

# **PLANNING, LISTED BUILDING CONSENT AND ADVERTISEMENT CONSENT APPLICATIONS FOR INTERNAL AND EXTERNAL ALTERATIONS AND DISPLAY OF ADVERTISEMENTS**

## **PLANNING, DESIGN AND ACCESS STATEMENT**

**118–132 NEW OXFORD STREET, WEST END,  
LONDON, WC1A 1HL**

**ON BEHALF OF LLOYDS BANKING GROUP**

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)  
PLANNING AND COMPULSORY PURCHASE ACT 2004  
PLANNING (LISTED BUILDING & CONSERVATION AREAS) ACT 1990**

### **Pegasus Group**

Pavilion Court | Green Lane | Garforth | Leeds | LS25 2AF

**T** 0113 287 8200 | **W** [www.pegasuspg.co.uk](http://www.pegasuspg.co.uk)

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester

**PLANNING** | **DESIGN** | **ENVIRONMENT** | **ECONOMICS**

## CONTENTS:

Page No:

1.	INTRODUCTION	1
2.	THE APPLICATION SITE AND WIDER CONTEXT	4
3.	PLANNING HISTORY	7
4.	THE PROPOSAL	8
5.	PRE-APPLICATION CONSULTATION	10
6.	PLANNING POLICY	11
7.	DESIGN AND ACCESS STATEMENT	17
8.	PLANNING ASSESSMENT	20
9.	CONCLUSIONS	25

---

## **1. INTRODUCTION**

- 1.1 This Planning Statement has been prepared by Pegasus Group on behalf of Lloyds Banking Group to support Planning, Listed Building and Advertisement Consent applications for internal and external building alterations and display of advertisements at 118-132 New Oxford Street, West End, London, WC1A 1HL.
- 1.2 This document describes the application site, the detailed parameters of the proposal and illustrates the process that has led to the development proposals.
- 1.3 The description of development relevant to each application is as follows:

### ***Planning Application***

- 1.4 *Alterations to existing shopfront comprising installation of glazed entrance and frontage, 3no. ATMs and 3no. CCTV cameras.*

### ***Listed Building Consent***

- 1.5 Internal and external alterations as follows:

#### External Works

- *Removal of existing modern shop front and replacement with new glazed shopfront, incorporating a new entrance, ATMs, fascia and signage; and*
- *Installation of new projecting sign.*

#### Internal Works - Basement

- *Removal of existing shop fittings and partitions, including suspended ceilings and escalators;*
- *Installation of new stairs, lift and escalators;*
- *Insertion of new partitions to form offices, toilets and back of house areas; and*
- *Redecoration throughout, including new floor, wall and ceiling finishes.*

### Internal Works – Ground Floor

- *Removal of existing shop fittings and partitions, including suspended ceilings and escalators;*
- *Installation of new shopfront and glazing;*
- *Installation of new stairs, lift and escalators;*
- *Installation of new atrium opening to first floor;*
- *Insertion of new partitions to form offices, and back of house areas; and*
- *Redecoration throughout, including new floor, wall and ceiling finishes.*

### Internal Works – First Floor

- *Removal of existing shop fittings and partitions, including suspended ceilings and escalators and opening up of windows;*
- *Installation of new stairs, lift and escalators;*
- *Installation of new atrium opening to ground floor;*
- *Insertion of new partitions to form offices, and back of house areas; and*
- *Redecoration throughout, including new floor, wall and ceiling finishes.*

### **Advertisement Consent**

1.6 *Display of 4no. halo illuminated fascia signs and 1no. projecting sign.*

1.7 The submission of this application follows pre-application discussions with the London Borough of Camden Council.

1.8 This statement should be read in conjunction with the Heritage Statement prepared by Pegasus Group, and is divided into the following sections:

### **Section 2: The Application Site and Wider Context**

1.9 This section describes the application site and how it relates to the wider context.

### **Section 3: Planning History**

- 1.10 This section details any planning history specifically relevant to the application site itself, as well as any relevant determined applications in the immediate surrounds

### **Section 4: The Proposal**

- 1.11 This section sets out a detailed explanation of the proposals and the factors that have influenced design, scale, siting and appearance.

### **Section 5: Pre-Application Consultation**

- 1.12 This section sets out details of the pre-application discussions and assessments that have taken place prior to the submission of the applications

### **Section 6: Planning Policy**

- 1.13 The planning policy context for the site includes both national policy guidance and the statutory Development Plan that comprises the recently adopted Camden Local Plan (July 2017) alongside The London Plan and other relevant planning guidance documents.

### **Section 7: Design and Access Statement**

- 1.14 This section explains the design principles and concepts that have been applied to the development and how the site context has influenced the design.

### **Section 8: Planning Assessment**

- 1.15 This section outlines the planning matters that are considered to be important to the determination of the Planning, Listed Building and Advertisement Consent applications. Considerations are addressed in turn and explained in the context of the relevant planning policy outlined in the previous section.

### **Section 9: Conclusions**

- 1.16 This section provides the concluding comments in relation to the application proposals

## 2. THE APPLICATION SITE AND WIDER CONTEXT

- 2.1 The application site comprises the property known as 118-132 New Oxford Street, which is located at the junction of Tottenham Court Road (west), New Oxford Street (south) and Bainbridge Street (east). Tottenham Court Road underground station is accessed from the footway adjoining the site.



*Photograph of the application site*

- 2.2 The building has five main storeys, rising to seven and is Grade II listed, also sited on the south-western edge of the Bloomsbury Conservation Area. Adjoining the building to the north is the Grade II listed Dominion Theatre.
- 2.3 The basement, ground and first floors, which are subject to the proposed works, are in retail use, whilst the 2<sup>nd</sup> – 6<sup>th</sup> floors, not affected by these applications, are in office use. The entrances to Corinthian House on Tottenham Court Road and the original shopfront on Bainbridge Street do not form part of the application site.
- 2.4 The property was designed and constructed by Harry Wilson in 1928-1930 as the flagship store of Burtons, and was designed in the art deco style which was used by Wilson in order to establish an architectural identity for the retailer across their stores throughout the country. The retail elements currently include Burton and Dorothy Perkins retail outlets.

- 2.5 The existing shopfront is a modern insertion, with the primary access being from the entrance on the corner of New Oxford Street and Tottenham Court Road. Access to the offices on the upper floors is from the Tottenham Court Road entrance, with a secondary service entrances to the Bainbridge Road elevation, including the only remnant of the original shopfront.
- 2.6 The windows on ground and first floors are blocked internally with modern shop fittings, whilst the glazing to the Bainbridge Street and half of the New Oxford Street shopfront is obscured with black vinyls.
- 2.7 The primary frontage is that which fronts on to New Oxford Street and continues around to Tottenham Court Road.
- 2.8 The listing description of the building states as follows:

*GV II*

*See under: No.279 Burton's Headquarters and Shop TOTTENHAM COURT ROAD.*

*CAMDEN*

*TQ2981SE TOTTENHAM COURT ROAD 798-1/104/1642 (East side) 11/09/90  
No.279 Burton's Headquarters and Shop*

*GV II*

*Includes: Nos.118-132 Burton's Headquarters and Shop NEW OXFORD STREET. Headquarters office and shop. c1929-30. By Harry Wilson. For Montague Burton. Stone faced steel frame. EXTERIOR: 7 storeys on a corner site. 7 bays to main Oxford Street facade, recessed canted angles 1 bay each, left hand return to Tottenham Court Road 3 bays, right hand return 2 bays. Ground floor shop altered late C20. Mezzanine 1st floor with margin glazed, tripartite metal framed windows in plain rectangular recesses. Main facade with Greek detailing to 6 Corinthian pilasters rising from 1st to 3rd floor to support an entablature with projecting cornice surmounted by antefixae. Within this frame, metal framed tripartite windows with spandrel panels to 2nd and 3rd floors. Outer bays with narrow, vertically set windows to 1st,*

*2nd and 3rd floors. Attic storey has short, horizontally set windows above which a stepped parapet with shaped, architraved, horizontally set window surmounted by a winged cartouche. Tottenham Court Road facade similar. Recessed angles with distyle-in-antis fluted columns, otherwise similar with stepped back parapets. Right hand return, plain recessed openings on 4 floors, tripartite to left bay, paired to recessed left bay. INTERIOR: not inspected. HISTORICAL NOTE: this store and offices was the flagship of an organisation founded in 1914 which became the largest men's clothing organisation in the world, offering quality clothes at the cheapest possible prices. Burton was also a pioneer in the field of industrial welfare in an exploitative industry.*

### 3. PLANNING HISTORY

- 3.1 A review of the Local Planning Authority's online records reveals various planning, listed building and advertisement consent applications on the site. The most recent and relevant applications are as follows:
- 3.2 Listed Building application **2016/3767/L** – Erection of outer doors and replacement of inner doors at ground floor level, creation of internal lightwell (following removal of part of 6<sup>th</sup> floor slab) and internal roof terrace at 5<sup>th</sup> floor and 6<sup>th</sup> floor level; alterations and extension to 6<sup>th</sup> floor level including rooflights; relocation of plant to 2 plant rooms at 7<sup>th</sup> floor roof level; and creation of roof terrace at 7<sup>th</sup> floor level including access and balustrade; and external repair and refurbishment of existing offices.
- 3.3 Planning application **2016/3484/P** – Erection of outer doors and replacement inner doors at ground floor level, creation of internal lightwell and internal roof terrace at 5<sup>th</sup> and 6<sup>th</sup> floor level; extension and rooflights to 6<sup>th</sup> floor; relocation of plant to 2 plant rooms at roof level; and creation of roof terrace at 7<sup>th</sup> floor level including access and balustrade.
- 3.4 Listed building consent application **2007/2003/L** - Alterations to fascia including display of individually illuminated lettering to fascia signs on elevations fronting Tottenham Court Road and Oxford Street. Approved 14.06.2007.
- 3.5 Advertisement consent application **2007/1588/A** - Display of individually illuminated lettering to fascia signs on elevations fronting Tottenham Court Road and Oxford Street. Approved 14.06.2007
- 3.6 Listed building application **2004/2598/L** and advertisement consent **2004/2602/A** - The display of a halo illuminated fascia sign and 3 high level banners. Part granted/refused 31.08.2004.
- 3.7 Planning application **2004/0842/P** – The retention of alterations to an existing shop front and installation of a new security shutter to a Bainbridge Street emergency exit. Approved 16.07.2004
- 3.8 Listed building application **2004/0869/L** – Internal alterations at basement, ground and first floor levels of existing retail premises. Approved 16.07.2004.

#### **4. THE PROPOSAL**

- 4.1 It is proposed that the building will be occupied as a key flagship branch for the Halifax Bank. The prominent location of the site and its accessibility for a wide customer base will allow the bank to provide excellent customer service, meeting modern banking needs. In sensitively revitalising the building, the Bank will be making a significant investment in the locality, in addition to providing a highly viable re-use of the listed building.
- 4.2 The external works as shown on the submitted drawings can be summarised as follows:
- Installation of glazed entrance;
  - Installation of replacement shopfront;
  - Installation of 3no. integrated ATMs;
  - Installation of 3no. CCTV cameras.
- 4.3 The external works to the new shop front are restricted to only the ground floor of the building. This part of the building has been subject of various changes since the original building was constructed. No alterations are proposed to be made to the upper floors of the external elevations of the building or to the roof. Accordingly, the scheme will protect the historic and architectural interest of the external aspects of the building.
- 4.4 Internal works to the building are as detailed in the Heritage Statement and broadly include:
- Removal of existing shop fittings and partitions, including suspended ceilings and escalators;
  - Installation of new stairs, lift and escalators;
  - Insertion of new partitions to form offices toilets and back of house areas;
  - Redecoration throughout, including new floor, wall and ceiling finishes and
  - Installation of new atrium opening.

- 4.5 The proposals also incorporate 4no. halo illuminated fascia signs and 1no. projecting sign to replace the existing signage at fascia level, which will display the bank's corporate branding.
- 4.6 The change of use from retail (Class A1) to bank (Class A2) will be made under deemed consent by virtue of Class D of Part 3 of Schedule 2 of the Town and Country Planning General Permitted Development Order 2015. Accordingly, the applications relate only to the physical alterations to the building.

## **5. PRE-APPLICATION CONSULTATION**

5.1 Pre-application discussions have been undertaken with the Local Planning Authority, including a meeting with Planning and Conservation Officers on 20<sup>th</sup> July 2017.

5.2 A formal response to the pre-application request has been provided by letter and can be summarised as follows:

- Should provide an assessment of the impact of the proposed ATMs on pedestrian movement;
- Shop frontages should be largely glazed to maintain a window display rather than creating a solid frontage and therefore clear justification for use of vinyl should be provided;
- Acknowledged that the existing shopfront is not historic and of no historic value. Therefore, the principle of a replacement shopfront would be supported, but a Heritage Statement would be required.;
- Investigate the existing construction for historic elements and investigate whether it would be possible to include a reference to the former Burton's presence;
- Removal of part of first floor to create an internal atrium would need justification within the Heritage Statement;
- Highlight any benefits that would be brought forward which would outweigh any harm, or at least the harm caused by not replacing with a traditional shopfront.
- Documents which would need to be submitted for a valid application.

5.3 A pre-application consultation letter has also been sent to the Bloomsbury Conservation Area Advisory Committee inviting comments on the proposals. To date, no response has been received from the advisory committee.

## 6. PLANNING POLICY

- 6.1 In this section, national and local planning policy guidance pertinent to the application site and development proposal is identified. The plan-led approach to development, as enshrined by Section 38(6) of the Planning and Compulsory Purchase Act 2004, requires development proposals to accord with the adopted development plan unless material considerations indicate otherwise.
- 6.2 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the decision maker to have special regard to the desirability of preserving a Listed Building or its setting, or any features of architectural or historic interest which it possesses.
- 6.3 Section 72 the Act requires special attention to be paid to the desirability of preserving or enhancing the character or appearance of that area.
- 6.4 The development plan relevant to the proposal comprises
- Camden Local Plan (2017); and
  - The London Plan (2016)
- 6.5 Relevant National Policy and Guidance includes:
- National Planning Policy Framework (NPPF) (2012); and
  - National Planning Practice Guidance (NPPG) online.
- 6.6 This section will summarise the pertinent policies at national and local level.

### i) Local Planning Policy and Guidance

#### Camden Local Plan (2017)

- 6.7 **Policy C5 – Safety and security** – Aims to make Camden a safer place including requiring developments to demonstrate that they have incorporated design principles which contribute to community safety and security and promote safer streets and public areas.
- 6.8 **Policy C6 – Access for all** – Seeks to promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities. This includes expecting all buildings and places to meet the highest practicable standards of

accessible and inclusive design so that they can be used safely, easily and with dignity by all.

6.9 **Policy E1 – Economic development** – Sets out that the Council will secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses. Of relevance, this includes

- Supporting businesses of all sizes;
- Encourage the concentrations of professional and technical services, creative and cultural businesses and science growth sectors in the borough;
- Recognise the importance of other employment generating uses, including retail, education, health, markets, leisure and tourism.

6.10 **Policy A1 – Managing the impact of development** – Seeks to ensure that the amenity of communities, occupiers and neighbours is protected.

6.11 **Policy D1 – Design** – Identifies that the Council will seek to secure high quality design in development and will require that development:

- respects local context and character;
- preserves or enhances the historic environment and heritage assets in accordance with Policy D2;
- comprises details and materials that are of high quality and complement the local character;
- is inclusive and accessible for all;
- is secure and designed to minimise crime and antisocial behaviour;

6.12 **Policy D2 – Heritage** – relates to the preservation and, where appropriate, enhancement of heritage assets and their settings, including conservation areas and listed buildings.

6.13 The policy sets out that the Council will not permit loss of or substantial harm to a designated heritage asset, unless it can be demonstrated that the substantial harm

or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.

6.14 The Council will not permit development that results in harm that is less than substantial to the significance of a heritage asset unless the public benefits of the proposal convincingly outweigh that harm.

6.15 The policy also requires that development within conservation areas preserves or, where possible, enhances the character or appearance of the area.

6.16 **Policy D3 – Shopfronts** – when determining proposals for shopfront development, the Council will consider:

- The design of the shopfront or feature, including its details and materials;
- the existing character, architectural and historic merit and design of the building and its shopfront;
- the relationship between the shopfront and the upper floors of the building and surrounding properties, including the relationship between the shopfront and any forecourt or lightwell;
- the general characteristics of shopfronts in the area;
- community safety and the contribution made by shopfronts to natural surveillance;
- the degree of accessibility;

6.17 **Policy D4 – Advertisements** – states that the Council will require advertisements to preserve or enhance the character of their setting and host building. Advertisements must respect the form, fabric, design and scale of their setting and host building and be of the highest standard of design, material and detail.

The London Plan (2016)

6.18 **Policy 7.3 Designing out crime** – seeks that development reduces the opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating. Of relevance, this includes that places, buildings and structures should incorporate appropriately designed security features

6.19 **Policy 7.4 - Local character** – requires that buildings, streets and open spaces should provide a high quality design response including that:

- is human in scale, ensuring buildings create a positive relationship with street level activity and people feel comfortable with their surroundings
- allows existing buildings and structures that make a positive contribution to the character of a place to influence the future character of the area
- is informed by the surrounding historic environment.

6.20 **Policy 7.8 – Heritage assets and archaeology** – sets out that:

- Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.
- Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

Camden Planning Guidance – CPG1 Design

6.21 **Chapter 3 Heritage** – sets out as follows:

- The Council will only permit development within conservation areas that preserves and enhances the character and appearance of the area;
- Conservation area statements, appraisals and management plans contain more information on all the conservation areas;
- Historic buildings can and should address sustainability.

6.22 **Chapter 7 Shopfronts provides detail on how to deal with the five key shopfront features:**

- Shopfront components
- Signs and lighting;
- Blinds and canopies;
- Security shutters;

- Cash machines.

## 6.23 Chapter 8 Advertisements, Signs and Hoardings

- 6.24 Paragraph 8.6 sets out that advertisements and signs should respect the form, fabric, design and scale of the host building and setting. Generally advertisements will only be acceptable at fascia level or below. (Paragraph 8.7). Advertisements will not be considered acceptable where they impact upon public safety, such as being hazardous to vehicular traffic or pedestrian traffic.

### ii) National Planning Policy and Guidance

#### National Planning Policy Framework (NPPF) (2012)

- 6.25 At the heart of the NPPF is a presumption in favour of sustainable development which for decision-taking, this means (unless material considerations indicate otherwise) approving development proposals that accord with the development plan without delay.
- 6.26 Paragraph 17 of the NPPF outlines 12 core planning principles, which of relevance includes that planning should:
- always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;
  - take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;
  - conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations;
- 6.27 Section 1 of the NPPF sets out that the Government is committed to securing economic growth in order to create jobs and prosperity and is committed to ensuring the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore, significant weight should be placed on the need to support economic growth through the planning system.

- 6.28 Paragraph 20 states that to help achieve economic growth, LPAs should plan proactively to meet the development needs of business and support an economy fit for the 21<sup>st</sup> century.
- 6.29 It goes on to say that *Investment in business should not be over-burdened by the combined requirements of planning policy expectations.*
- 6.30 Section 7 sets out that good design is a key aspect of sustainable development, is indivisible from good planning and should contribute positively to making places better for people. Paragraph 61 states that although visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment.
- 6.31 In relation to advertisements, Paragraph 67 states that poorly placed advertisements can have a negative impact on the appearance of the built and natural environment. Only those advertisements which will clearly have an appreciable impact on a building on their surroundings should be subject to the LPAs detailed assessment. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.

National Planning Practice Guidance (NPPG)

- 6.32 The NPPG reiterates the importance of good design and states that design impacts on how people interact with places and can affect a range of economic, social and environmental objectives beyond the requirement for good design in its own right. The following issues should be considered:
- Local character
  - Crime prevention
  - Security measures
  - Access and inclusion

## **7. DESIGN AND ACCESS STATEMENT**

### Access

- 7.1 The site is centrally located within the Bloomsbury Conservation Area. The location of the site is highly sustainable and accessible by public transport including underground, bus and by walking. Tottenham Court Road underground station adjoins the site.
- 7.2 The entrance to the building is located at ground level, with a power assisted glazed entrance to provide suitable disabled access. The proposals include the modification of the existing lift and stair apertures to allow for the installation of a new DDA compliant lift. ATMs to be provided on the external elevations of the building are also to be DDA compliant.

### Layout

- 7.3 The proposals introduce a replacement glazed entrance at the corner of New Oxford Street and Tottenham Court Road. It is proposed to provide ATMs towards the outer edges of the New Oxford Street and Tottenham Court Road frontages which, for operational and security reasons, require sections of vinyl to screen the internals of the building from public view. The positioning of these towards the edges of the elevations prevent interference with the visually prominent glazed shop frontage, whilst being suitably integrated within the building to support pedestrian flows and crime prevention objectives.
- 7.4 Back office areas and meeting rooms have been located towards the less prominent Bainbridge Street elevation in the ground floor of the building. This will retain glazed sections to the main elevations and retain areas of vinyl which serve the existing store. The internal arrangement of the building will maximise the customer experience of the flagship branch, including provision of an atrium which is central to the Halifax experience and from which the bank will create a series of content hubs to meet all banking needs of the customer.
- 7.5 Replacement lift and staircase structures, will be located in the same location as the existing structures.

### Scale

- 7.6 The scale of the building and its features will not be affected by the proposals. The scale of functional elements including ATMs, entrance and lifts are designed to meet DDA requirements and are not proposed to change significantly from the scale of existing features.
- 7.7 Similarly, the fascia signage to the shop frontage will reflect the scale of existing signage and will be located at the same fascia level, which replicates the scale and position of signage which would serve the original shopfront.

### Appearance

- 7.8 External alterations will be limited to the shopfront at ground floor level and this will not affect any elements of historic value.
- 7.9 The most noticeable change from the current shopfront will be the introduction of replacement advertisements to display the corporate branding of the bank to reflect the change in occupier of the site. This will change much of the existing black vinyl serving Dorothy Perkins and Burton with blue vinyl for the Halifax bank, which will be attached to the glazing using a low tack adhesive. White text signage indicating the current retailers will also be replaced with 4no. white Halifax logos, with a small aluminium projecting sign also at fascia level. These will incorporate low level halo illumination (will not exceed 600 candelas per sqm) which will identify the bank outside of daylight hours but will not introduce public safety issues or significant levels of light pollution within the conservation area.
- 7.10 Internally, the site will be given an uplift allowing significantly more natural light to enter the building and exposing the window features at ground and first floor level through the removal of modern hanging rails and fittings which at present form a screen.
- 7.11 The introduction of a central atrium is a key feature of the interior scheme, which is designed to open up the vistas between the ground and first floors. This will create a grandeur befitting a landmark property and, alongside the proposal to reinstate the windows on both floors, maximises the natural ambience within the building.

- 7.12 The atrium is intended to form the centre-point to the branch experience and a series of content 'hubs' have been designed to inspire educate and help manage all aspects of the customers financial needs. These hubs will radiate from here across both floors. The atrium will function as a light-filled customer lounge which will flex into a seminar and presentation space, where the bank will host a calendar of events designed to provide the customer with the extra support they need.

#### Landscaping

- 7.13 The site is located within the built up area in central London, located on the street frontages of New Oxford Street and Tottenham Court Road. The extent and nature of the application site adjacent to the pedestrian footway and public highway does not present any opportunities to provide landscaping within the proposals.

## **8. PLANNING ASSESSMENT**

8.1 Reflecting on the legislative framework, policy context and planning application package, matters for consideration can be broken down as follows:

- Benefits of the proposals and the need for development;
- Design considerations and the impact of the development on designated heritage assets;
- Accessibility including public safety and disabled access;
- Security and crime prevention.

8.2 Each of these aspects is considered in turn.

### **Benefits of the proposals and the need for development**

8.3 The benefits of the proposals can be summarised as follows:

- Significant investment to support economic growth and the sustainable reuse of a listed building;
- Proposals will encourage further investment in a highly sustainable location, to the benefit of the wider local economy;
- Attractive refurbishment of the building will support an attractive professional service with a wide catchment for local residents and businesses;
- Proposals are sensitive to the historic building and conservation area and will help to secure the longevity of the heritage assets.

8.4 Policy E1 of the Camden Local Plan confirms that the Council will secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses. Section 1 of the NPPF sets out the Government's commitment to secure economic growth to create jobs and prosperity and ensure the planning system does everything it can to support sustainable economic growth.

8.5 The package of alterations are designed to sensitively integrate the new occupier into the building and create an environment which will deliver professional

customer experience to meet the requirements of modern banking in the 21<sup>st</sup> century. The atrium is intended to form the centre-point to the branch experience and a series of content 'hubs' have been designed to inspire, educate and help manage all aspects of the customer's financial needs. The atrium will function as a light-filled customer lounge which will flex into a seminar and presentation space, where the bank will host a calendar of events designed to provide the customer with the extra support they need.

- 8.6 Other alterations including a replacement shopfront, insertion of new partitions and removing modern internal additions are integral to the overall appearance, customer experience and the operational and security requirements of the bank.
- 8.7 The proposed development will require significant investment to provide necessary alterations to the existing building to support a viable reuse of the listed building. This will in turn support an attractive and high quality professional service for local residents and businesses and lead to further investment in the local area. Accordingly, the proposal gains considerable support from Policy E1 of the Camden Local Plan and Section 1 of the NPPF which sets out that significant weight should be placed on the need to support economic growth through the planning system.

#### **Design considerations and the impact of the development on designated heritage assets**

- 8.8 The proposals have been designed to respect the local character and site context. Replacement advertisements are to reflect the design of the existing signage, albeit reduced in its coverage along the shop frontage. The proposed advertisements comprise 4no. fascia signs and 1no. projecting sign reflecting the banks corporate branding, which will identify the bank to local residents and businesses from the Tottenham Court, New Oxford Street and Bainbridge Street frontages.
- 8.9 The scale and proportions of the signage are commensurate with the existing signs and a low-level halo illumination will ensure the bank is identifiable at hours of darkness, whilst preventing any appreciable impact on the listed building or the wider conservation area. The proposed advertisements therefore preserve the character of their setting and respect the form, fabric, design and scale of the host building.
- 8.10 The works incorporate the provision of a replacement shopfront which is suitable for the operational requirements of the banking use, whilst respecting the historic

context within which it is located. The proposals are to provide limited change to the existing shopfront, which is not believed to retain any elements of historic value. The shopfront is designed to reflect the characteristics of shopfronts in the area and complies with Policy D3 of the Local Plan. The proposed ATMs form an integral part of the buildings design and their proportions ensure they are not dominant in the shop display frontage, as required by Camden Planning Guidance 1.

- 8.11 Internally, the proposals involve the removal of a number of recent fixtures which presently block windows and preventing natural light from entering the building. The provision of the atrium between ground and first floor level will result in limited loss of fabric. However, it has been identified that this is not of special historic or architectural significance which would merit its special protection. Furthermore, the atrium has been designed as part of an interior scheme which maximises the customer experience and opens up the space.
- 8.12 A detailed assessment of the impact of the internal works on the designated heritage assets is set out within the Heritage Statement which accompanies the planning application.
- 8.13 The Heritage Statement identifies that the proposals represent an acceptable and appropriate form of development, when considered against the special historic and architectural interest of the Grade II Listed Building. They would also serve to enhance the character and appearance of the Bloomsbury Conservation Area and the setting of the other Listed Building within the vicinity of the application site.

#### **Accessibility including public safety and disabled access**

- 8.14 Policy C6 of the Camden Local Plan seeks to promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities.
- 8.15 The proposals incorporate three ATMs integrated within the external facades of the shopfront. The sensitive positioning and integration within the facades of the building ensures that the machines are highly accessible for all without affecting the flow of pedestrian movement.
- 8.16 The ATMs are to be located avoiding the areas immediately adjacent to the pedestrian crossing at the junction of Tottenham Court Road and New Oxford Street. Two are located where the footway is at its widest on the New Oxford Street

frontage and therefore avoids any issues immediately adjacent to the pedestrian crossing or the underground station exit. The other external ATM is to be located at the junction of New Oxford Street and Bainbridge Street where it is also integral to the building and therefore will not affect the movement of people along New Oxford Street. The ATMs are therefore fully compliant with Camden Planning Guidance 1.

- 8.17 Whilst detailed consideration has been given to the position of the ATMs to avoid queuing affecting visibility and pedestrian movement, it is understood that customers generally have no loyalty to a particular bank for cash withdrawals. There are existing banks within the vicinity of the site and the provision of additional ATMs will mean that queuing is less likely to occur. The provision of a number of ATMs and services internally within the building will also ensure an efficient service that prevents customers from queuing.
- 8.18 The power assisted entrance to the site, the proposed ATMs and replacement lift and stairs are all proposed to be fully DDA compliant to meet the needs of all banking customers. The ATMs are also fully accessible in both location and detailed arrangement and therefore comply with Policy C6 of the Camden Local Plan.

### **Security and crime prevention.**

- 8.19 The provision of ATMs forms an integral part of the banking use. The ATMs will be monitored by 24 hours CCTV, concealed on the underside of the soffits. Whilst the ATMs are integral to the building and positioned to avoid any effect on the movement of pedestrians, the ATMs are also located on the busiest elevations of the building where they will benefit from a high level of natural surveillance, to reduce the risk of robbery as required by Camden Planning Guidance 1.
- 8.20 The glazed areas of the shopfront surrounding the ATMs are to have vinyl applied which is a security requirement to ensure the internal arrangement and accessibility of the cash machines is not exposed to public areas. The positioning of the vinyl areas preventing visibility into the building is based on the visibility and accessibility of the ATMs in the streetscene, as well as minimising the visual appreciation of the historic shopfront and the contribution this makes to the Bloomsbury Conservation Area. ATMs at alternative locations would lack visual prominence and natural surveillance (Bainbridge Street) or would interfere with the aesthetics of the shopfront along Oxford Street.

8.21 The proposals incorporate design principles which contribute to community safety and promote safer streets and public areas. The proposals therefore comply with Policy C5 of the Camden Local Plan and Policy 7.3 of the London Plan.

## 9. CONCLUSIONS

### *Planning Application*

- 9.1 The planning application relates to the installation of a new glazed shopfront and glazed entrance, along with the installation of 3no. ATMs and 3no. CCTV cameras.
- 9.2 The replacement entrance and shopfronts are similar to the existing elements to be replaced. The existing features are not of historic value and would involve the replacement with a new shopfront which is appropriate to the use of the site as a bank. No external alterations are proposed to the upper floors which retain original historic features. The Heritage Statement accompanying the application identifies that the proposals would enhance the character and appearance of the Conservation Area, and the setting of the other Listed Building in the vicinity of the application site.
- 9.3 The ATMs have been located to ensure they do not affect the free flow of pedestrians, and are to be integrated into the building to provide a high level of visibility from the busy footways adjoining the site. CCTV cameras are to be discreetly located on the underside of the soffits and will provide 24 hour monitoring to maximise security and crime prevention measures.
- 9.4 The proposals provide a highly accessible development including replacement of non-original features with DDA compliant elements. The proposals also incorporate design principles which promote community safety, particularly through the provision of CCTV and natural surveillance. The proposals therefore comply with policies C5, C6, D1, D3 and E1 of the Camden Local Plan.

### *Listed Building Consent*

- 9.5 The submission is accompanied by a Heritage Statement, which provides a detailed assessment of the proposals and the impact on designated heritage assets including the Grade II Listed Building and the Bloomsbury Conservation Area. The assessment identifies that the application proposals represent an acceptable and appropriate form of development when considered against the special historic and architectural interest of the Grade II Listed Building. It is accepted that the new atrium opening will involve the limited loss of some of the fabric of the building. However, this is not considered to be historically or architecturally important fabric and this loss would be outweighed by the renovation scheme which will see the

windows and trading floors opened up and the existing shopfront replaced. Accordingly, the proposal complies with the requirements of the NPPF, PPG and local policy, through the sympathetic reuse of a heritage asset and the various physical and economic enhancements this will bring to the Listed Building and the wider area.

### ***Advertisement Consent***

- 9.6 Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts. The replacement signage is of a similar appearance to the existing signage, albeit reduced in extent along the shop frontage. The visual appearance of the proposed fascia signage is appropriate given the sites context in a predominantly retail area. The scale, proportions and design of the signage is similar to the existing fascia, whilst reflecting the corporate branding of the end user.
- 9.7 In terms of public safety, the signage is to be securely attached to the building. A soft level of halo-illumination will be provided around the signage which will identify the bank during hours of darkness, but will not be hazardous to vehicular or pedestrian traffic. The proposed advertisements therefore comply with Policy D4 of the Camden Local Plan and Chapter 8 of CPG 1.

### **Summary**

- 9.8 In summary, the proposals represent a highly sustainable form of development which will support the Government's commitment to create jobs and prosperity and support economic growth.
- 9.9 The proposals will result in a significant level of investment which will support the local economy and the sustainable reuse and refurbishment of a listed building to provide a flagship branch for a long established national bank. The proposals will revitalise the building and whilst there will be limited loss of fabric, this is not considered to be historically or architecturally important. Furthermore, this would be outweighed by the benefits of the scheme which include provision of the atrium which is central to the design of the bank, its natural ambience and customer experience. The proposals incorporate sensitive design considerations which will secure the future of designated heritage assets, whilst providing an attractive professional service to a wide catchment of local residents and businesses.

- 9.10 The proposals have demonstrated a high quality design which respects the historic character of the building and the wider conservation area. Detailed consideration has also been given to public safety in terms of accessibility for all and security including crime prevention measures. The proposals demonstrate a high level of compliance with National and Local planning policies.
- 9.11 The proposals have been demonstrated to comply with relevant policies in the Camden Local Plan and the National Planning Policy Framework and therefore, the Planning, Listed Building and Advertisement Consent applications should be approved.