

Our Ref: VH/KN0047/23

10 October 2023

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

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Dear Sir / Madam,

Royal National Hotel 38-51 Bedford Way, London WC1H 0DG
Application for Advertisement Consent
Planning Portal Reference PP-12119902

We are instructed by Imperial London Hotels Ltd. to submit this application for advertisement consent for a scheme of signage at the above site.

Specifically, the application proposes:

"A scheme of illuminated signage."

The application has been submitted online via the Planning Portal and in addition to the completed forms, comprises the following:

- Site Location Plan;
- Development Document Rev. D
- East Elevation Canopy Fascia - GBS003-01007 Rev. D
- East Elevation Wall Sign - GBS003-01009 Rev. D
- West Elevation Canopy Fascia - GBS003-01008 Rev. D
- West Elevation Hanging Sign - GBS003-02004 Rev. D
- External Photo Pack.

This letter forms part of the application and should be read in support of it.

Background

The Royal National Hotel is a prominent, large and well known hotel within the borough of Camden and the ward of Bloomsbury. As part of a rebranding and updating exercise the applicant is proposing a new scheme of signage that simplifies, refines and streamlines the branding and wayfinding signage on site.



Site and Surrounds

The Royal National Hotel is a large hotel building extending to 8 floors with circa 1600 rooms, it has been in operation for almost 100 years. The building forms a block development between Bedford Way and Woburn Place with entrances on both elevations. Directly adjacent to the north is the Tavistock Hotel.

The application site falls within Bloomsbury and within a highly urbanised and busy location. Both Bedford Way and Woburn Place are busy through routes of the city and have high levels of both vehicular and pedestrian traffic.

The area surrounding the hotel is mixed in nature, with many restaurants, cafes and shops at ground level with residential or hotel accommodation above, there are also a number of education and public buildings within close proximity. The hotel itself has a number of retail outlets and restaurants at ground floor level, including car rental offices and convenience stores, there is also a pub. Further afield Russell Square is to the south of the hotel and Tavistock Square sits to the north.

In terms of designations, the hotel falls within the Bloomsbury Conservation Area as well as the Central London Area as allocated by the Camden Local Plan.

Planning History

21-01-1993 **9280221**

The display of banners measuring 5700mm x 1000mm at 6000mm above ground level: 5 banners on each of the Bedford Way & Woburn Place elevations and 4 banners on the courtyard elevation as shown on drawing numbers 8 112C 173A 177A SK`A` SK`B` SK`C` SK`D` SK`E`. SK`F` & SK`G`.

29-08-1996 **A9601953R1**

Display of an internally illuminated fascia and internally illuminated projecting sign measuring 912 mm x 600 mm, as shown on drawing nos. BUD 03/001 H, 003 B.

09-01-1998 **PS9705156**

Installation of two canopies mounted at ground floor level and removal of brise soleil on existing frontage. (as shown on drawing nos. 131/2 REV A, 128/2 REV A & 6000/11/ REV B)

29-06-2015 **2015/2491/A**

Display of 1 x internally illuminated fascia sign and 1 x non-illuminated hanging sign.

17-11-2016 **2016/3593/A**

Display of 1 x externally illuminated fascia sign and 1 x externally illuminated hanging sign to restaurant (A3 use class)

15-06-2021 **2020/2686/A**

Display of 1 x fascia sign, 1x externally illuminated projecting signs and awnings.



27/4/2023 2022/3560/P

Removal of existing front canopy, installation of new front facade treatment and new street entrance and associated works

Proposal

This proposal seeks to provide clear and high-quality signage that is both in line with hotel branding and sympathetic to its surroundings and host building. The current signage is somewhat tired and dated and as such consent is sought for a new scheme that will bring the external branding and signage up to date.

Consent is sought for 5 No. signs across the east and west elevations. The east elevation will house two new signs and the west will house three. As part of this work several signs will be removed, this will serve to 'tidy up' and simplify the external look of the building as a whole.

Removed Signs

The following signs will be removed from the hotel;

East Elevation – All signage will be removed, including the large vertical sign and the large ship logo.

West Elevation – Most signage will be removed, including the blue fascia signage that runs the length of the hotel. The Green Internally illuminated sign will be removed, along with the unlit small parking sign. The 'P' sign indicating parking will remain in situ.

Proposed Signs

East Elevation

Sign one – Canopy Fascia sign

This sign will replace the existing signage that sits above the undercroft entrance, it will be flush to the existing overhang and will be internally illuminated. The sign will be finished in dark blue RAL 5011 with yellow RAL 1018 detailing. The letters are individual and internally illuminated, full technical details of the letter construction is included within the submitted drawing pack.

The sign will be circa 17 metres in length, extend to circa 2 metres in height with an extension of 1.6 metres at each end.

Sign Two – Wall Sign

The sign will replace the existing sign and will match the proposed fascia sign in design and branding. The sign will be circa 2.4 metres in height and 2 metres in width. It will feature internally illuminated individual letters and will be finished in blue and yellow to match the proposed scheme.



West Elevation

Sign Three - Hanging Sign

This sign will mirror eastern elevation in design and colour and will sit over the undercroft entrance, underneath the existing concrete fascia. This sign will be internally illuminated with individual letters. It will be circa 6.2 metres in length and circa 1 metre in height.

Signs Four and Five – Individual letter signs on concrete canopy

These signs are identical in design they are however, handed for each elevation. The signs will be attached the existing concrete canopy, which will be cleaned and left bare. One sign will be installed on either end of the existing canopy, replacing the existing 'HOTEL' signs.

Full and exact measurements for all proposed signs can be found on the submitted drawings. All signs will be constructed of 3mm aluminium with acrylic lettering.

Planning Policy

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states: "if regard is to be had to the development plan for the purposes of any determination to be made under the Planning Act, the determination must be made in accordance with the plan, unless material considerations indicate otherwise." Any issue that relates to the use and development of land is capable of being a material planning consideration; this includes Government statements of planning policy.

The development plan applicable to the application site consists of the Camden Local Plan, adopted 2017, the Camden Site Allocations document adopted 2013 along with the accompanying Policies Map and the London Plan 2021. The National Planning Policy Framework is also a material consideration

Camden Local Plan

Policy D4 is concerned with advertisements and states that proposals for new advertisements should preserve or enhance the character of their setting and host buildings. In relation to conservation areas, this policy states that the Council will support proposals that preserve or enhance these areas.

Heritage issues are dealt with under **Policy D2**. This policy states that when determining applications, within conservation areas the Council will require that proposals preserve, or where possible, enhance the appearance of the area.



London Plan

Policy D8 of the London Plan is concerned with public realm and states at point B that lighting, including advertisement lighting, should be designed in order to minimise intrusive lighting and reduce light pollution.

Policy HCl states that development proposals affecting heritage assets should be sympathetic to the assets significance. It further states that development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early in the design process.

NPPF

Paragraph 136 provides guidance regarding signage and states “*advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts*”.

Section 16 of the NPPF is concerned with the conservation of the historic environment, it sets out at **Paragraph 194** that applicants are required to describe the significance of any heritage asset effected by proposals and that the level of detail should be appropriate to understand the assets importance and sufficient to understand the potential impact of the proposals on the significance of the asset.

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

Planning Assessment

The principle of illuminated signage at this hotel is long established and is acceptable in planning terms. The proposed scheme seeks to improve and simplify signage and provide a solution that is in keeping with the host building and the surrounding conservation area, whilst promoting the branding principles of the hotel.

This scheme has been designed to bring the hotel up to date by utilising modern signage engineering and good design. The western elevation will see a significant improvement in visual amenity in that the blue fascia will be completely removed and replaced with a much smaller canopy sign. Similarly, the eastern elevation will see the removal of a large vertical sign and the installation of two smaller and high quality signs, this will be a significant improvement in visual amenity.

Those determining applications for advertisement consent should only seek to control proposals in the interests of amenity, safety and cumulative impacts. This proposal has a positive impact on amenity, poses no safety risk and seeks to reduce visual clutter; as such it is fully policy compliant.

Heritage Assessment

The application building falls within the Bloomsbury Conservation Area. In order to comply with government guidance contained in the NPPF, it is necessary for the application to be supported by a



heritage assessment that considers and assesses the impact of the proposed development on the Conservation Area.

Bloomsbury Conservation Area

The proposal site falls centrally within the Bloomsbury Conservation Area, which is a large, busy and highly developed district of London. This Conservation Area envelops several districts, including Fitzrovia, Finsbury and Clerkenwell, and is home to a number of hospitals and university buildings as well as the British Museum.

The significance of this Conservation Area is derived from its streetscape, including the street pattern as well as its evolving use over time. The appraisal notes that much of the significance of the area comes from its regular grid pattern of streets established in Georgian times as well as the Georgian architecture and its associated scale.

The proposal site falls within the 'Tavistock Square' area of the conservation area and its appraisal notes that to the north of Russell Square is a prevalence of hotel uses. It further notes that Bedford Way retains little of its original character. The following is noted regarding the Royal National Hotel:

'The monolithic form and repetitive elevational treatment of the National Hotel dominates the eastern side of the street and provides a relatively unattractive edge dominated by a central coach turning and drop-off point. The hotel occupies the depth of an entire street block with the principal seven storey frontage dominating the west side of Woburn Place. The monotonous and continuous brown brick façade, punctured by a series of square windows, creates a strong sense of enclosure opposite the equally tall buildings on the east side of the street.'

The appraisal has a section regarding the control of advertisements and notes that illuminated signage can have a major impact in conservation areas and that the proliferation of signage, even that of good design, could harm the character of Bloomsbury Conservation Area.

We consider that the installation of the proposed signage, taking account of the removal of the majority of existing signs, will not inflict harm on the significance of the Conservation Area and therefore the proposal is fully compliant with the tests set out within chapter 16 of the NPPF, specifically paragraph 202.

Specifically, the proposal will not increase the levels of illuminated signage in the area and will therefore not increase its proliferation and as such the proposal accords with the points made within the conservation area appraisal.

Conclusion



The proposed signs are of an appropriate scale and are proportionate in size and scale to the hotel. The current signage has been in place since for some time and is therefore tired and in need of replacement.

The above assessment demonstrates that the proposed signage is not detrimental to either local amenity or public safety and as such it accords with both local and national policy. Furthermore, the scheme is acceptable from a heritage perspective as it has been demonstrated that it will not cause harm to the significance of the Conservation Area.

The planning fee for this application is £132 plus £64 service charge for the use of the Planning Portal, in this regard the sum of £196 has been paid directly to the Planning Portal.

The applicant wishes to work closely with the Council on this proposal and as such, if you have any queries regarding the submission or require any additional information, please do not hesitate to get in touch.

Yours faithfully



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