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Date: 15/02/2024

Development Management
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Dear Sir/Madam

PROPOSED INSTALLATION OF REPLACEMENT FASCIA SIGN AND PROJECTING SIGN AND SINGLE DOWNLIGHTER AT BOUNCE, 121 HOLBORN, LONDON, EC1N 2TD

We enclose an application on behalf of our Client, State of Play Hospitality, for advertisement consent for the above proposed signage scheme, along with the requisite fee.

Site and surroundings

The application site is located on the north side of Holborn on the corner with Leather Lane to the east and Hatton Garden to the west. The site is adjacent to Holborn Circus in the Central London Area and forms part of the Holborn Central London Frontage. The site is within the Hatton Garden Conservation Area.

Bounce table tennis venue occupies principally the basement of the 9-storey building, with its customer entrance on the Holborn frontage, adjacent to retail units.

The surrounding comprises a mix of uses, primarily commercial, retail, food and drink venues and leisure.

There is a rich mix of commercial signage displayed in the locality and the proposed signage replicates many others in terms of scale, type and method of illumination.

The site is located within a highly accessible area and lies within the designated Central Activities Zone (CAZ), in close proximity to Chancery Lane Underground Station. The site has a PTAL rating of 6b (the very highest accessibility).

Proposals

We are seeking permission for two new replacement fascia level signs on the shopfront, as follows:

- 1 x replacement internally illuminated fascia sign comprising 6 x individual letters above the main entrance to the unit and
- 1 x internally illuminated 'blade' projecting sign at fascia height
- 1 x downlighter to replace existing spotlight

The proposed signage is fully detailed within the accompanying application drawings. Materials match those existing, which were granted advertisement consent on 12 November 2012 (LPA Ref: 2012/4853/A).

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The proposed branded canopy and menu sign benefit from deemed consent by Class 5 of the Advertisement Regulations.

Assessment

The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (hereafter 'the regulations') require the Local Planning Authority to only consider two issues with regard to advertisements; namely the interests of amenity and public safety. This is also replicated within para 141 of the NPPF (2023) which states that "*Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.*"

In considering the impact on amenity, the effect of the adverts on the appearance of the immediate neighbourhood, where residents or passers-by will be aware of the advertisement, must be taken into account. Given its positioning on Holborn, the signage will be clearly visible to pedestrians and other users of these routes. However, the proposed signage has been designed to be in keeping with the existing commercial character of the wider host building and the local area in general. The signage proposals are thought to be visibly compatible with the contemporary appearance of the building's frontages along these streets.

The proposals are considered to be supported by the requirements of the 2023 National Planning Policy Framework. The 2023 Framework reiterates the presumption in favour of sustainable development (paragraph 11) which requires development proposals that accord with an up-to-date development plan to be approved without delay. Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, permission should be granted unless in conflict with the 2023 Framework.

The 2023 Framework also requires LPAs to approach decisions on proposed development in a positive and creative way and to work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible (all paragraph 38).

The 2023 Framework requires planning policies and decisions to help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development (paragraph 85).

The 2023 Framework requires planning policies and decisions to promote social interaction and opportunities for meetings between people who might not otherwise come into contact with each other (paragraph 96). The 2023 Framework adds that in order to provide the social and recreational facilities and services the community needs, planning policies and decisions should plan positively for the provision and use of shared spaces and meeting places, such as public houses (paragraph 97).

The 2023 Framework states that good design is a key aspect of sustainable development (paragraph 131). Planning policies and decisions should ensure that developments function well and add to the overall quality of the area; are visually attractive; are sympathetic to local character and history, while not preventing or discouraging appropriate innovation or change; and create attractive, welcoming and distinctive places (all paragraph 135).

Specifically with regard to advertisements, the 2023 Framework states that the control of advertisements 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 (all paragraph 141).

It is also considered that the signage proposals do not conflict with any relevant adopted local planning policy for this site.

The proposed signage scheme will be essentially ephemeral in nature and will not result in any significant or material impacts upon the character and appearance of the host building and it is considered to be appropriate in nature and scale. Proposed materials match those previously consented at the application site.

Illumination of the proposed signage scheme is considered to be both reasonable and justified for the premises, given the trading hours and the nature of the applicant's business, which will include evening and night-time trade. The scale, type and method of illumination of the proposed signage replicates existing signage lawfully displayed upon other units in the vicinity.

The relevant considerations for determining proposals for advertisement consent comprise visual amenity and public safety only. Visual amenity is not only related to the aesthetics of the specific signage but must relate to visual considerations of the surrounding area, including any detriment caused by loss of investment to commercial buildings and their external appearance. The 2023 Framework is clear that the control of advertisements 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.

The signage proposal is an essential part of the applicant's strategy to attract custom to ensure the economic viability of the new operation at this commercial property. The signage is necessary in order to help attract custom for the new venture and facilitate the continuing economic health of the beneficial use of these premises for its appropriate town centre use. The proposed signage scheme would help to facilitate the appropriate new use of these premises for a use which will continue to add to and enhance the vitality and pedestrian footfall within the local street scene.

The use of the application premises is also an important commercial facility, providing a highly accessible, commercial leisure venue.

The proposed lighting will be discrete, and the size of the lettering is in proportion to the detailing elsewhere on the building, ensuring that there would be no harm in this regard. The materials and colours will also be compatible with the character of the host building and the wider street. With this in mind, the signage is not considered to look out of place and will not result in any harm to the character of the area.

In considering public safety, the impact of the signs on the safe use and operation of any form of traffic or transport, including the safety of pedestrians, must be taken into account. The behaviour of drivers of vehicles who would see the advertisement must be considered and regard made, to the possible confusion with traffic or other signals. The Institution of Lighting Engineers Technical Report Number 5: Brightness of Illuminated Advertisements (2001) provides guidance for maximum luminance and suggests that in city centre locations, with high levels of night time activity, illuminated areas up to 10m² should have a maximum luminance level of 600 cd/m². The adverts will be c40 cd/m² and therefore the brightness would not distract road users.

The advertisements would not cause harm to the safety of pedestrians. There are also no highway signs which the proposal may interfere with and the proposal is not considered to have an adverse impact on the safety and operation of the adjoining public thoroughfare.

For all of the reasons rehearsed above, the application proposals are not considered to result in any genuine, material implications to the visual amenity of the local area, the appearance of the host building or the character and appearance of the local street scene.

It is therefore considered that these signage proposals are actively supported by the 2023 National Planning Policy Framework and do not conflict with the general aims and aspirations of adopted local planning policy context.

In conclusion, it is considered that the proposed signage would not result in harm to visual amenity or public safety. These signage proposals will help ensure the continued economic use of this site and its continued function as an appropriate commercial use, which adds to the vitality and viability of the local area in general without compromising the visual amenities of the wider area.

In the above circumstances, it is hoped that officers can support these signage proposals.

If you need any clarification of the proposals or require any further information, please do not hesitate to contact us.

Yours faithfully,

Bidwells LLP

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