



**RETAIL UNIT 4, 251-258 TOTTENHAM COURT ROAD
LONDON WC1T 1RB**

DISPLAY OF 2 INTERNALLY ILLUMINATED FASCIA SIGNS (LETTERING ONLY), AND 2 NON-ILLUMINATED PROJECTING SIGN (ALL SIGNAGE DISPLAYED ON TOTTENHAM COURT ROAD ELEVATION AND BEDFORD AVENUE ELEVATION)

Application for advertisement consent reference: 2017/4502/A

23 August 2017

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

1. Camden's Local Plan 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.'*

'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.'

In our view, 'public safety' is not an issue in this instance. 'Amenity' is.

2. The proposal makes no reference to the six-storey high illuminated public art installation commissioned by Camden Council from the developer and now implemented on the upper floors of the entire Bedford Avenue facade. While the proposed signage will be much smaller, it is difficult to judge comparative levels of illumination and it could well be that the proposed halo illuminated signage on Bedford Avenue could conflict with and damage the amenity of the public art, particularly when viewed from the east, at night and in the winter, when trees have lost their foliage. A non-illuminated sign might be appropriate on this side of the building but not an illuminated one.
3. The corner projecting signs would have a particularly harmful impact on the architectural integrity and visual amenity of the host building. When granted planning permission, much care went into the quality and detailing of the stone frame components of 1 Bedford Avenue, which are carefully complemented by the public art installation. The proposed corner projecting signage disregards this and also disrespects the insignia of the Bedford Estates carved into the stonework directly above. Sadly, on the same corner, there is a very unsympathetic Camden advertisement banner attached to an adjacent lamp column and it would be very unsound streetscape design to add even more visual clutter to the same corner. The projecting signs should be omitted and it would be good to see signage design guidelines imposed by the building manager to restrict other shops from doing the same.
4. Contrary to Local Plan policy, the proposal could be detrimental in its visual impact on the amenity of local views along Bedford Avenue from the adjacent Bloomsbury Conservation Area. Depending on levels of illumination in the proposed halo illuminated signage, it could also detract from the setting of a number of nearby listed buildings, including the Bedford Avenue frontages to 40-53 Bedford Square, which are all grade I listed. No evidence is provided with the application to justify such a change in the building's impact on Bloomsbury's streetscape. The drawings accompanying the application ignore the city context totally, which is so important in assessing the proposal.

Reference should be made to the approved proposals for the redevelopment of 251-258 Tottenham Court Road and 1 Bedford Avenue (2013/3880/P). It should be noted that the computer-generated images provided in support of the application do not show shop signage on the Bedford Avenue elevation, only on the elevation to Tottenham Court Road. Again, a non-illuminated sign might be appropriate on the Bedford Avenue side of the building but not an illuminated one.
5. We have no objection to the signage proposed above the shop entrance on Tottenham Court Road.

The Association supports good quality design that will enhance Bloomsbury's streetscape, which this does not. We look to the Council to seek amendments or refuse this application because of its effect on the amenity of public art and of the immediate neighbourhood.

We would be grateful if you would let us know of any further modification to the application and the decision, if it is to be determined under delegated powers.

Stephen Heath
On behalf of the Bloomsbury Association

Copies to:

Councillor Adam Harrison, London Borough of Camden
David Fowler, London Borough of Camden
Tessa Craig, London Borough of Camden
Bloomsbury Conservation Area Advisory Committee
Chair, Bloomsbury Association