



111A GREAT RUSSELL STREET
LONDON WC1B 3NQ

DISPLAY OF TWO INTERNALLY ILLUMINATED SIGNS TO WALL AND TWO INTERNALLY ILLUMINATED PROJECTING SIGNS

Application for advertisement consent reference: 2017/3559/A

2 July 2017

The Bloomsbury Association object to this application and wish to make the following comments:

1. Camden's planning policy concerning advertisements is informed by DCLG guidance 'Outdoor advertisements and signs: a guide for advertisers' and by Camden Planning Guidance CPG1, Design.

In Section 8 of CPG1 Camden has formulated and adopted advertisement control policy statements, indicating what detailed considerations are regarded as relevant to their decisions on advertisement applications. These statements indicate the circumstances in which advertisements are likely to be permitted or refused and are a material factor in deciding the application. This proposal fails to meet the issues described in sections 8.5-8.9 inclusive, 8.11-8.14 inclusive, 8.17 and 8.19 of this document.

In deciding an application, DCLG guidance states that the planning authority may consider only two issues in addition to local policy statements; these are described as the interests of amenity and public safety.

DCLG goes on to clarify: *'The terms 'amenity' and 'public safety' are not defined in detail in the advertisement control rules, although advice on these terms is given in Circular 03/2007 and PPG 19. Each planning authority (and the Secretary of State on appeal) must interpret what is meant by these expressions as they apply in particular cases. In practice, 'amenity' is usually understood to mean the effect upon visual and aural amenity in the immediate neighbourhood of displaying the advertisement, or using an advertisement site, where passers-by, or people living there, will be aware of the advertisement. So in assessing amenity, the planning authority will always consider the local characteristics of the neighbourhood. For example, if your advertisement will be displayed in a locality where there are important scenic, historic, architectural or cultural features, the planning authority will consider whether it is in scale and in keeping with these features. This might mean that the planning authority would refuse consent for a large poster-boarding which would visually dominate a group of 'listed' buildings. But where there are large buildings and main highways, for example in an industrial or commercial area of a major city, the planning authority may grant consent for large advertisements which would not adversely affect visual amenity in the neighbourhood of the site.'*

'It also means aural amenity, so any noise the advertisement makes will be taken into account before express consent is given.'

'Public safety' means the considerations which are relevant to the safe use and operation of any form of traffic or transport on land (including the safety of pedestrians), over water or in the air. So, for this purpose, the planning authority must assess the likely effects of your advertisement in relation to such matters as the behaviour of drivers, possible confusion with any traffic sign or signal, or possible interference with a navigational light or aerial beacon. But the planning authority will assume that all advertisements are intended to attract people's attention, so that

the advertisement you want to display would not automatically be regarded as a distraction to passers-by in vehicles or on foot. What matters is whether your advertisement, or the spot where you propose to site it, will be so distracting or so confusing that it creates a hazard for, or endangers, people who are taking reasonable care for their own and others' safety. When they are considering 'public safety' factors for your advertisement, the planning authority will normally consult other relevant bodies, for example the highway authority if your advertisement is alongside a major road.'

2. The proposal will have a significant impact on long distance views along Great Russell Street. Contrary to LDF policy, the proposal will be detrimental to the adjacent conservation areas, particularly in its harmful visual impact on important local views from adjacent Bloomsbury and Hanway Street Conservation Areas. It will also detract from the setting of a number of nearby listed buildings, including 5-12 Great Russell Street opposite, Congress House 23-28 Great Russell Street, Lutyens former YWCA (now the Bloomsbury Hotel) 16-22 Great Russell Street and 98-109 Great Russell Street. No evidence is provided with the application to justify such a dramatic change in the building's impact on London's streetscape. The drawings accompanying the application ignore the city context totally, which is so important in assessing the proposal and give a clear insight into the applicant's objectives.

Reference should be made to the projecting signs on 98-103 Great Russell Street as an indication of what might be suitable in such a sensitive streetscape.

We are surprised that the Council agreed to even register the application without any visual impact assessment including photomontage images from key viewpoints. The proposal cannot be adequately considered without this and the Council will be failing in its duty to approve the application on this basis, a decision that arguably would be invalid.

3. The proposal is over-signed and makes no reference to the storey-high illuminated sign in the premises window. Light pollution from the proposed signs will impact on the amenity of residential uses directly opposite at 13 Great Russell Street. It may also have an effect on residential uses on Adeline Place.

The Association supports good quality design that will enhance Bloomsbury's streetscape, which this clearly does not. With such a demonstrable breach of the Council's planning policy and of its supplementary planning guidance, we look to the Council to refuse this application.

We would be grateful if you would let us know of any further modification to the application; the decision, if it is to be decided under delegated powers, or the meeting date if it is to be decided by Committee.

Stephen Heath
On behalf of the Bloomsbury Association

Copies to:
Councillor Adam Harrison, London Borough of Camden
Councillor Sue Vincent, London Borough of Camden
Oluwaseyi Enirayetan, London Borough of Camden
Bloomsbury Conservation Area Advisory Committee
Chair, Bloomsbury Association