

Date: 31 May 2023

Our Ref: LP493
Planning Portal Ref: PP-12013907

Camden Council
Planning - Development Control,
Camden Town Hall,
London,
WC1H 8ND

Dear Sir/Madam,

1 ELY PLACE, LONDON, EC1N 6RY
ADVERTISEMENT CONSENT APPLICATION
PP-12013907

On behalf of our client, Cosentino, please find enclosed an advertisement consent application for the installation of new signage on the Charterhouse Street and Hatton Garden elevations of the ground floor unit of 1 Ely Place.

The description of development is as follows:

"Display of three non-illuminated lettering signs on existing fascias, display of three projecting signs with illuminated lettering and application of non-illuminated vinyl lettering on Hatton Garden, Holborn Circus and Charterhouse Street elevations of ground floor unit."

In respect of the above, we have submitted the following documents on the Planning Portal:

- Planning and Heritage Statement (this document, prepared by Logic Planning);
- Key Planning Policies (Appendix A of this document);
- Completed forms;
- CIL Form;
- Existing and Proposed drawings (prepared by Tetris Design and Build):
 - Site Location Plan and Site Plan (Dwg. No. UKCSN-TET-SW-00-DR-I-00.950);
 - Existing Plans and Elevations (Dwg. No. UKCSN-TET-SW-00-DR-I-00.951);
 - Proposed Plans and Elevations (Dwg. No. UKCSN-TET-SW-00-DR-I-00.952 B); and
 - Detailed Elevations and Sections of projecting signage (Dwg. No. UKCSN-TET-SW-00-DR-I-00.953 B).

The submitted drawings contain details of the proposed signage at a scale and level of detail usually required for the discharge of conditions. We would be grateful if you could request any further necessary detail during the determination phase of the application so that pre-commencement conditions can be avoided.

The application fee of £132 and the Planning Portal's service charge of £64 have been paid online using the Planning Portal payment service.

Below is a detailed description of the proposed development, a review of the planning history of the site and the assessment of the compliance of the development with Camden's development plan policies.

Site and surrounding area

The site is the ground floor Class E unit of 1 Ely Place, a five-storey plus basement corner building located at the junction of Ely Place, Charterhouse Street, Hatton Garden and Holborn Circus. Due to the downward slope of Charterhouse Street towards the east, the building has four storeys on the Hatton Garden side and five storeys along Ely Place. The unit subject of this application has a double internal height and, whilst having a Ely Place address, is accessed from a main entrance facing Hatton Garden.

The unit was previously occupied by NatWest Bank and had illuminated lettering on the existing top fascias facing the streets and two non-illuminated hanging signs at half-height on the double-height frontage (see picture below).



Figure 1 - Street view of the site with previous commercial occupiers - February 2018, Credit: Google
Three illuminated NatWest logos and lettering on fascias facing Hatton Garden (left), Holborn Circus (centre) and Charterhouse Street (right), and two round non-illuminated projecting signs with NatWest logo above main entrance on Hatton Garden (left) and along Charterhouse Street elevation (right)

The site is located within the Hatton Garden Conservation Area. The Hatton Garden Conservation Area Appraisal and Management Strategy (2017) identifies the building on site to be a positive contribution to the Hatton Garden Conservation Area.

1 Ely Place is not listed but is within the setting of 5 Hatton Garden and 7-9 Ely Place (with associated railings and lamp holder), which are Grade II listed.

Site designations

- Central London Area;
- Central London Frontage – Holborn;
- Hatton Garden Conservation Area;
- Hatton Garden Area;
- Primary Shopping Frontage;
- Archaeological Priority Area;

Planning history (excluding minor, non-material amendment and discharge of conditions applications)

- **2020/5491/P** - The erection of a full height glazing extension on fourth floor, alteration to the ridge to align with parapet, extension of lift overrun enclosure, removal of redundant roof top plant, corrugated metal cladding and brick parapet, replacement of plant and installation of metal balustrade - Permission Granted (10/02/2022)
- **2020/2337/A** - Display of non-illuminated, painted and stencilled fascia signage to Hatton Garden and Ely Place elevations. - Permission Granted (23/06/2020)
- **2019/4386/P** - Change of use to ground floor and basement from Bank (Class A2) to Offices (Class B1) with external alterations. - Permission Granted (11/03/2020)

Proposed development

Signage

The following new signage is proposed:

- 3 x non-illuminated milky white plexiglass “Cosentino” lettering fixed to existing fascias on the Hatton Garden, Holborn Circus and Charterhouse Street elevations;
- 9 x non-illuminated black vinyl lettering applied to top part of windows on the Hatton Garden, Holborn Circus and Charterhouse Street elevations; and
- 3 x black rectangular projecting signs with illuminated white milky white lettering on the Hatton Garden and Charterhouse Street elevations.

Further details of the materials, lettering, illumination and size of the proposed signage are set out in the application drawings.

Planning policy framework

The Development Plan documents of relevance for this application include the London Plan 2021 (LP) and the Camden Local Plan 2017 (CLP).

The Camden Planning Guidance 1 – Design (**CPG1 Design**), the Camden Planning Guidance – Advertisements (**CPG Advertisements**), the Hatton Garden Conservation Area Appraisal and Management Strategy (**Hatton Garden CAAMS**) and the National Planning Policy Framework 2021 (**NPPF**) are also relevant for the assessment of the proposed development.

Below is a summary of the relevant planning policy considerations that should be taken into account in assessing the proposal. The key planning policies of the local development plan are listed in Appendix A of this document.

Planning assessment

Architecture and urban design

The proposed signs will have an unobtrusive design which will not draw attention away from the building or affect views within the conservation area. The small projecting sign and the non-illuminated lettering on the main fascias will be subservient to the main building and comparable to the style of prominent corner buildings within the wider conservation area.

The original surface of all the main fascias on top of the unit, which were until recently covered by a shallow box sign with illuminated logos and lettering of NatWest (See Figure 1), will be repainted in black. The new lettering will have a modest thickness of 60 millimetres and will be placed centrally on the three elevations of the building facing Hatton Garden, Holborn Circus and Charterhouse Street, in exactly the same location of the now removed NatWest signage. Contrary to the previous signage, the new lettering on the fascias will not be illuminated.

Only the letters of the three small projecting signs on the Hatton Garden and Charterhouse Street elevations will be illuminated. The signs themselves will not be illuminated and will have a matt black colour to blend with the colour of the main top fascia. When compared to the NatWest arrangements, the illuminated elements of the proposed signage (the letters of the three projecting signs) will be located at a much lower and less prominent level and will be much smaller than the pre-existing illuminated lettering on the main fascias. This will ensure that the proposal will avoid visual impacts on the street and the conservation area and preserve the character of the host building.

The black vinyl lettering applied to the windows of the unit will blend with the background of the interiors of the building and will not divert attention away from the visual patterns and hierarchies of the facades. When compared with the coloured and large posters fixed internal to the windows when the unit was occupied by NatWest Bank (see Figure 1), the proposed lettering will represent a significant aesthetic improvement and, in itself, an elegant addition to the frontage.

The proposed works will improve the appearance of the host building whilst respecting and remaining in keeping with the existing character of the wider area through the retention of the existing proportions and ornate detailing of the ground floor unit and a careful choice of materials and finishes for the signage. It is therefore

considered that the proposals will not have any detrimental impact on the townscape at the junction of Hatton Garden, Ely Place and Charterhouse Street. The proposed signage will also represent a significant improvement when compared to the previous commercial advertisements that have been allowed on site, most recently for NatWest Bank.

For these reasons, we submit that the proposal will comply in full with the requirements of Policies D1 and D4 of the Camden Local Plan, the NPPF and the guidance contained in the CPG - Advertisements.

Heritage

The proposed signage would not obscure or damage any significant architectural features of the host building, nor detract from the character and appearance of the host building and Hatton Garden Conservation Area, in accordance with the guidelines of the Council's CPG Advertisements.

The top lettering fixed on the existing fascias will be located in the same position of the previous signage of NatWest, will have a comparable height and width and will not be illuminated. The lettering will therefore not affect views through the conservation area or erode the contribution of the building to the quality of the surrounding urban context.

The three projecting signs will be located at mid-height on the facades and will have a non-illuminated black casement with small retro-illuminated letters. These advertisements will blend within the wider streetscape of Hatton Gardens, Holborn Circus and Charterhouse Street and will have levels of illumination comparable to those of the Pret a Manger shop to the east, and the Bounce and Sainsbury's ground floor units of the building immediately to the west of the site along Holborn. When compared to these adjoining examples of illuminated advertisements, the proposed projecting signs will have very small letters and will therefore blend seamlessly with the appearance of the southern edge of the Hatton Garden Conservation Area.

1 Ely Place is within the setting of 7-9 Ely Place (with the associated railings and lamp holder) and 5 Hatton Garden, which are Grade II listed buildings. The proposed advertisements will be contained within the existing façade of the host building at 1 Ely Place and they will not visually compete with the surrounding properties, so the proposal will not negatively impact upon the setting or harm the special interest of the listed buildings in the vicinity.

It is therefore considered that the proposed development will have a neutral impact on the significance of the Hatton Garden Conservation Area and the setting of the listed buildings in the vicinity, resulting in no harm to these heritage assets. This will be in compliance with the requirements of Policy HC1 of the London Plan, Policy D2 of the Camden Local Plan, and the guidance set out in the CPG Advertisements and in the Hatton Garden Conservation Area Appraisal and Management Strategy.

Residential amenity

The proposed signage will not affect or obstruct any view from private residential properties towards the public realm or any private outlook within the conservation area.

The letters of the three signs projecting from the Hatton Garden and Charterhouse Street elevations will be small when compared with the double-height frontages of the unit and will have a luminance of 200 cd/m², which will be well below the maximum levels of luminance considered acceptable in urban environments by the Institute of Lighting Engineers PLG05 The Brightness of Illuminated Advertisements (See Appendix 1 the below).

The proposal would therefore comply with Policy A1 of the Camden Local Plan.

Public and highway safety

The proposed signage will be located at a high level and will not obstruct or hinder sight lines or view cones along public highways and vehicular access points, nor will it block the intervisibility between road users and traffic signs in the vicinity. The signage is therefore not considered to have any impact on public or highway safety, in line with the requirements of Policy A1 of the Camden Local Plan.

Conclusions

The proposed development will improve the appearance of the building, will preserve the significance of the Hatton Garden Conservation Area and will not have any impact on the setting of the listed buildings in the vicinity. There will be no impacts on residential amenity or highway safety.

For these reasons, we submit that the proposal will comply in full with Camden's development plan and be a sustainable form of development that should be approved.

We look forward to receiving confirmation of receipt and validation. If you have any queries, please do not hesitate to contact Lorenzo Pandolfi of this office at lorenzo.pandolfi@logic-planning.com or 07825 471559.

Yours faithfully,

L . P .

Logic Planning (part of Planning Communications Ltd)
info@logic-planning.com

APPENDIX A - KEY PLANNING POLICIES

Architecture and urban design

Paragraph 81 of the NPPF states that planning policies and decisions should help to create the conditions in which businesses can invest, expand, and adapt. As such, significant weight should be placed on the need to support economic growth and productivity, considering both local business needs and wider opportunities for development.

Paragraph 126 of the NPPF outlines that good design is one of the fundamental factors in ensuring sustainable development and contributes to creating better places to live and work, and to help make development acceptable to communities.

Paragraph 130 of the NPPF sets out that planning policies and decisions should ensure that developments will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development. Similarly, development should create places that maintain a high standard of amenity.

Paragraph 136 of the NPPF states that *"the quality and character of places can suffer when advertisements are poorly sited and designed. A separate consent process within the planning system controls the display of advertisements, which should be operated in a way, which is simple, efficient and effective. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts"*.

Policy D1 of the Camden Local Plan provides detailed guidance on the design standards expected in new developments. It states, among other things, that developments should respect local context and character, preserve or enhance the historic environment and heritage assets and comprise details and materials that are of high quality and complementary to the local character. Policy D1 also requires new developments to preserve strategic and local views.

Policy D4 of the Camden Local Plan states that *"advertisements and signs should be designed to be complementary to and preserve the character of the Host building and local area. The size, location, materials, details and illumination of signs must be carefully considered. Advertisements in conservation areas and on or near listed buildings require particularly detailed consideration given the sensitivity and historic nature of these areas or buildings. Any advertisements on or near a listed building or in a conservation area must not harm their character and appearance and must not obscure or damage specific architectural features of buildings"*.

The policy also states that *"consideration should be given to the intensity of the illumination surface area to be illuminated and the positioning and colours of advertisements. The type and appearance of illuminated signs should be sympathetic to the design of the building on which it is located. The method of illumination (internal, external, lettering, neon, etc.) should be determined by the design of the building"*.

The CPG Advertisements states that *"advertisements and signs should respect the form, fabric, design and scale of the host building and setting. All signs should serve as an integral part of the immediate surroundings and be constructed of materials that are sympathetic to the host building and the surrounding area"*.

Paragraphs 1.14 and 1.15 of the CPG Advertisements read as follows:

"The type and appearance of illuminated signs should be sympathetic to the design of the building on which it is located. The method of illumination (internal, external, lettering, neon, etc.) should be determined by the design of the building. Illuminated signs should not be flashing or intermittent, whether internal or external.

Externally illuminated signs should be unobtrusively sized and sited. Spotlights and trough lights should be fixed and sized as discreetly as possible to avoid light pollution. Corporate designs involving internally illuminated signs may need to be modified where they are considered unsuitable, especially in residential areas, or conservation areas, or on listed buildings."

Paragraph 1.18 of the CPG Advertisements states that *"internally illuminated box signs are discouraged. Generally, the internal illumination of individual letters, rather than the whole fascia or projecting sign on a shopfront, will be more appropriate"*.

Heritage

Sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (the Act) relate to Listed Buildings. Section 66(1) states that *"in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses"*.

Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (the Act) places a duty on the decision maker to have special regard to the desirability of preserving or enhancing the character or appearance of a Conservation Area.

Paragraph 194 of the NPPF states that, in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting, and that the level of detail should be proportionate to the assets' importance. 'Significance' is defined in the Glossary of the NPPF as *"the value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic"*.

Paragraph 199 of the NPPF states that in considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. Conservation, for heritage policy purposes, is defined in the NPPF Glossary as *"the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance"*.

Paragraph 202 of the NPPF states that *"where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use"*.

Policy HC1 of the London Plan states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the asset's significance and appreciation with their surroundings.

Policy D2 of the Camden Local Plan relates to heritage assets. It states that the Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.

In relation to conservation areas, Policy D2 states among other things that the Council will require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area.

In relation to listed buildings, Policy D2 states among other things that the Council will resist development that would cause harm to the significance of a listed building through an effect on its setting.

The CPG Advertisements states that *"advertisements in conservation areas and/or on listed buildings require detailed consideration given the sensitivity and historic nature of these areas or buildings. Any advertisements, of whatever type, on or near a listed building or in a conservation area must not harm their character and appearance and must not obscure or damage specific architectural features of buildings"*, in line with Policy D4 of the Camden Local Plan.

Ely Place is identified within the **Hatton Garden CAAMS** as being an example of a relatively intact eighteenth-century development. 1 Ely Place is identified as a building that makes a positive contribution to the Conservation Area.

Paragraph 9.4 of the Hatton Garden CAAMS states that *"proposals for new shopfronts or alterations to existing shopfronts will be expected to preserve or enhance the historic character of the Area through careful, high quality design, while respecting the proportions, rhythm and architectural form of any nearby shopfronts of merit (see Audit). Shopfronts of merit should be retained or sensitively adapted; their loss will be strongly resisted. Internally illuminated box signs are out of keeping with the character of the Area and are generally unacceptable"*.

Residential amenity

Policy A1 of the Camden Local Plan states that the Council will seek to protect the quality of life of occupiers and neighbours, and that it will grant permission for development unless it causes unacceptable harm to amenity.

Paragraph 1.13 of the CPG Advertisements states that *"the illumination levels of advertisements should be in accordance with the guidance set by the Institute of Lighting Engineers PLG05 The Brightness of Illuminated Advertisements"*.

The site is in an urban "environmental zone" (E4), as defined by Table 3 of the PLG05 The Brightness of Illuminated Advertisements, where illuminated areas of up to 10 m² should not have a luminance of more than 600 cd/m² and illuminated areas of more than 10 m² should not have a luminance of more than 300 cd/m².

Public and highway safety

Policy A1 of the Camden Local Plan states that the Council will resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network.

Paragraph 1.10 of the CPG Advertisements states that *"advertisements will not be considered acceptable where they impact upon public safety, such as being hazardous to vehicular traffic (e.g. block sight lines, are more visible than traffic signals, emit glare) or pedestrian traffic (e.g. disrupt the free flow of pedestrian movement)".*

In relation to illuminated signs, **Paragraph 1.17 of the CPG Advertisements** states that *"applicants should ensure that an advertisement does not become unduly dominant in the street scene, disturb adjoining residents at night, or cause safety hazards to drivers".*