

Development Management  
Regeneration and Planning  
London Borough of Camden  
Town Hall  
Judd Street  
WC1H 9JE

**Date:** 22 July 2024

**Our ref:** 64743/04/SSL/BG/32495349v1

Dear Sir/Madam,

**100-106 New Oxford Street, London, WC1A 1HB**

## **Application for Advertisement Consent**

On behalf of our client, 100 Nox SARL (hereafter referred to as ‘the Applicant’), Nathaniel Lichfield & Partners (‘Lichfields’) is pleased to submit an application seeking advertisement consent for the installation of painted graphics to the rear ground level façade of 100-106 New Oxford Street, London, WC1A 1HB (‘the Site’) which will act as wayfinding for vehicles and cyclists.

## **Application Submission**

This advertisement consent application has been submitted via the Planning Portal (ref. PP-13252232), and comprises the following documents:

- Completed Application Form;
- This Covering Letter containing a proportionate assessment against relevant planning policy, prepared by Lichfields;
- Site Location Plan (ref. PL.602), prepared by Spratley & Partners; and,
- Existing and Proposed Elevations (ref. PL.601), prepared by Spratley & Partners.

The application fee of £578 (+ £70 service charge) has been paid online via the Planning Portal.

## **Site Context**

The Site is outlined in red on the accompanying Site Location Plan (ref. PL.601), comprising the rear (northern) elevation of 100-106 New Oxford Street facing onto Bainbridge Street - a tertiary road connecting from Dyott Street to New Oxford Street which is commonly used for servicing. Bainbridge Street provides access to the building for vehicle users via a car lift with sliding door, and a separate door leading to the cycle storage area.

100-106 New Oxford Street is an existing office building with various commercial tenants in occupation within the ground floor frontages. The existing building which will be subject to the painted graphics is not statutorily listed but is located within the Bloomsbury Conservation Area.

The immediate and wider area reflects a concentrated town centre offer typified by retail, leisure, food and beverage, and office uses. The Bainbridge Street elevation is the 'back' of the building and faces the backs of several other buildings. Its use for servicing means its environmental quality is varied, and its legibility and wayfinding lacking. The proposed advertisements are intended to improve visual appearance at the buildings vehicular and cyclist entrance, whilst providing clear and obvious wayfinding to those specific users.

## **Proposed Advertisements**

This application seeks advertisement consent to display two painted graphics as follows:

- Car graphic – a red super-graphic of 1,000 mm by 1,245 mm displaying a car symbol which will be painted onto the building façade adjacent to the car lift entrance door.
- Cycle graphic – a red super-graphic of 2,100 mm by 2,177 mm displaying a cyclist symbol which will be painted onto the building façade adjacent to the door to the cycle storage area.

The advertisements are intended to aid wayfinding for users of the building by identifying the entrances for cars and cyclists respectively. They have a uniform colour palette (RAL 3013 Tomato Red), will not project from the façade, and will not be illuminated.

## **Legislative & Policy Context**

While the proposals comprise exterior painting of a building which is permitted under Schedule 2, Part 2, Class C of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), this is not permitted “*if the painting is for the purpose of advertisement, announcement or direction*”, and so the rights do not apply in this case. Therefore, this application seeks express consent for the advertisements.

The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (‘the Regulations’) set out how applications for advertisements must only be determined against public safety and amenity considerations (Paragraph 3).

Consistent with this, Paragraph 141 of the National Planning Policy Framework (NPPF) states that:

*“The quality and character of places can suffer when advertisements are poorly sited and designed... Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.”*

The Camden Local Plan (2017) Policy D4 (Advertisements) states that the Council will support advertisements that preserve the character and amenity of the area and preserve or enhance heritage assets and conservation areas. In contrast, they will resist advertisements that contribute to an unsightly proliferation of signage in the area; contribute to street clutter in the public realm; cause light pollution to nearby residential properties or wildlife habitats; have flashing illuminated elements; or impact upon public safety.

Camden Planning Guidance on Design (2021) notes that unsympathetically designed signs can cause significant harm to a building and local townscape, while too many signs can cause visual clutter and detract from the street scene. As such, signs should relate well to the character, scale and architectural features of the building and respect their local context.

## **Assessment of Proposals**

### **Public Safety**

The proposed graphics seek to signpost the entrances to the office building for vehicle users and cyclists. This is intended to improve wayfinding and signal where cars and cyclists will be entering and leaving the building. The graphics will be painted onto the building façade and will therefore not project over or cause any obstruction to the footway or highway, any other traffic signage, nor hinder the operation of security/surveillance devices. They are non-illuminated and so will cause no unsafe distraction to drivers or other passersby.

Overall, the proposed advertisements would not cause a detrimental impact to public safety. In fact, it is considered that they would improve public safety by aiding wayfinding and alerting highway users to the location of the building entrances, whilst also brightening up a façade which is located in an area of variable environmental quality, and in turn discouraging anti-social behaviour and crime. The proposals are considered to accord with relevant policy and guidance in relation to public safety.

### **Amenity**

The Site is located within the Bloomsbury Conservation Area, with 80-116 (even) New Oxford Street identified in the Bloomsbury Conservation Area Appraisal and Management Strategy (2011) as making a positive contribution to the conservation area.

The proposed advertisements will be located on the rear façade of the building, facing Bainbridge Street which is a typical 'back' of a building, served by a street with a servicing character comprising rear access points, service areas and bin stores. The rear elevation of the building, in particular the ground floor, does not add value or play a positive role in the surrounding townscape, and so the siting of the proposed advertisements here would not cause any harm to the conservation area nor the amenity of the area.

The proposed advertisements are actually considered to improve the visual amenity of the immediate area through their clear and simple design which would add interest to the façade, in an area of variable environmental quality. Their non-illuminated nature would ensure that no light pollution is caused to neighbours or the environment. Additionally, due to the nature of Bainbridge Street, there are limited existing advertisements in the vicinity, so the two graphics would not contribute to visual clutter or an unsightly proliferation of signage.

As such, it is considered that the proposals accord with relevant planning policy and guidance in relation to amenity.

**Concluding Remarks**

We trust the enclosed information is sufficient to enable the Council to validate and determine the application within the statutory 8 week period. However, should you require any further information please do not hesitate to contact me at this office.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Joe Thompson', with a stylized flourish at the end.

**Joe Thompson**

Senior Planner

BSc (Hons) MPhil AssocRTPI