet the criteria set down in Local Plan Policy D4.*

*In Section 6 of CPG:Design Camden has formulated and adopted advertisement control policy statements, indicating what detailed considerations are regarded as relevant to their decisions on advertisement applications. These statements indicate the circumstances in which advertisements are likely to be permitted or refused and are a material factor in deciding the application. This proposal fails to meet the issues described in sections 6.11 and 6.28 – 6.32 inclusive of this document.*

*In deciding an application, DCLG guidance states that the planning authority may consider only two issues in addition to local policy statements; these are described as the interests of amenity and public safety.*

*DCLG goes on to clarify: 'The terms 'amenity' and 'public safety' are not defined in detail in the advertisement control rules, although advice on these terms is given in Circular 03/2007 and PPG 19. Each planning authority (and the Secretary of State on appeal) must interpret what is meant by these*

expressions as they apply in particular cases. In practice, 'amenity' is usually understood to mean the effect upon visual and aural amenity in the immediate neighbourhood of displaying the advertisement, or using an advertisement site, where passers-by, or people living there, will be aware of the advertisement. So in assessing amenity, the planning authority will always consider the local characteristics of the neighbourhood. For example, if your advertisement will be displayed in a locality where there are important scenic, historic, architectural or cultural features, the planning authority will consider whether it is in scale and in keeping with these features. This might mean that the planning authority would refuse consent for a large poster-hoarding which would visually dominate a group of 'listed' buildings. But where there are large buildings and main highways, for example in an industrial or commercial area of a major city, the planning authority may grant consent for large advertisements which would not adversely affect visual amenity in the neighbourhood of the site'.

'It also means aural amenity, so any noise the advertisement makes will be taken into account before express consent is given.'

' 'Public safety' means the considerations which are relevant to the safe use and operation of any form of traffic or transport on land (including the safety of pedestrians), over water or in the air. So, for this purpose, the planning authority must assess the likely effects of your advertisement in relation to such matters as the behaviour of drivers, possible confusion with any traffic sign or signal, or possible interference with a navigational light or aerial beacon. But the planning authority will assume that all advertisements are intended to attract people's attention, so that the advertisement you want to display would not automatically be regarded as a distraction to passers-by in vehicles or on foot. What matters is whether your advertisement, or the spot where you propose to site it, will be so distracting or so confusing that it creates a hazard for, or endangers, people who are taking reasonable care for their own and others' safety. When they are considering 'public safety' factors for your advertisement, the planning authority will normally consult other relevant bodies, for example the highway authority if your advertisement is alongside a major road."

**Applicant Response:** This comment merely recites policy. No response is required, but the cover letter submitted with the application includes a robust policy assessment against LB Camden's Advertisements CPG and its Design CPG.

"2. The proposal will have a significant impact on long distance views along Great Russell Street. Contrary to Local Plan policies D2 and D4, the proposal will be detrimental to local heritage assets, particularly in its harmful visual impact on important local views from the adjacent Bloomsbury and Hanway Street Conservation Areas. It will also detract from the setting of a number of nearby listed buildings, including 5-12 Great Russell Street opposite, Congress House 23-28 Great Russell Street, Lutyens former YWCA (now the Bloomsbury hotel) 16-22 Great Russell Street and 98-109 Great Russell Street. No evidence is provided with the application to justify such a dramatic change in the building's impact on London's streetscape. The drawings accompanying the application ignore the city context totally, which is so important in assessing the proposal and give a clear insight into the applicant's objectives.

Reference should be made to the projecting signs on 98-103 Great Russell Street as an indication of what might be suitable in such a sensitive streetscape.

We are surprised that the Council agreed to even register the application without any visual impact assessment including photomontage images from key viewpoints and without accurate existing and proposed elevations. The proposal cannot be adequately considered without a proper assessment of

*context and the Council will be failing in its duty to approve the application on this basis, a decision that arguably would be invalid."*

**Applicant Response:** The proposed signage would have adequate visibility along Great Russell Street. It is anticipated that the vast majority of visitors would approach the site by foot from Tottenham Court Road, meaning that the signage would need to direct visitors arriving along the short stretch of Great Russell Street that adjoins Tottenham Court Road. The signage has been designed with these requirements in mind and is therefore sympathetic to nearby heritage assets.

Both signs use a muted colour palette and subtle LED lighting, which ensures that its impact on nearby heritage assets. For these reasons, the signs would not constitute a *"dramatic change in the building's impact on London's streetscape"*, as is suggested by the objector.

The application was submitted by the Applicant – and subsequently reviewed by the Council – with reference to LB Camden's validation requirements. As such, adequate scrutiny was applied from both sides to validate the application.

*"3. The proposal is over-signed as to render this part of Great Russell Street so distracting or so confusing that it creates a hazard for, or endangers, people who are taking reasonable care for their own and others' safety. Existing and proposed elevations make no reference to the large sign above the adjacent entrance to the YMCA, nor to the storey-high signage in its windows and to the adjacent windows to the St Giles Casino. Nor are unauthorised external alterations and signage to the adjacent unauthorised use of Tea Knows acknowledged - see accompanying photos."*

**Applicant Response:** It is unreasonable to suggest that the two small signs creates a hazard to pedestrians – either in isolation or through cumulative impacts. Extended elevations are not required to determine the application, but if they were, the proposed signage would compare favourably with the more garish examples referenced by the objector.

*"4. Light pollution from the proposed signs may impact on the amenity of residential uses directly opposite at 5 Great Russell Street."*

**Applicant Response:** The signs are internally illuminated by subtle LED lighting, with an illuminance level of 350cd/m<sup>2</sup> for both. It is unreasonable to conclude that the proposed signage would lead to light pollution, especially in the context of this busy Central London location.

*"5. The proposed projecting sign ignores the commemorative plaque located in the same position. This is to Harold Arundel Moody, 1882-1947 Jamaican Doctor, Humanitarian and Civil Rights Activist who established the League Of Coloured Peoples at a meeting at the YMCA in 1931. Moody is named on the list of "100 Great Black Britons" and the plaque was unveiled by Camden's Mayor on 13 March 2019 - see accompanying photos."*

**Applicant Response:** We acknowledge that this is an important consideration and have therefore amended the proposed location of the projected sign in order to preserve the plaque. An updated proposed elevation is enclosed.

*"6. The proposed projecting sign also seems to conflict with existing telecommunications equipment, security cameras and external lighting located in the same position – see accompanying photos."*

**Applicant Response:** As explained above, the proposed location of the projecting sign has been amended which resolves this matter.

*"7. The height of individual letters stated in the application form for both the projecting and fascia signs is incorrect and neither capable of implementation nor enforcement."*

**Applicant Response:** The size of the lettering on the proposed signs stated on the application form was derived directly from the architectural drawings. If approved, the decision notice would include a standard condition requiring it to be built in accordance with the approved drawings, which would secure the size of the lettering.

*"8. Contrary to what is stated in the application form, existing signs for the previous use of the premises as a car park are still in place at the corner of Tottenham Court Road and Great Russell Street and at the corner of Great Russell Street and Adeline Place. These should be removed and the street nameplate at the corner of Tottenham Court Road and Great Russell Street reinstated in its original position."*

**Applicant Response:** The signs referred to by the objector are not within the red line boundary of the application and hence would not need to be replaced to accommodate the proposed signage.

*"9. The statement on ownership included in the application form appears to be incorrect. Officers are referred to separate comments submitted on behalf of the St Giles Hotel and application 2018/6039/A."*

**Applicant Response:** The Applicant owns the site on which advertisement consent is sought. The application form for the application that the objector has referred to includes the question: "[d]oes the applicant own the land or buildings where the adverts are to be placed?", which had been answered 'no'. Accordingly, Condition 1 of the consent the objector refers to is:

*"No advertisement is to be displayed without the permission of the owner of the site or any other person with an interest in the site entitled to grant permission."*

*Reason: - As required by regulation 2(1) and Schedule 2 of the Town & Country Planning (Control of Advertisements) (England) Regulations 2007."*

This confirms that the Applicant for application 2018/6039/A does not own the land in question, which is instead owned by the Applicant for the present application.

In summary, the Applicant has adequately addressed the matters raised by the Bloomsbury Association – none of which cause the proposed signage to be unacceptable.

Yours sincerely,



**Tarun Cheema BA MSc**  
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