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Camden Council
Development Management
Camden Town Hall Extension
Argyle Street
London
WC1H 8EQ

26 April 2016

CD/16-119/PP-05059873
VIA PLANNING PORTAL

Dear Sir/Madam,

RE: COFFEE DOGS KIOSK, KINGS CROSS, PANCRAS ROAD, LONDON, N1C 4TB

On behalf of our client, Wasabi Co. Ltd, we are instructed to submit an application for advertisement consent for the display of 4 no. internally illuminated hanging 'menu screens' and 2 no. internally illuminated 'goal post' signs, at the abovementioned premises.

Accordingly, please find enclosed herewith the following documents, which in addition to this letter comprise the application:

- Duly completed Advertisement Application Form;
- Site Location Plan at scale 1:1,250 with the site edged in red;
- Existing Plan and Elevation (Drawing no. A102);
- Proposed Plan Elevation and Section (Drawing no. A201); and
- A cheque for £110.00 made payable to Camden Council.

The three 'Wasabi Sushi & Bento' and 'Made Fresh Daily' advertisements benefit from deemed consent under Schedule 3, Part 1, Class 5 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007. However, for clarity, these advertisements have been shown on the application drawings.

a. Wasabi Co. Ltd

Wasabi Co. Ltd comprises an oriental Sushi and Bento chain, with branches throughout London and across the UK. Wasabi provides healthy and convenient food (specialising in sushi and bento products) to the local workforce, shoppers, commuters and visitors alike, with any individual unit servicing its own local area. As such, an effective advertisement scheme is required which not only conveys the brand to members of the public, but also contributes to the appearance of the unit and its surroundings.

b. The Application Proposals

The application seeks consent for the display of 4 no. internally illuminated hanging 'menu screens' and 2 no. internally illuminated 'goal post' signs.

The proposed signage drawing (Drawing no. A201), provides further details relating to design, size and siting.

Our services include: delivery | design | engagement | heritage | planning | sustainable development | transportation

Iceni Projects is the trading name of Iceni Projects Limited. Registered in England No. 05359427

c. Planning Policy

National Planning Policy

Current national guidance on advertisement control is set out in the National Planning Policy Framework (NPPF), which recognises that the control over outdoor advertisements should be efficient, effective and simple in concept and operation. The NPPF clarifies (in Paragraph 67) that the display of outdoor advertisements can only be controlled in the interests of “amenity” and “public safety”, taking account of cumulative impacts.

The London Plan (July 2011) including Further Alterations to the London Plan (March 2015) and Minor Alterations to the London Plan (March 2016)

In July 2011, the Mayor published the replacement of the spatial development strategy for London – known as the London Plan. The London Plan is the overall strategic plan for London, and it sets out a fully integrated economic, environmental, transport and social framework for the development of the capital to 2031.

On 10 March 2015, the Mayor of London published Further Alterations to the London Plan (FALP), following which, Minor Alterations to the London Plan (MALP) were adopted by the Mayor of London in March 2016. From this date, FALP and MALP are operative as formal alterations to the London Plan and form part of the development plan for London.

A number of policies within the London Plan are relevant to the consideration of these proposals, and have been identified as follows:

- Policy 7.4 – Local Character: states that developments should have regard to the form, function and structure of an area and should build on the positive elements that can contribute to establishing an enhanced character for the future function of an area.
- Policy 7.6 – Architecture: confirms that architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape, incorporating the highest quality materials and design appropriate to its context.
- Policy 7.8 – Heritage Assets and Archaeology: recognises the importance of identifying London’s heritage assets and historic environment so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.

The Development Plan

The statutory development plan for the application site currently comprises the Camden Local Development Framework Core Strategy (adopted 2010), the Camden Development Policies DPD (2010), and the Site Allocations DPD (2013).

The Core Strategy provides the vision, objectives and spatial policies to guide development in the Borough up to 2025. The Development Policies and Site Allocations DPDs contribute towards delivering the Core Strategy by setting out detailed planning policies to use for determining planning applications, and by identifying land and buildings for future development, respectively.

The Policies Map accompanying the statutory development plan identifies the application site as being within the Central Activities Zone (CAZ), the Kings Cross Growth Area, and the Kings Cross St Pancras Conservation Area. The premises are not the subject of any statutory listing.

Due regard has been given to the emerging Draft Camden Local Plan (2015), which as yet has not been tested at Examination and does not form part of the statutory development plan, such that it can only be afforded limited weight.

Core Strategy (2010)

The following Core Strategy policies are considered to be relevant to the determination of the application proposals.

CS2 – Growth Areas: Development in Camden to 2025 will be concentrated in the growth areas of Kings Cross, Euston and Tottenham Court Road. These areas are expected to provide new homes and a substantial majority of new business floorspace in the period to 2025.

Policy CS5 – Managing the Impact of Growth and Development: The Council will ensure that development protects and enhances the local environment, heritage, and the amenity and quality of life of local communities, whilst also ensuring that the impact of developments on their occupiers and neighbours is fully considered.

Policy CS9 – Achieving a Successful Central London: Policy CS9 highlights the role that Central London will play in the development of homes, offices, hotels, shops and other uses. The explanatory text (at Paragraph 9.5) identifies Kings Cross as a growth area, in line with Policy CS2, stating that development in this area should contribute to the area economically through providing a 'substantial number of new jobs and space for businesses; being of high quality design.'

Policy CS14 – Promoting High Quality Places and Conserving our Heritage: Policy CS14 advises that development should be of the highest standard of design that respects local context and character, and should preserve and enhance Camden's heritage assets and their settings, including conservation areas.

Development Policies DPD (2010)

The following Development Policies are also considered to be of relevance to the determination of the application proposals:

Policy DP24 – Securing High Quality Design: Policy DP24 requires all developments to be of the highest standard of design, and will expect developments to consider, amongst other matters; the character and proportions of the existing building, and where alterations are proposed; the quality of materials to be used, and the provision of visually interesting frontages at street level.

DP25 – Conserving Camden's Heritage: Policy DP25 aims to protect the character of conservation areas within the Borough. It states that proposals should take account of conservation area statements, appraisals and management plans when assessing applications within conservation areas, and that these will only be permitted within conservation areas if they preserve or enhance the character and appearance of the area.

Other Material Considerations

Accordingly, due regard has also been given to the following supplementary Camden planning guidance:

- Camden Planning Guidance (CPG) 1: Design (2011); and
- Kings Cross St Pancras Conservation Area appraisal and Management Plan (2003).

The proposed advertisements will be located at the Coffee Dogs Kiosk, with a frontage facing away from Pancras Road and on to Kings Cross Square, which is a large public square benefitting from excellent public footfall within the locality. The surrounding area is characterised by a substantial amount of commercial uses, where advertisements such as those proposed are a common form of paraphernalia.

The application advertisements, by virtue of their size, scale, siting and amount are proportionate to the size and scale of the commercial building and will not result in a proliferation of signage to the detriment of the character and appearance of the building or the surrounding commercial area, and will ensure that the appearance of the Kings Cross St Pancras Conservation Area is preserved and enhanced. The advertisements will create a lively atmosphere of colour, variety and interest, and thus

make a positive contribution to the visual environment.

The 4 no. internally illuminated 'menu screens' will be hung internally and will comprise LG / 47LV35A-5B TV screens (having 46.96" panels measured diagonally), with green metal housing. The method of illumination (being no greater than 450 cd/m²) will ensure that the signage is not unduly visible and prominent.

Furthermore, it is considered that the proposed graphics will not cause a distraction to pedestrians, cyclists or traffic, and thus highway safety. The advertisements will contain a very simple text, and as set out above, the advertisements will be illuminated at a very low level, to allow them to be read and easily assimilated.

Likewise, the 2 no. HI-MACS Light Green (S212) 'goal post' signs will be internally illuminated, and will have no greater output than 2835 cd/m² LED, to ensure that the proposals will not be unduly dominant in the Square or harm the visual amenity of the character and appearance of the Kings Cross St Pancras Conservation Area.

By virtue of the relationship between the unit and Kings Cross Square, the form of development within the surrounding area, and the size, scale, and design of the advertisements, the proposals will not appear incongruous or unduly prominent, and therefore will not result in a detrimental visual impact on the character and appearance of the unit, nor on the surrounding area. We therefore consider that the proposal is wholly in keeping with the character of the property, the surrounding area, and its location in a Conservation Area.

Consequently, the proposals wholly comply with the National Planning Policy Framework, and are in accordance with Policies CS5 and CS14 of the London Borough of Camden Local Development Framework Core Strategy (2010), Policies DP24, DP25 and DP26 of the Camden Development Policies DPD (2010), and with Policies 7.4, 7.6 and 7.8 of the London Plan (2015).


d. Conclusion

The proposed signage would make a positive contribution to the appearance of the property and assist the commercial aspect of the operation of Wasabi Co. Ltd.

Taking account of the pertinent policies in National, Regional and Local Planning Policy, and the nature and design of the proposed advertisements, it is believed there is no principal objection to their instalment. We would appreciate it if you were able to facilitate an early decision so as to ensure this property is re-occupied as quickly as possible.

We look forward to receiving your confirmation that the application has been registered. Should you require any further information in the interim, please do not hesitate to contact myself or Danielle St Pierre (dd. 020 3725 3841) of this office, in the first instance.

Yours faithfully,



Claire Day BSc (Hons) MRICS MRTPI
DIRECTOR

Encs