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Planning Department
London Borough of Camden
5 Pancras Square
London
N1C 4AG

FOA Sam Fitzpatrick

02 June 2023

Our Reference: 23/115
Via PLANNING PORTAL

Dear Sam,

**TOWN AND COUNTRY PLANNING (CONTROL OF ADVERTISEMENTS) (ENGLAND)
REGULATIONS 2007**

40 WHITFIELD STREET, LONDON W1T 2RH

APPLICATION FOR FULL ADVERTISEMENT CONSENT

We write on behalf of our client, E&A West End Properties Limited ('the Applicant'), to formally submit an application for Advertisement Consent in accordance with the Town and County Planning (Control of Advertisements) (England) Regulations 2007 for the above site.

This application seeks Advertisement Consent for the following development:

"Installation of street numbering signage at fascia level adjacent to the 38 Whitfield Street building entrance including 1x street numbering signage and 1 x vinyl signage"

The proposals have been submitted as part of an overall strategy to improve the wayfinding and legibility of the building's entrance following the recent grant of planning permission to install a new door to the subject property (LPA ref. 2022/3007/P).

The following documentation has been submitted with this application:

- This Covering Letter / Planning Note
- Application Forms and Certificates
- Site Location Plan, prepared by BASE
- Existing Elevation. Prepared by BASE
- Proposed Signage Plan, prepared by BASE

a. The Site and Relevant Background

40 Whitfield Street is an existing five storey (plus basement) commercial building that was constructed in the early 1990s. The full address of the building is 34-42 Whitfield Street and connects internally to 10-16 Goodge Street, with the larger commercial building having frontages to both Whitfield Street and

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Goodge Street. An existing Tesco Metro retail unit is provided on the Goodge Street/Whitfield Street corner, with the remainder of the building being used for general Class E commercial purposes.

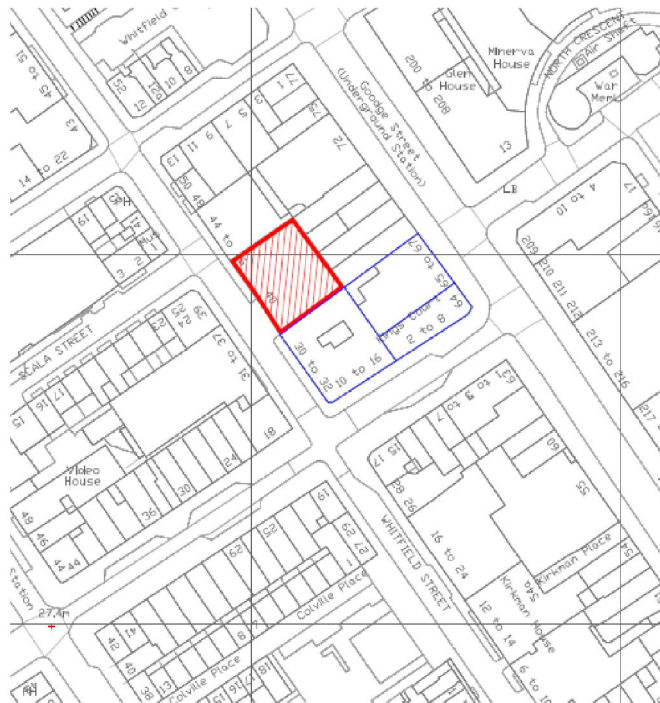
The building was constructed in accordance with planning application reference 8800483, which saw planning permission granted to provide retail and office accommodation at ground floor level, with office accommodation on the upper floors.

Planning permission was granted in March 2023 (LPA ref. 2022/3007/P) for the installation of a new entrance door at the southern end of 40 Whitfield Street.

The proposed street numbering signage, therefore, would be located adjacent to this new building entrance and is part of an overall strategy to improve the wayfinding and legibility of the building.

The Site location plan is provided at **Figure 1** below.

Figure 1: Site Location Plan



Planning policy designations

The Application site is situated within Holborn and St Pancras ward within the London Borough of Camden. It is subject to the following designations:

- London's Central Activities Zone (CAZ)
- Goodge Street Neighbourhood Centre
- Charlotte Street Conservation Area

It is also noted that the site falls outside of a primary shopping frontage, with this frontage located along Goodge Street rather than Whitfield Street.

The buildings are not locally or statutory listed.

The site also benefits from a public transport accessibility level (PTAL) of 6b, indicating excellent public transport connectivity.

b. Proposed Development

The proposed development seeks full advertisement consent for the installation of street numbering signage at fascia level adjacent to the 38 Whitfield Street building entrance including 1x street numbering signage and 1 x vinyl signage.

The proposed signage would be located at fascia level adjacent to the approved building entrance door at the southern end of the Site's primary frontage to Whitfield Street.

The proposed street numbering as '38 Whitfield Street' would allow the building entrance to be differentiated from the building's other primary entrance at the northern end of the Site. This would improve the overall wayfinding and legibility of the building.

The proposed dimensions and materials of the proposed signage are summarised as follows:

Letter Signage:

- Located 1.7m above ground level
- Displaying '38'
- 250mm H x 350mm W x 25mm D
- Affixed using pins and epoxy resin to the wall to the north of the building entrance
- Powder coated stainless steel to be finished in jet black (RAL 9005)
- No lighting proposed.

Vinyl Signage

- Located 2.5m above ground level
- Displaying '38 Whitfield Street'
- 370mm H x 920mm W x 0mm D
- Vinyl lettering in matt white applied internally to the headlight above the door
- No lighting proposed.

The proposals relate to building identification signage only, and do not seek to change the existing GIA of the Site. They do not seek to change the Site's existing use.

No change to the existing and approved building access arrangements are proposed.

Further details of the proposed signage are set out within the accompanying plans prepared by BASE.

c. Planning Policy Assessment

Current national guidance on advertisement control is set out in the National Planning Policy Framework (NPPF), which recognises that the control over outdoor advertisements should be efficient, effective and simple in concept and operation.

The NPPF clarifies (in Paragraph 136) that the display of advertisements should only be controlled in the interests of “amenity” and “public safety”, taking account of cumulative impacts, as guided by the Town and Country Planning (Control of Advertisements) (England) Regulations 2007, as amended.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning decisions must be made in accordance with the Development Plan, unless material considerations indicate otherwise.

The relevant Development Plan for the site consists of:

- The London Plan (2021)
- The Camden Local Plan (2017).

Camden also has a number of Camden Planning Guidance documents (CPGs), along with the Charlotte Street Conservation Area Appraisal and Management Document (2008) which form material considerations for this application. Of relevance to this application is the Advertisements CPG (2018).

An assessment of the key planning considerations is set out below.

Principle of Development

The proposals relate to the installation of building identification signage to improve the legibility and wayfinding of the entrances to an existing commercial building.

The proposed alterations, are therefore, considered to be entirely in accordance with the objectives of Policy E1 of the Local Plan (2017) in that it would enhance the quality of an existing commercial asset within Central London Area of the Borough, in which the Site is situated.

Design, Materiality and Heritage

Policy Position

Local Plan Policy D1 ‘Design’ seeks to secure high quality design in all development that respects local character and context. Specifically, in relation to shopfronts, it encourages active shopfronts that add vitality to the street and provide views into and out of buildings, and specific proportions at ground floor level to attract pedestrians.

Policy D2 ‘Heritage’ requires that development within conservation areas preserves or, where possible, enhances the character or appearance of the area.

Policy D4 of the Local Plan (2017) relates to advertisements. The policy seeks to ensure that advertisements preserve or enhance the character of their setting of the host building. Advertisements must respect the form, fabric, design and scale of their setting and host building and be of the highest standard of design, material and detail.

Policy D4 of the Local Plan (2017) notes that advertisements should be located at fascia level or below.

Camden’s Advertisements Planning Guidance (2018) includes further guidance on the types of signage that the Council will accept. This guidance recommends that signage needs to respect the architectural features of the host building and the surrounding area, particularly within conservation areas which includes the subject site. The guidance outlines that the material quality of the signage should be high, and the colour palate as muted as possible.

The Charlotte Street Conservation Area Appraisal and Management Plan (2008) assesses the key characteristics of the conservation area. The Appraisal doesn't identify the building as a positive or negative contributor to the character and appearance of the conservation area, and it also notes that Whitfield Street is a street defined by more modern, 20th century buildings. It notes a variety of brick and render as being the predominant materials.

Assessment

The proposed development seeks full advertisement consent for the installation of street numbering signage at fascia level adjacent to the 38 Whitfield Street building entrance including 1x letter signage and 1 x vinyl signage. No lighting is proposed.

The proposed street numbering as '38 Whitfield Street' would allow the building entrance to be differentiated from the building's other primary entrance at the northern end of the Site which is identified as '40 Whitfield Street'. This would improve the overall wayfinding and legibility of the building.

It is also noted that a number of other properties along Whitfield Street contain building identification signs associated with entrances to commercial properties and, in this context, the proposed signs are considered appropriate and would be in keeping with the character of the surrounding conservation area.

An example of street numbering signage can be found at 44 Whitfield Street, whilst 30-32 Whitfield Street provides an example of vinyl lettering signage. The proposed signage has taken cues from this signage and in terms of location, materiality, muted colour palette, and typography of signage within the surrounding streetscape.

By virtue of the size, scale and siting of the signage, it is considered appropriate and proportionate to the existing building and surrounding street scene. The signage would be associated with an approved new entrance to the building and would allow visitors and tenants of the building to clearly identify the entrance and building name when approaching either from the north or south on Whitfield Street.

A further consideration for any new sign is highway safety. In this respect, the signs would not include any lighting, or be incongruous or unduly prominent and would be a sufficient height above pavement level to ensure it would not be an obstruction for pedestrians or a distraction or visual obstruction to drivers.

The proposed signage is, therefore, considered acceptable and will not result in a detrimental impact on the character and appearance of the building or surrounding conservation area, or compromise highway safety. As such, the proposal complies with the requirements of Policy D4 the Local Plan.

d. Summary

Overall, the proposed development is considered to represent a sensitive improvement to the building's wayfinding and legibility which would conserve the character of the surrounding conservation area.

The proposals have been assessed and considered to comply with the relevant adopted and emerging planning policy and guidance.

We trust that the enclosed information is sufficient to expedite validation of our application. However, should you require any further information, please do not hesitate to contact Tim Fleming (██████████) or (██████████) of this office in the first instance.

Yours sincerely,

Iceni Projects Ltd.

Iceni Projects

ENC. As listed above.