BRUNSWICK TENANTS AND RESIDENTS ASSOCIATION

10.11.2015

Application number: 2015/5823/L

Applicant: Giraffe

Site address: 19-21 Brunswick Centre London WC1N 1AF

Application Type: Listed Building Consent

Alterations in connection with display of Main Fascia Signage

Date Registered: 15-10-2015

Consultation Expiry Date: 11.11.2015

Dear Sir, Madam

On behalf of the Brunswick Tenants and Residents Association, I am writing to object to the application 2015/5823/L which includes the request for listed building consent by Giraffe to replace its current back-lit acrylic internal Main Fascia Signage with exposed neon tube signage:

''Fret cut blackened steel Giraffe letters, fixed back to a 50x50mm blackened mild steel frame with bended orange neon tubes @ 37m/a situated behind lettering. Sign to be suspended internally from the ceiling. Overall size 1600mm x 575mm x 150mm deep.''

Unit 19-21 in the Brunswick Centre comprises a commercial unit with lawful (Class A3) restaurant use, which forms part of the Brunswick Centre, a Grade II listed building within the Bloomsbury Conservation Area. With its corner location, the unit is in a key visual location within the Brunswick Centre. As well as being a particularly sensitive location in terms of design and heritage, the presence of extensive residential accommodation in the Brunswick centre including directly above and opposite the unit, means that the need to preserve the residential amenity also requires careful consideration.

With the sign already installed on 09.11.2015. (before the grating of listed building consent) the proposed signage can be properly assessed. The applicant appears not to have given any thought to impact of the provision of an exposed neon sign and level of illumination, whether it could be too bright and prominent – adversely impacting residential amenity as well as the special interest of the host listed building and the character and appearance of the conservation area.

We ask that the council attach conditions to the listed building consent to control the illumination of the sign (light pollution), limiting illumination to 600 candelas per any square meter or less, limiting the hours of illumination of the sign to 8:00 to 22:00 hours and preventing any intermittent illumination.

The reasons given for the imposition of these restrictions should be identified as the greater brightness of the sign (neon) and its illumination outside of permitted hours would be unduly obtrusive and would be detrimental to the amenity of the area and that preventing intermittent illumination is necessary to safeguard local visual and residential amenity.

Although the previous internal sign to Giraffe was illuminated, the sign was of low level illumination, fabricated of back-lit acrylic, not of exposed neon tube of the proposed sign.

The application proposals fail to demonstrate that necessary consideration has been given to heritage and amenity matters and accordingly they give rise to concerns in term of the associated impacts, which are detailed below.

DESIGN AND HERITAGE CONSIDERATIONS:

London Borough of Camden Core Strategy requires that materials should 'relate to the character and appearance of the area, particularly in conservation areas or within the setting of existing buildings.' …and requires 'development within conservation areas that preserves and enhances the character and appearance of the area.' In this context Policy requires all development to be of the highest architectural and urban design quality and seeks to secure an appropriate architectural style on a site-by-site basis, in response to the quality of the site, the proposed design, form and use and whether the townscape is of uniform or varied character.

In addition to the Council's statutory duties to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas' in the borough and to pay special regard to the desirability of preserving the [listed building] or its setting or any features of special architectural or historic interest.

In reviewing the proposal against these policies however, it is firstly apparent that the applicant has failed to provide any heritage assessment that properly assesses the effect of the proposals on the special interest of the listed building or the effect on the character and appearance of the conservation area. Without proper justification in heritage terms for the proposed design solution, the applicant has failed to demonstrate that regard has been paid to the need to statutory duty to protect the designated heritage assets.

In considering the proposed design, and in particular its use of exposed neon tubes, the committee's attention is drawn towards the internal fascia signs of the other premises within the Brunswick centre which are fabricated of back-lit acrylic. Of particular relevance is the Design and Access Statement submitted in support of the application, which considered the proposal 'in keeping with the existing unit and similar units within the Brunswick Centre.'

In the application under consideration, a comparison is made to the other units within the Brunswick Centre. This comparison, however, fails to take into account the care that all other commercial properties, including the previous illumination of Giraffe, have taken to use similar internal signage, to harmonise with the overall building design, as well as a subdued colour scheme, that is consistent with the rest of the Brunswick Centre units.

As the existing signage is more subdued and in better keeping with the listed building, it must therefore be harmful to the special interest of the listed building for the current proposal to seek to install neon-tubes.

As the site is within the Bloomsbury conservation area, consent is required for the proposed illuminated signage – the brightness and form of illumination to the sign clearly have the potential to adversely impact both the listed building and the conservation zone.

Accordingly it is considered that the proposal does not comply with the Borough's Policies of the Core Strategy and is therefore unacceptable in terms of design and heritage.

AMENITY CONSIDERATIONS:

The Core Strategy recognises the need for all development to ensure good living conditions for the residents, which requires applicants to take into account the prevailing characteristics of the area and recognises that adverts can have a negative impact in terms of visual amenity.

Since Giraffe has taken occupation of 19-21 Brunswick Centre, there have been extensive noise and disturbance associated by the operator. Attention of the Committee is drawn to recent complaints by residents at the late night disturbance of patrons entering and exiting the premises. It should be recognised that Giraffe operation is more noisy and intensive that other units within the Brunswick, and it is a significant concern that the proposals do not appear to have had due regard to residential activity.

In addition to the adverse impacts on the listed building and conservation zone area, particular concern is raised with regard to the illuminated signage as it is likely that it will give rise to light pollution that will cause significant adverse impact to residential amenity to residents in the flats above and opposite the unit.

The internally illuminated neon signage proposed clearly does cause severe light pollution and adversely impact on the quality of life of the adjoining residents, but there is no evidence of this having been considered in the proposals. The applicant appears not to have given any thought to the impact on the residential units of the provision of exposed neon tube signage and the absence of any detail on the level of illumination, whether it could be too bright and prominent – adversely impacting residential amenity as well as the special interest of the host listed building and the character and appearance of the conservation area.

Accordingly, it is considered that the proposal does not comply with Core Strategy and is therefore unacceptable in terms of their impact on residential amenity.

CONCLUSION:

The above objections raised by the Brunswick Tenants and Residents Association (BTRA) on behalf of residents, clearly show that the proposal for the Main Fascia Signage of unit 19-21 in the Brunswick Centre is unacceptable and accordingly planning permission and listed building consent should be refused.

As a minimum we ask that the council attach conditions to the listed building consent to control the illumination of the sign, limiting illumination to 600 candelas per any square meter or less, limiting

the hours of illumination of the sign to 10:00 to 22:00 hours and preventing any intermittent illumination. The reasons given for the imposition of these restrictions should be identified as the greater brightness of the sign (neon) and its illumination outside of permitted hours would be unduly obtrusive and would be detrimental to the amenity of the area and that preventing intermittent illumination is necessary to safeguard local visual and residential amenity.

Given our concerns with the proposed illuminated neon sign, we would be grateful for updates on progress on the application moving forward, including any revisions or alterations to the proposal.

We trust that due consideration will be given to the objections raised and that the application will be refused planning permission and listed building consent if these are not adequately addressed by the applicant

Yours faithfully.

Ben Nicholls

OBO The Brunswick Tenants and Residents Association.