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Submission via Planning Portal - PP-12727776

22 January 2024

My Ref: 22039

Dear Sir / Madam

Town and Country Planning Act 1990 (As Amended)

Application for Advertisement Consent for the installation of externally illuminated fascia sign (strip light), projecting sign and awning

28 Goodge Street, London, W1T 2QQ

This letter is submitted to accompany the application for Advertisement Consent for the installation of externally illuminated fascia sign (strip light), projecting sign and awning at 28 Goodge Street, London, W1T 2QQ.

The application consists of the following documents in addition to this letter which also forms a planning and heritage statement:

- Application Form
- Site Location Plan
- 577-28GST-001 Existing Site Plan
- 577-28GST-002 Existing Block Plan
- 577-28GST-020 Existing Front Elevation and Section
- 577-28GST-022 Previously Approved (Under Construction) Front Elevation and Section
- 577-28GST-100 Existing, Approved (Under Construction) and Proposed Ground Floor Plan
- 577-28GST-200 Proposed Front Elevation and Section
- 577-28GST-500 Proposed Projecting Sign Detail

Site Location and Description

The site is located on the northern side of Goodge Street and consists of a retail unit which was formerly used as a dry cleaner and is currently being converted into a sui generis mixed-use coffee shop/cafe and beauty salon

The retail unit includes a basement and ground floor level with 3 storeys of flats above.

The site is accessible by sustainable forms of transport and is 160m from Goodge Street Underground station. In addition, regular bus routes pass close to the site along Tottenham Court Road.

Planning History

The planning history can be summarised as follows:

- 2019/3528/P Change of use of ground floor and basement retail unit (Class A1) to a cafe restaurant (Class C3) including installation of air extract equipment to the rear | Withdrawn
- 2003/0964/P Change of use of 1st, 2nd and 3rd floors from office use to residential, and conversion to 1 self-contained bedsit flat and 1 2 bed, self-contained maisonette. | Approved
- 9000503 Retention of a new shopfront as shown on drawing number SK1 | Approved
- 17595 Erection of a rear extension on basement and ground floor levels of 28 Goodge Street, W1 | Approved

Most recently planning permission was granted on 27th March 2023 for 'change of use from Class E (dry cleaner) to a sui generis mixed-use coffee shop/cafe and beauty salon and associated alterations including replacement rooflight to rear, replacement of shopfront window and door, and extension to glass block pavement lights to front of the unit' (Ref: 2022/3086/P).

Further to this planning permission was granted on 15th November 2023 for installation of 1x ASHP condenser unit on rear roof.

The proposed development sought by this application is in conjunction with the change of use and new shopfront which is currently being implemented.

Proposed Development

The proposal seeks advertisement consent for an externally (strip light) illuminated fascia sign, a projecting sign and an awning.

For full details of the proposal, please see the accompanying plans.

Development Plan Context, Designations and Material Considerations

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications should be determined in accordance with the provisions of the Development Plan unless material considerations indicate otherwise. This represents the starting point for assessing the development prospects for a particular site or property.

The Development Plan context is provided by the London Plan (2021) and the Camden Local Plan (2017) along with the Fitzrovia Area Action Plan (2014).

The Proposals Map confirms that the site is within the Charlotte Street Conservation Area and also within the Goodge Street Neighbourhood Area and Central Activities Zone.

The following policies of the London Plan have been identified as relevant:

- D4 Delivering good design

- HC1 Heritage conservation and growth

The following policies of the Local Plan have been identified as relevant:

- D1 Design
- D2 Heritage
- D3 Shopfronts
- D4 Advertisements

These are discussed below, where relevant.

The Government's National Planning Policy Framework (2023) is a material consideration in the assessment of development proposals. The Framework confirms that the purpose of the planning system is to contribute to the achievement of sustainable development.

Of key relevance is paragraph 136 which states that 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.

In addition, the Camden Planning Guidance on Adverts (2018) is also relevant to the determination of the application, as is the Camden Planning Guidance on Design (2021).

Planning Considerations – Design and Heritage

In respect of design considerations NPPF confirms that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

In this respect the NPPF offers support to the proposed development which will have no detrimental impact on the character of the area and does not propose any additional buildings, only high quality advertisements on an already approved shopfront.

London Plan Policy D4 seeks to deliver good design and Local Plan Policy D1 seeks to secure high quality design in development.

In addition, Local Plan Policy D3 states that the Council will expect a high standard of design in new and altered shopfronts, canopies, blinds, security measures and other features.

In this respect, the proposed development seeks only advertisement consent for an already approved shopfront and proposes advertisements, illumination and an awning similar in appearance to others in the local area. This is discussed in more detail below.

Specifically referring to advertisements, Local Plan Policy D4 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. The Council will support advertisements that preserve the character and amenity of the area; and preserve or enhance heritage assets and conservation areas.

In addition, the Adverts CPG expands on the aims of Policy D4 and states that illuminated signs will be acceptable where they are sympathetic to the building and the level of illumination is in accordance with Institute of Lighting Engineers (PLG05) 'The Brightness of Illuminated Advertisements' (which would be 600cd/m² in this location). Banner signs will be considered acceptable in some commercial areas where they safeguard the amenity, character and appearance of the area.

In this respect, the proposed development seeks only an externally illuminated fascia with a strip light and will be illuminated by a low energy warm white 3000k LED which will be discrete in the street scene and only provide lighting to the fascia sign.

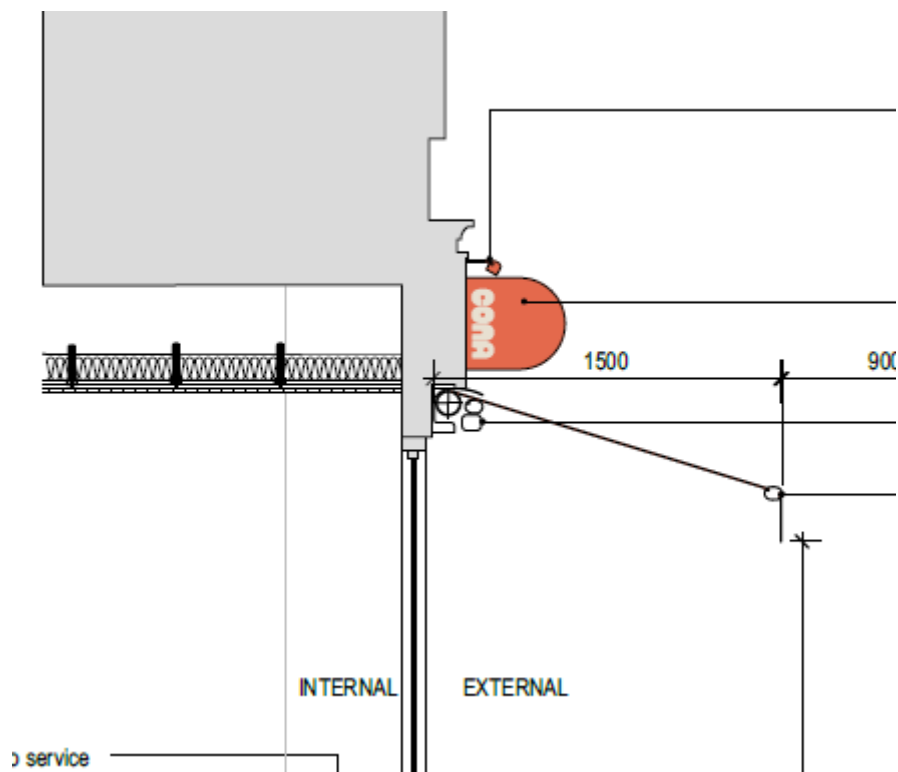
In addition, the Design CPG provides further guidance on advertisements. This requires signs to be sympathetically designed and relate well to the building.

Guidance is provided in relation to fascias and in this respect it is noted that the fascia already has planning consent. This application only seeks approval for the illuminated signage on the approved fascia.

In relation to projecting signs the Design CPG confirms that:

Projecting and hanging signs should normally be level with the fascia rather than below or above it. They should be positioned to the side of the shopfront at fascia level.

In this respect, as shown below, the projecting sign is at fascia level and is located to the right-hand side of the shopfront.



The Design CPG states that confirms that awnings should be retractable, of traditional canvas, have the blind box integrated into the design, be attached between the shopfront and fascia, of a width appropriate to the shop front and be flush with the fascia level.

As shown on the above extract and on the submitted drawings this is the case with the proposed.

The site lies within the Charlotte Street Conservation Area and in this respect Local Plan Policy D2 requires that development within conservation areas preserves or, where possible, enhances the character or appearance of the area. In addition, London Plan Policy HC1 states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.

The National Planning Policy Framework (paragraphs 195-214) seeks to ensure that proposals affecting a Heritage Asset first make an assessment of the impact of the proposal on the significance of the asset and should be granted if there is no harm to the significance. 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 there are substantial public benefits that outweigh that harm or loss.

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 securing its optimum viable use.

In this respect, in accordance with the NPPF it is clear that the approach in determining applications affecting a Heritage Asset is as follows:

- Assess the significance of the Heritage Asset.
- Assess the impact of the proposed development on the significance of the Heritage Asset.

In this respect the Charlotte Street Conservation Area Appraisal and Management Plan confirms that the Georgian townhouses are typically brick built in a yellow stock brick and are four storeys fronting the main streets such as Goadge Street.

The Appraisal considers the application property to be a positive contributor to the Conservation Area. However, the building is not a shopfront of merit with all of the positive shopfronts being on the opposite side of the street. Furthermore, the shopfront is in the process of being replaced in accordance with the approved permission 2022/3086/P.

In this respect, the approved shopfront will enhance the significance of the Conservation Area.

The application site is located on a commercial street with active frontages at ground floor level, with many including illuminated signage and awnings, as well as projecting signs.

This is shown in the below photographs.







The proposed fascia sign is proportionate to the scale of the shopfront. The lettering is modest and in keeping with that found elsewhere on the street.

The projecting sign is modest in size, simple in design and is in line with the fascia.

The awning is discreetly located between the fascia and the shopfront, and its housing is in line with the fascia above.

Only the fascia is to be externally illuminated, as discussed above.

The site is in a commercial location whereby illumination of advertisements is prevalent and therefore the proposed internally illuminated signage would not have a negative impact on the character and appearance of the area or on the public realm and respects the character and appearance of the building and the surrounding area. Consequently, the proposals will have no demonstrable impact on the significance of heritage assets in this location.

Planning Considerations – Amenity

Local Plan Policy D4 requires that advertisements should not cause light pollution to nearby residential properties or have flashing illuminated elements.

The proposed development seeks only external illumination on the fascia, and this consists of a low energy warm white 3000K LED discrete strip sign light to illuminate the shop sign.

The site is located in a busy commercial street whereby illumination of advertisements is common (as shown in the photographs above).



The proposed light will only illuminate downwards over the fascia and will not provide any additional illumination.

Therefore, the proposed externally illuminated fascia sign would not have a material impact on the amenity of any neighbouring occupiers beyond the existing situation.

For the reasons outlined above the proposed works will have an acceptable impact on amenity of the area and neighbours and complies with Policy D4 of the Camden Local Plan.

Planning Considerations – Public Safety

Local Plan Policy D4 requires that advertisements do not impact on public safety.

The proposed advertisements are at fascia level and the awning is the same height as on other nearby shops and restaurants in an area with other similar advertisements on many of the commercial units.

In this respect, the proposed development is not considered to pose any public safety issue and does not present a distraction to highway users.

Therefore, no conflicts with Policy D4 are identified.

Summary and Conclusion

The above confirms that the proposed development is well designed and in keeping with the character and appearance of the building and surrounding area, including the Conservation Area.

The proposed development will not result in any amenity or public safety impacts.

An assessment of the relevant planning policies in the adopted Development Plans confirms that there is no significant conflict with their provisions and that the statutory test imposed by Section 70(2) of the Town and Country Planning Act and Section 38(6) of the Planning and Compulsory Purchase Act 2004 is met.

The proposal is therefore promoted on this basis and that it can be supported and receive a grant of advertisement consent.

If there are any queries or further information is required, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in blue ink that reads 'Jeremy Butterworth'.

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