3 August 2023



Planning Services London Borough of Camden 2nd Floor, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE

23.1913/ac

Dear Sir / Madam,

Building C, Camden Lock Place, The Stables Market, Chalk Farm Road, London, NW1 8AB Application for advertisement consent for the installation of signage

Introduction

On behalf of our client, Junkyard Golf, please find attached an application for Advertisement Consent for the installation of signage at Building C, Camden Lock Place, The Stables Market, Chalk Farm Road, London, NW1 8AB. The proposal is for the installation of an illuminated projecting sign.

The sign will be installed above the main entrance to the premises and will read 'Junkyard Golf Club'. The premises are currently vacant following the closure of 'Shaka Zulu'. Junkyard Golf are shortly to open from the premises as a crazy golf venue with food and drink. As part of the signage strategy vinyls will be installed to entrance doors. Thes vinyls benefit from deemed consent and do not require express advertisement consent.

In order to provide a clear understanding of the proposal, this letter provides a brief background to the application site and its surroundings; includes a description of the proposed signage; sets out the planning policy guidance of relevance to the proposal; and, assesses the proposed signage against the relevant planning policy context.

The Application Site and Surrounding Area

The application site relates to the entrance to Building C, Camden Lock Place, The Stables Market, Chalk Farm Road, London, NW1 8AB (see figures 1 and 2 below). The application property forms part of a mixed use retail and leisure complex with the overall development incorporating historic and modern buildings. Building C is a modern building (built c.2000) and is situated on the north side of Camden Lock Place. The building is constructed of red brick, metal cladding and glazing. Camden Lock Place is a vibrant pedestrianised street and is used by the various food and drink businesses for outdoor seating and is characterised by signage and commercial branding. The application building itself is not of any heritage value.

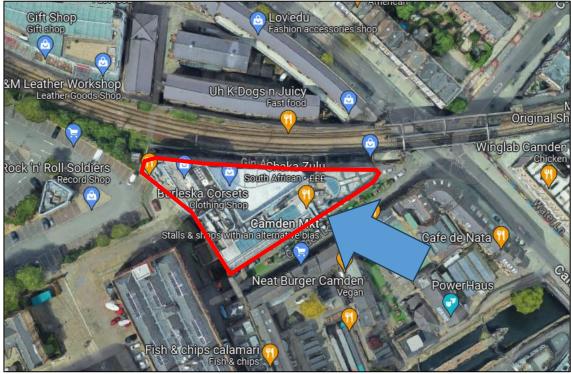


Figure 1: Aerial view of the site (outlined red at basement level) and surrounding environment. The proposed signage location is identified by the arrow.



Figure 2: View of the proposed signage area viewed from Camden Lock Place.

In terms of planning policy, the site is located within the Regents Canal Conservation Area, is within the designated Camden Town Centre and is within the Canalside Industry Archaeological Priority Area.

To the east of the site, at the end of Camden Lock Place, is 'The Interchange on North Side of Grand Union Canal Including The Horse Tunnel and Stairs, Vaults and Canal Basin' which is a Grade II listed heritage asset. The subject property and signage location has a degree of intervisibility with this heritage asset.

The Application Proposal

This application is for advertisement consent for the installation of an illuminated projecting sign. The sign will be installed above the main entrance to the 'Junkyard Golf' premises which is due to open imminently. The signage will be installed in the location of previous branding associated with the 'Shaka Zulu' premises (as shown by figure 4 below) but which has since been removed.

The sign will be mechanically fixed to the building. It will comprise 5mm Opal 050 acrylic and will be internally illuminated by RGB LEDs. The acrylic panel will be mechanically fixed and bonded into a front panel and will feature black vinyl lettering to the face of the acrylic, to read 'Junkyard Golf Club'. There will be 3mm thick aluminium front panels, painted RAL 9005, black satin to form a 25mm wide border to all sides. Behind the projecting sign matt black 3mm dibonded panels will be installed to the existing building elevation with LED strip lighting incorporated. Full details of the proposals are provided by the application drawings with figure 3 below providing 'mock-up' views.



Figure 3: 'Mock-up' views of proposed signage.



Figure 4: Google Streetview image showing former branding associated with 'Shaka Zulu'.

Planning Policy Context

Planning policy guidance of relevance to the proposal is contained within the Town and Country Planning (Control of Signage) (England) Regulations 2007; the National Planning Policy Framework (2021); National Planning Practice Guidance; the Camden Local Plan (2017); Camden Planning Guidance on Advertisements (2018); and, Camden Planning Guidance on Design (2021).

Town and Country Planning (Control of Signage) (England) Regulations 2007

Government Circular 03/2007 Town and Country Planning (Control of Signage) (England) Regulations 2007 requires local planning authorities to exercise their powers in relation to impact on amenity or public safety only, taking into account relevant development plan policies so far as they relate to amenity or public safety.

National Planning Policy Framework (NPPF)

The NPPF sets out the Government's planning policies for England and is a material consideration in the determination of planning applications. A revised NPPF was published in July 2018 and updated most recently in June 2021. The document states that the purpose of the planning system is to contribute to the achievement of sustainable development. Of relevance to the application proposal, it seeks to achieve this objective by:

- Setting out that there is a need for the planning system to perform a number of roles, including an economic role, social role and environmental role (paragraph 8).
- Requiring that planning 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; are visually attractive as a result of good architecture; are sympathetic to local character and history including the surrounding built environment; maintain a strong sense of place; and, create places that are safe, inclusive and accessible (paragraph 130).
- 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 (paragraph 136).
- Section 16 of the NPPF deals with conserving and enhancing the historic environment. Paragraph 189 states that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.
- Paragraph 194 advises 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. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance'.
- Paragraph 195 states that 'Local planning authorities should identify and assess the
 particular significance of any heritage asset that may be affected by a proposal (including
 by development affecting the setting of a heritage asset) taking account of the available
 evidence and any necessary expertise. They should take this into account when considering
 the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the
 heritage asset's conservation and any aspect of the proposal.'
- Paragraph 197 states 'In determining applications, local planning authorities should take account of:

a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

c) the desirability of new development making a positive contribution to local character and distinctiveness'.

 Paragraph 199 states 'When 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 (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'.

- Paragraph 200 states 'Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:
 - a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
 - b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional'.
- Paragraph 201 states that 'Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:
 - a) the nature of the heritage asset prevents all reasonable uses of the site; and
 - b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
 - c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
 - d) the harm or loss is outweighed by the benefit of bringing the site back into use.
- Paragraph 202 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'.
- Paragraph 203 states that 'The effect of an application on the significance of a nondesignated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset'.
- Annex 2 of the NPPF provides a glossary of key terms which are relevant to the application. 'Significance' is defined 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. Significance derives not only from a heritage asset's physical presence, but also from its setting'.
- 'Setting of a heritage asset' is defined within Annex 2 as 'The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral'.

National Planning Practice Guidance

The government published guidance on advertisements via the National Planning Practice Guidance website on 6 March 2014 (Reference ID: 18b).

The guidance states: 'Advertisements are controlled with reference to their effect on amenity and public safety only, so the regime is lighter touch than the system for obtaining planning permission for development'.

The guidance goes on to state that 'local planning authorities [should] control the display of advertisements in the interests of amenity and public safety, taking into account the provisions of the development plan, in so far as they are material, and any other relevant factors'.

The Camden Local Plan (2017)

The Local Plan was adopted by the Council on 3 July 2017. It replaced the Core Strategy and Camden Development Policies as the basis for planning decisions and future development in Camden. The following policies are relevant to the proposal:

- Policy D1 'Design' advises that the Council seek to secure high quality design in development. Amongst other things, the Council will require that development, respects local context and character; preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage; is of sustainable and durable construction and adaptable to different activities and land uses; comprises details and materials that are of high quality and complement the local character; and integrates well with the surrounding streets and open spaces.
- Policy D2 'Heritage' advises that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings.
- Policy D4 'Advertisements' states that the Council will require advertisements to preserve or enhance the character of their setting and 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. The Council will support advertisements that:
 - a. preserve the character and amenity of the area; and
 - b. preserve or enhance heritage assets and conservation areas.

They will resist advertisements that:

- c. contribute to an unsightly proliferation of signage in the area;
- d. contribute to street clutter in the public realm;
- e. cause light pollution to nearby residential properties or wildlife habitats;
- f. have flashing illuminated elements; or
- g. impact upon public safety.

The Council will resist advertisements on shopfronts that are above fascia level or ground floor level, except in exceptional circumstances.

Camden Planning Guidance on Advertisements (2018)

This document was prepared by Camden Council to support the policies in the Camden Local Plan 2017. This guidance forms a Supplementary Planning Document (SPD) which is an additional 'material consideration' in planning decisions. This document should be read in conjunction with, and within the context of, the relevant policies in Camden's Local Plan.

The purpose of this guidance is to provide advice on the design and siting of advertisements so that they contribute positively to the appearance and character of an area. This guidance was formally adopted March 2018 and replaces the guidance in CPG1 Design (adopted July 2015).

The document 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. Interesting and unique styles of advertisements and signs will be considered acceptable where they are compatible with the host buildings and surrounding environment'. It goes on to advise that 'Generally advertisements will only be acceptable at fascia level or below. Advertisements above fascia level can appear visually obtrusive and unattractive and, where illuminated, they can cause light pollution to neighbouring residential properties. If an advertisement is required at high level for a specific business use then this will usually be restricted to non-illuminated images on windows'.

Paragraph 1.11 states 'Advertisements in conservation areas and on or near 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.'

Camden Planning Guidance on Design (2021)

The Council has prepared this Camden Planning Guidance (CPG) on Design to support the policies in the Camden Local Plan 2017. This guidance is therefore consistent with the Local Plan and forms a Supplementary Planning Document (SPD) which is an additional "material consideration" in planning decisions. This document was adopted on 15 January 2021 following statutory consultation and replaces the Design CPG (March 2019).

Detailed guidance is provided on a broad range of topics. The key messages set out within the document state that 'Camden is committed to excellence in design and schemes should consider:

- The context of a development and its surrounding area;
- The design of the building itself;
- The use and function of buildings;
- Using good quality sustainable materials;
- Creating well connected public spaces and good quality public realm;
- Opportunities for promoting health and well-being;
- Opportunities for improving the character and quality of an area.

In relation to advertisements and signs, the document states that: 'Shops and businesses need to ensure that their name and other details are clearly displayed on their premises and, as a result,

signs are among the most prominent forms of advertising on buildings. However, signs that are unsympathetically designed can cause significant harm to the building and the local townscape. Signs should relate well to the character, scale and architectural features of the building and respect their local context' (paragraph 6.28).

It goes on to state that 'Properties should only have one main fascia sign and one ancillary projecting or hanging sign per street frontage, although two projecting signs may be appropriate in cases of large shopfronts stretching across two or more shop units. Too many adverts/signs on a property contribute to visual clutter and can detract from the appearance of the street scene' (paragraph 6.29).

For the reasons identified below, it is considered that the proposal accords with the above planning policy guidance.

Planning and Heritage Appraisal

The key material considerations against which the proposed signage should be considered include: effect on amenity; and, effect on public safety. The relationship of the proposed signage with the building and its conservation area location are also important material considerations.

Principle of Signage

This application is for advertisement consent for the installation of an illuminated projecting sign. The sign will be installed above the main entrance to the 'Junkyard Golf' premises which is due to open imminently. The signage will be installed in the location of previous branding associated with the 'Shaka Zulu' premises but which has since been removed. The principle of signage in this location is therefore established, and the signage proposal is considered to be much more subtle than the branding associated with 'Shaka Zulu'.

The overall aim of the signage is to promote 'Junkyard Golf' in order to attract customers and ensure the premises can be located. This is particularly important given the need for the new 'Junkyard Golf' premises to become successful and established, as well as the varied commercial nature of Camden Lock Place and the presence of other businesses with distinctive signage.

The sign will be mechanically fixed to the building. It will comprise 5mm Opal 050 acrylic and will be internally illuminated by RGB LEDs. The acrylic panel will be mechanically fixed and bonded into a front panel and will feature black vinyl lettering to the face of the acrylic, to read 'Junkyard Golf Club'. There will be 3mm thick aluminium front panels, painted RAL 9005, black satin to form a 25mm wide border to all sides. Behind the projecting sign matt black 3mm dibonded panels will be installed to the existing building elevation with LED strip lighting incorporated.

As noted previously the site is in a central, Town Centre location which is characterised by commercial premises. Existing businesses already display various types of signage, including illuminated signage and signage at high level, thereby further confirming that the principle of the proposed signage is acceptable in this location.

Design, Visual Appearance, and Effect on Amenity

In accordance with national and local planning policy it is necessary to consider the impact of the proposed signage in terms of design and visual appearance, whilst the conservation area location further emphasises the importance of ensuring a proposal of high quality and sensitive design.

The bespoke signage has been designed to be appropriate to the proportions of the building façade and entrance area ensuring a visually pleasing appearance is achieved. The purpose of the design is to appear as subtle and understated, whilst still representing the youthful, vibrant and fun character of 'Junkyard Golf'.

The sign will be internally illuminated with feature strip LED lighting. This will ensure essential visibility in evening and night-time periods. The hours of illumination will coincide with the hours of operation of the premises and will be turned off when the premises are closed.

In summary, the proposed signage is high quality, will complement the appearance of the building and will be consistent with relevant provisions of the NPPF; Local Plan policies D1, D2 and D4; and provisions within the planning guidance on Design, and planning guidance on Advertisements.

Effect of Signage on Public Safety

Planning policy guidance states that new signage should not present any risk to highway or public safety.

The proposed signage will be installed on the external façade of the building. As shown by the submitted drawings the signs will be installed at a height / projection which will ensure there will be no obstruction to the footpath or highway.

There are numerous existing signs located on buildings / premises in the vicinity of the site and the proposed signage will not present a risk in terms of public safety, whilst there will be no implications for highway safety due to the pedestrianised nature of Camden Lock Place.

The provision of illumination around the building's entrance is considered to be beneficial in terms of public safety.

For the above reasons the proposal will not have an adverse impact on public safety and is consistent with provisions of the NPPF; Local Plan Policy D4; and the Camden Planning Guidance on Advertisements.

<u>Relationship of Proposed Signage to the Regents Canal Conservation Area and 'The Interchange</u> on North Side of Grand Union Canal including The Horse Tunnel and Stairs, Vaults and Canal Basin' (Grade II listed)

As noted previously, the proposed signage is of a carefully considered, high quality design and is appropriately positioned. The Building C, Camden Lock Place, is a modern building and the proposed signage will not have any direct heritage impact.

The signage will ensure that the entrance to 'Junkyard Golf' can be readily seen, helping customers to locate the premises, as well as attracting passing trade. This will contribute to the overall success of the venue which in turn is associated with economic benefits, as well as ensuring an active use which makes a positive contribution to the wider area.

In summary, due to the proposed location and design of the signage the proposal will not have an adverse impact on the building or the character and appearance of the Regents Canal Conservation Area. It will also not adversely affect the setting of the grade II listed 'The Interchange on North Side of Grand Union Canal including The Horse Tunnel and Stairs, Vaults and Canal Basin' which is visible at the west end of Camden Lock Place and already has intervisibility with signage of other commercial premises in the locality.

The proposal is therefore consistent with provisions of the NPPF; Local Plan policies D1, D2, D4 and provisions within the planning guidance on Design, and planning guidance on Advertisements.

In conclusion, the proposed signage will not have an adverse impact on amenity or public safety. It will assist in marketing 'Junkyard Golf' which is due to open imminently and ultimately contribute to its success by helping to attract customers. This will have a positive heritage impact for both the surrounding environment. As a result, the proposal is in accordance with relevant national and local planning policy guidance.

Submission Information

The following information has been submitted in support of the applications:

- Completed Application Forms for Advertisement Consent.
- Junkyard Golf External Signage document V5 brochure prepared by Widdsigns.
- Junkyard Golf External Signage Planning Elevation document V1 brochure prepared by Widdsigns.
- Site Location Plan (completed on the Planning Portal website).
- Signage location drawing.
- Existing elevation drawing (showing Shaka Zulu installation).

The above information has been submitted alongside the application forms via the planning portal. The application fee (amounting to £132) will be paid during submission of the application.

We look forward to receiving confirmation that the application has been validated. In the meantime, if you require any further information in order to determine the application please do not hesitate to get in touch.

Yours sincerely

Ralph Taylor BSc. MPLAN MRTPI Associate Director