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

**FAO Sam Fitzpatrick**

15 August 2023

Our Reference: 23/115  
Via PLANNING PORTAL

Dear Sam,

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)**

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

**40 WHITFIELD STREET, LONDON W1T 2RH**

**APPLICATION FOR FULL PLANNING PERMISSION AND ADVERTISEMENT CONSENT**

We write on behalf of our client, E&A West End Properties Limited ('the Applicant'), to formally submit an application for full planning permission and advertisement consent in accordance with the Town and County Planning Act 1990 (as amended) and Town and County Planning (Control of Advertisements) (England) Regulations 2007 for the above site.

This application seeks full planning permission and advertisement consent for the following development:

*"Alteration of ground floor elevation to the 40 Whitfield Street building entrance including replacement doors, an entrance canopy, installation of street numbering and wayfinding signage at fascia level."*

The proposals have been submitted as part of an overall strategy to improve the wayfinding and legibility of the building's entrance. Similar proposals have previously been approved by the Council under planning application reference 2022/3007/P and advertisement consent 2023/2457/A. This application would supersede these previous permissions and it has been submitted following the downsizing and reconfiguration of the Tesco Retail Unit, accessed off Goodge Street.

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
- Existing and Proposed Floor Plans and Elevation Drawings, prepared by BASE
- Existing and Proposed Views, prepared by BASE

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## a. The Site and Relevant Background

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### The site

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 Goodge Street. An existing Tesco Metro retail unit is provided on the Goodge Street/Whitfield Street corner. The entirety of the building is being used for, and falls under, a general Class E commercial use.

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

**Figure 1: Site Location Plan**



### Planning Background

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.

Importantly, this permission did not have any restrictions over land uses and, as a result of the amendments to the Use Classes Order in 2020, the entire building now benefits from an open Class E use. This permission remains the operative permission to this day.

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. Advertisement consent was also granted for building numbering signage to this new entrance in July 2023 (LPA ref. 2023/2457/A).

In July this year, Tesco announced that they would be reconfiguring their unit and opening a smaller store. This was confirmed in the following link <https://fitzrovia.com/2023/07/07/goodge-street-tesco-to-become-a-smaller-store/>

The store is now closed and reconfiguration works are underway.

As part of this reconfiguration, the Whitfield Street service entry door at this location is redundant.

Given the above, the Applicant no longer wishes to implement 2022/3007/P and 2023/2457/A. They have instead tasked the design team to revise the design to create a legible and inviting entrance to using the existing openings at the southern end of the building rather than through the new entrance previously permitted.

### **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**

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The proposed development seeks full planning permission and advertisement consent for the creation of a new building entrance at the southern end of the Site. This would include the installation of street numbering and wayfinding signage at fascia level, replacement doors and a new canopy.

The proposed works can be summarised as follows:

- Replacement of the existing doors at the southern end of the site with a new glazed entrance door and aluminium cladded entrance door.
- Installation of a new glass canopy structure above to match the materiality and design of the same structure at the Site's northern entrance.
- Removal of a section of the balustrade.
- Existing concrete paving to be replaced with a stone slab with non-slip inserts to match existing finish at the northern end of the Site.
- Existing drop kerb removed and kerb and paving re-instated.
- New building identification signage 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
- Powder coated stainless steel to be finished in jet black (RAL 9005)
- No lighting proposed.

#### Vinyl Signage

- Located 2.47m 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.

#### Bicycle Silhouette

- Applied to bottom part of the aluminium door with mid grey vinyl.

#### Bicycle Motif

- Located 1.75m above ground level
- 268mm H x 454 mm W x 25mm D
- Powder coated stainless steel to be finishes in jet black (RAL 9005)
- No lighting proposed.

The proposals relate to the building entrance and identification signage only. This application does not concern any internal works which are outside of the scope and consideration of this application.

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

### **c. Planning Policy Assessment**

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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).

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.

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

### **Principle of Development**

While the proposed development does not seek any changes in land use, it is noted that the proposal would 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, 20<sup>th</sup> century buildings. It notes a variety of brick and render as being the predominant materials. The Appraisal also notes that opportunities to enhance the public realm should be taken and ensure that historic details are retained.

#### **Assessment**

The alterations sought by the proposed development would see replacement of the existing doors at the southern end of the site with a new glazed entrance door and aluminium clad entrance door.

A new glass canopy structure would also be installed above to match the materiality and design of the same structure at the Site's northern entrance.

The proposed works would greatly improve the relationship of the building with the street and also result in increased symmetry and consistency of the ground floor façade in terms of materiality, finishes, and design.

The proposed development would also see the removal of a portion of the metal rails along the frontage of the site and see the provision of new paving at ground floor level to match with the finishes along the public highway and footpath. These changes would help improve the ground floor entrance experience to the building and provide an improvement to the pedestrian experience along this section of Whitfield Street.

In addition, 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. Wayfinding signage is also proposed to the adjoining new end of journey entrance. 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 typology 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 new entrance application 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 D1, D2, and D4 the Local Plan.

## **Access**

Policy D1 'Design' of the Local Plan seeks high quality design which includes design that is inclusive and accessible for all. Supporting text notes that any adaptation of existing buildings must respond to access needs whilst ensuring that alterations are sympathetic to the building's character and appearance.

Policy C6 'Access for All' of the Local Plan promotes fair access in developments and expects all buildings to meet the highest practicable standards of accessible and inclusive design so they can be used safely, easily and with dignity by all.

The changes proposed would still see level access provided to all of the building via the main entrance on Whitfield Street. The new entrance would also provide secondary level access into the building. This would allow the office accommodation to continue to be accessible to and used by all in accordance with Policy D1 and C6 of the Local Plan.

#### **d. Summary**

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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 ( [REDACTED] ) or [REDACTED] of this office in the first instance.

Yours sincerely,

A handwritten signature in dark ink that reads "Iceni Projects Ltd." in a cursive, slightly stylized font.

Iceni Projects

ENC. As listed above.