

PLANNING, DESIGN AND ACCESS STATEMENT

AFRICA HOUSE, 64-78 KINGSWAY, LONDON, WC2B 6AG

ERECTION OF ONE BANNER SIGN TO WEST FACING ELEVATION OF AFRICA HOUSE

Our Ref: AAH/2511/12PLA

November 2012

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CONTENTS	PAGE
1.0 INTRODUCTION.....	3
2.0 THE SITE DETAILS.....	5
3.0 PLANNING HISTORY.....	6
4.0 PLANNING POLICY.....	7
5.0 CONSIDERATION.....	14
6.0 CONCLUSION.....	18

1.0 Introduction

- 1.1 This statement sets out our analysis of the relevant planning policy principles which need to be considered in support of this application for advertisement consent; for a single banner sign to the west facing elevation at Africa House, on the scaffolding of the construction site.
- 1.2 The dimensions of the proposed sign would measure 27m (length) x 3m (height). The plans submitted with the application illustrate the proposed colours and lettering and logos on the elevation.



Figure 1 - Proposed signage to the west facing elevation

- 1.3 The advertisement would be quite simple in appearance and would only include text. The advert would have an orange coloured background with blue writing and a white border. It is proposed that the signage is erected temporarily for the duration of the construction work and would be removed upon completion.
- 1.4 The location of the sign is shown in below on the red edge location plan;



Figure 2 - Proposed signage location on Kingsway

- 1.5 The application building is located within Kingsway Conservation Area and has been designated as a Grade II Listed Building. The site is located within the administrative boundaries of Camden Council.
- 1.6 Whilst the proposal seeks only temporary consent for the proposed banner sign, it is appreciated that this raises certain planning policy issues and these are considered within this report in relation to local and national planning policy guidance and relevant planning case law.

2.0 The Site Details

- 2.1 The application site is located on the public highway Kingsway (A4200), which stretches in a north to south direction between the A40 and the A4. The highway is lined with mature trees on both sides. Holborn Underground Station is located towards the northern end of Kingsway with the application site located approximately 30 metres south of this.
- 2.2 The application site relates to the western elevation of Africa House. The building is currently undergoing construction and refurbishment work and as such the west facing elevation is surrounded by scaffolding and covered with neutral mesh netting.
- 2.3 The building itself is a six storey Grade II listed building built in 1921-2 by Trehearne and Norman. The building is constructed from portland stone and the triumphal arch style entrance has "Africa House" inscribed and surmounted by lions couchant. The upper storeys are set back and there are carved figures and animals. All of these features make up the reason for the listing of the building and make a positive contribution to the character and appearance of the Conservation Area, however at present they are temporarily hidden beneath the mesh sheeting and scaffolding, so the true architectural value and historic interest of the building cannot currently be appreciated.
- 2.4 The application sites lies within Kingsway Conservation Area. The buildings within the Conservation Area were constructed during the period of 1900 and 1920 and provides a large scale of Edwardian architecture. In particular the thoroughfare developed as a series of prestigious commercial buildings in a neo-classical style, that was uniform in materials, scale and massing and follows a consistent building line. In general the buildings have shops at the ground level with offices above. The building that the application relates to is important in the contribution that it has to the appearance of the Conservation Area.
- 2.5 The site of the application, being within a conservation area, requires any alterations to maintain or enhance the character or general amenity of the area. It is considered that the erection of the banner sign at the application site, for a temporary period during the refurbishment work, would achieve this. The merits of this assertion are explored in detail within this report, with the following section providing the planning policy considerations relevant to this application.

3.0 Planning History

- 3.1 Given the scale of the development taking place at Africa House there are a number of previous applications at the site. The most recent applications are;

2008/5547/P - Refurbishment of building including erection of new roof extension and rear extension to provide additional office space (Use Class B1), works to office core and lightwell and reversion of entire third floor to office use from part office/part D1 education use. Revisions include alterations to the rear (Gate Street) façade, roof level plant and front (Kingsway) elevation entrance. Granted.

2009/4897/P - Refurbishment of existing entrance hall at ground floor level to include enlargement of internal door openings and demolition of rear lifts. Granted.

2011/4863/P - Replacement of glazing of two windows located on the Gate Street (eastern elevation) frontage of this listed building with small louvers in each pane. Granted.

2012/2544/P - Proposed external illumination of the decorative features between second and sixth floor levels on the front elevation. Granted.

- 3.2 Although these permissions relate to the construction work that is currently being undertaken, they are not of direct relevance to this application, which seeks the erection of a banner signage for a temporary period during refurbishment works presently being carried out at the site.

4.0 Planning Policy

- 4.1 The Government's National Planning Policy Framework (NPPF) was adopted on 27 March 2012 and represents the principal national guidance document and a material consideration which must be taken into account, where relevant, in determining planning applications. This framework replaces all previous national policy statements, which were superseded on its adoption. Statements contained within cannot make irrelevant any matter which is a material consideration in a particular case, but where such statements indicate the weight that should be given to relevant considerations, decision makers must have proper regard to them.
- 4.2 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. Sustainable Development encompasses concepts of sustainable economic, social and environmental development which run concurrent with the spatial approach to planning.

Heritage Assets

- 4.3 The NPPF advises that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a Grade II Listed Building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, Grade I and II* Listed Buildings, Grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

Requiring Good Design

- 4.4 The NPPF also advises that poorly placed advertisements can have a negative impact on the appearance of the built and natural environment. Control over outdoor advertisements should be efficient, effective and simple in concept and operation. Only those advertisements which will clearly have an appreciable impact on a building or on their

surroundings should be subject to the local planning authority's detailed assessment. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.

- 4.5 Local Planning Policy Guidance is found within The London Plan (July 2011) and Camden Borough Council Local Development Framework Core Strategy and Development Policies.
- 4.6 The London Plan, published in July 2011, contains a number of strategic policies surrounding the development of places and spaces within London, with those of relevance to this application being largely concerned with preserving or enhancing local character and heritage assets. The following policies are, therefore, considered to be of general relevance to this application:

The London Plan (July 2011)

Policy 7.4 – Local Character

Strategic

- A) Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.

Planning decisions

- B) Buildings, streets and open spaces should provide a high quality design response that:
- a) has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass;
 - b) contributes to a positive relationship between the urban structure and natural landscape features, including the underlying landform and topography of an area;
 - c) is human in scale, ensuring buildings create a positive relationship with street level activity and people feel comfortable with their surroundings;
 - d) allows existing buildings and structures that make a positive contribution to the character of a place to influence the future character of the area; and

- e) is informed by the surrounding historic environment.

Policy 7.8 – Heritage Assets and Archeology

Strategic

- A) London's heritage assets and historic environment, including listed buildings, registered historic parks and gardens and other natural and historic landscapes, conservation areas, World Heritage Sites, registered battlefields, scheduled monuments, archaeological remains and memorials should be identified, so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.
- B) Development should incorporate measures that identify, record, interpret, protect and, where appropriate, present the site's archaeology.

Planning decisions

- C) Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.
- D) Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.
- E) New development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public on-site. Where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset.

- 4.7 The Council's Local Development Framework replaced their Unitary Development Plan in November 2010 and sets out their strategy for managing development within the Borough. A collection of planning documents, the LDF includes adopted Core Strategy policies and Development policies which supersede the policies set out in the UDP. The following, therefore, presents the Core Strategy and Development policies relevant to this application:

Camden Borough Council Local Development Framework Core Strategy and Development Policies

Policy CS14 – Promoting High Quality Places and Conserving Our Heritage

The Council will ensure that Camden's places and buildings are attractive, safe and easy to use by:

- a) requiring development of the highest standard of design that respects local context and character;
- b) preserving and enhancing Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens;
- c) promoting high quality landscaping and works to streets and public spaces;
- d) seeking the highest standards of access in all buildings and places and requiring schemes to be designed to be inclusive and accessible;
- e) protecting important views of St Paul's Cathedral and the Palace of Westminster from sites inside and outside the borough and protecting important local views.

Policy DP24 – Securing High Quality Design

The Council will require all developments, including alterations and extensions to existing buildings, to be of the highest standard of design and will expect developments to consider:

- a) character, setting, context and the form and scale of neighbouring buildings;
- b) the character and proportions of the existing building, where alterations and extensions are proposed;
- c) the quality of materials to be used;
- d) the provision of visually interesting frontages at street level;
- e) the appropriate location for building services equipment;
- f) existing natural features, such as topography and trees;
- g) the provision of appropriate hard and soft landscaping including boundary treatments;
- h) the provision of appropriate amenity space; and

- i) accessibility.

Policy DP25 – Conserving Camden’s Heritage

In order to maintain the character of Camden’s conservation areas, the Council will:

- a) take account of conservation area statements, appraisals and management plans when assessing applications within conservation areas;
- b) only permit development within conservation areas that preserves and enhances the character and appearance of the area;
- c) prevent the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area where this harms the character or appearance of the conservation area, unless exceptional circumstances are shown that outweigh the case for retention;
- d) not permit development outside of a conservation area that causes harm to the character and appearance of that conservation area; and
- F) preserve trees and garden spaces which contribute to the character of a conservation area and which provide a setting for Camden’s architectural heritage.



Figure 3: Extract from the Proposals Map

- 4.8 Whilst the above provide the most relevant statutory policies that should inform the type of development set out as part of this application, the Council's Supplementary Planning Guidance also represents an important consideration. Of most relevance to this application is the Camden Planning Guidance on Design, which provides specific reference to the introduction of banner signs on scaffolding:

Camden Planning Guidance 1: Design

- 4.9 Chapter 8 refers to advertisements, signs and hoardings and is especially relevant to this application. In general this guidance advises that the most satisfactory advertisements are those which take into account:

- The character and design of the property;
- The appearance of the surroundings; and
- The external fabric of the building.

- 4.10 The guidance advises that advertisements will not be considered acceptable where they impact upon public safety, such as being hazardous to vehicular traffic (e.g. block sight lines, emit glare) or pedestrian traffic (e.g. disrupt the free flow of pedestrian movement). In regards to Listed Buildings and Conservation Areas the guidance states that detailed consideration should be given the sensitivity and historic nature of these areas or buildings. Any advertisements on or near a listed building or in a conservation area must not harm their character and appearance and must not obscure or damage specific architectural features of buildings.

Of particular relevance in this guidance is the following paragraphs;

Shroud / Banner Advertisements

Paragraph 8.21

Conservation areas and listed buildings are particularly sensitive to these types of advertisements as they can appear overwhelming, and disrupt the appearance of a high quality built environment. Therefore, given the scale and size of shroud advertisements these types of advertisement proposals will only be considered acceptable primarily in commercial areas and only where they screen buildings under construction, alteration or refurbishment. If considered acceptable they will be allowed for a temporary period and should be removed on completion of the works should they be sooner than the approved period. Longer consents will require additional advertisement consent.

Paragraph 8.22

Shroud on scaffolding will only be permitted where:

- The scaffolding covers the entire elevation of the building and the netting on the scaffolding contains a 1:1 image of the completed building which is undergoing construction work (scaffolding is only to be erected for the purposes of carrying out building works and will be removed upon completion of the works); and
- The advertisement covers no more than 20% of each elevation and is not fragmented. The advertisement must also respect the architectural form and scale of the host building. Where shroud and banner advertisements are considered acceptable on listed buildings or in conservation areas the advertisement should not cover more than 10% of each elevation and should not be fragmented. The location of the advertisement on the

shroud will depend on the character of the local built form and the nature of views within it.

- In some highly sensitive locations or where the building plays a particularly important role in the appearance of the area, a visual representation of the building that is shrouded may be considered necessary to mitigate any harm to the appearance of the area.

4.11 The Conservation Area Appraisal provides further guidance for shops and adverts. In particular it states that shop signs should be appropriate for the Conservation Area, respecting the proportions of the shop frontages and maintaining the division between units and shop signs should not normally be above ground floor level.

4.12 In summary, the specific policies cited from the Core Strategy and within the Camden Planning Guidance document allows for the provision of banner signage subject to safeguarding the amenity, character and appearance of heritage assets and the Conservation Area.

5.0 Consideration

- 5.1 In this part of the statement, the proposed signage is considered against local and national planning policy and other material considerations. Key issues of analysis will focus on the impact on the Listed Building, Conservation Area and public amenity.

Impact on the Character and Appearance of the Conservation Area and the Listed Building and Neighbouring Heritage Assets in the Locality

- 5.2 The NPPF provides clear guidance on preserving the setting and appearance of heritage assets. In particular it states that;

'In determining planning applications, local planning authorities should take account of:

- *The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- *The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- *The desirability of new development making a positive contribution to local character and distinctiveness.'*

- 5.3 In addition to this the Camden Planning Guidance 1 advises detailed consideration should be given the sensitivity and historic nature of listed buildings and conservation areas. Any advertisements on or near a listed building or in a conservation area must not harm their character and appearance and must not obscure or damage specific architectural features of buildings.

- 5.4 The visual impact of the proposed signage on the conservation area and the listed building is therefore a material consideration and due regard must be given to the qualities of the heritage assets and its setting. The policy guidance therefore both at the National and Local Level seeks to ensure that the setting and appearance of the Listed Building and Conservation Area is preserved.

- 5.5 The Conservation appraisal for Kingsway advises that only three sections of Kingsway has been redeveloped since the 1920s, of which the application site is not one. Of the nearby buildings the appraisal states that some of the shop fronts have been harmed by

inappropriate signage and goes on to state that Africa House is an impressive stone faced steel framed building with two orders of giant columns and sculpture above the cornice. On either side are Twyford Place and Gate Street, older narrow lanes that have an appealing contrast in scale. Twyford Place has two significant buildings on either side, the columns of Africa House and the brick and stone dressings of the listed Roman Catholic Church of St Auselm & St Cecilia (1909).

5.6 The listing for Africa House refers to the age of the building (1921-22) and the architectural merit, in particular;

- Portland stone faced steel frame building;
- Round-arched triumphal arch style entrance inscribed "Africa House" and surmounted by lions couchant;
- Entablature with deep mutilated cornice surmounted by a pediment of carved figures and animals

5.7 The interior of the building has not been inspected and does not form part of the listing, nor is it affected by the proposed advertisement.

5.8 The proposed advertisement would see the erection of a sign on the neutral mesh that covers the scaffolding. The temporary scaffolding and mesh prevents views of the architectural merits of Africa House from being visible. This ensures that the advert would not detract from the current appearance of the listed building. As the scaffolding and mesh is only a temporary structure it is necessary to consider the longer term impact of the proposed advertisement on the listed building. This longer term impact would be minimal as there are no structural changes to the listed building and the advertisement is only temporary and would be removed once the scaffolding and mesh has been removed.

5.9 Therefore due to the temporary nature of the proposed advertisement and the fact that there would be no works to the fabric of the listed building, the proposal is considered to have a less than substantial impact on the listed building and would not harm the character and appearance or damage specific architectural features of the building.

5.10 Having assessed that the impact on the listed building is acceptable, it is important to determine the overall impact on the setting and appearance of the Conservation Area. The

ground floors of the buildings on Kingsway are predominantly thriving shop units, each with their own signage. It is reasonable to expect that the Local Planning Authority's duty to pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area will result in practice, in applying more exacting standards when the authority considers whether to grant consent for a proposed advertisement in such an area. In conservation areas, it is important for Local Planning Authorities to be sensitive to the use of their powers under the Control of Advertisements Regulations because many areas contain commercial or business premises, and outdoor advertising remains essential to commercial activity in a free and diverse economy.

- 5.11 In this respect, it is considered that outdoor advertisement displays in the area are acceptable and essential in the context of normal commercial and business activity, providing they do not have a long term, detrimental impact on the character or appearance of the area through adversely impacting upon visual amenity. Whilst it is acknowledged that large hoardings, by nature of their size and prominence, can adversely impact upon the visual amenity of an area, this is not believed to be the case here.
- 5.12 Given that the application is situated where construction and refurbishment works are ongoing, it is clear that these works have temporarily have an impact on the character and appearance of the Conservation Area. It is in this context of the redevelopment works that the impact of the advertisement should be considered.
- 5.13 The mesh and scaffolding covers most of the frontage of Africa House on all levels. The proposed sign would be located between ground and first floor level and would only cover part of the width of the elevation. This is a relatively small area and would ensure that the sign is not overbearing or over dominant in a sensitive area. The proposed sign would also be located forward of the footpath which would mean that the sign would not be visible to pedestrians walking under the scaffolding.
- 5.14 Therefore given that the construction works are currently having an impact on the setting of the Conservation Area, the proposed sign would be for a temporary period and that it would only cover a relatively small area, the proposed advertisement is unlikely to have any significant impact on the setting of the Conservation Area. It certainly would have no long term impact given that the sign would be removed once the construction works have been completed.

- 5.15 Overall it is considered that the proposed signage would only cover a relatively small area of the buildings frontage, would be erected on the scaffolding and mesh and would therefore not have any direct impact on the listed building and would be located within a shop frontage area. The proposed sign would also be for a temporary period during the construction works and after this has been completed would be removed from the site. Therefore the proposed sign would have no long term impact on the Listed Building and Conservation Area and when considered in relation to the existing building works the immediate impact on the setting of the Listed Building and Conservation Area is likely to be minimal.

Impact on Public Safety

- 5.16 As outlined earlier, any application for advertisement consent should consider the impact of a given proposal on public safety, with such considerations defined as matters having a bearing on the safe use and operation of any form of traffic or transport, including the safety of pedestrians. The main concerns relating to public safety usually centre on the potential for advertisements causing a visual distraction to motorists and pedestrians, which could subsequently compromise public safety. Where hoardings represent visually dominant features within prominent streetscape views, or result in the obscuration of highway sight lines, it is clear that such proposals would have an adverse effect on safety. However, the simple and modest design and scale of the hoarding, the low visual impact, and the height collectively ensures that the sign does not distract or obscure important sight lines which would compromise safety. In addition to this the sign would not be illuminated so would not add any other distractions to passersby.
- 5.17 Given the above assessment, it is therefore considered that the proposed signage is acceptable and would have a negligible impact on public safety in the area surrounding the application site.

6.0 Conclusion

6.1 In assessing this application in relation to local and national planning policy, it is considered that it should be granted for the following reasons:

- The proposed advertisement is of a modest scale that would be erected on the backdrop of a construction site. The advertisement would not have any impact directly on the architectural merit of the building and its temporary nature would ensure that there would be no long term impact on the Listed Building or the Conservation Area. The sign would be within a shop frontage area and would not be illuminated which would ensure that it would not be prominent within this area. The sign would also be located between the ground and first floor which is considered to be an acceptable height for such a proposal.
- Given that the advertisement would only be erected for a temporary period during the refurbishment/construction works currently taking place at the application site, it is considered that the long term amenity of nearby heritage assets and the conservation area as a whole would be preserved.
- Due to the siting, scale and height of the proposed advertisement and the fact that it would not be illuminated, the proposal would not compromise the safety of either pedestrian or highway users.

6.2 Having regard to the above and all other matters, it is subsequently considered that the temporary hoarding would meet the expectations of planning policy guidance. It is thus felt that this application for advertisement consent should be granted subject to appropriate conditions.