

009.ES/P17-1505

12th January 2018

David Peres Da Costa
Regeneration and Planning Development Management
London Borough of Camden
Town Hall
Judd Street
London
WC1H 8ND

Planning Portal Reference: PP-06653512

Dear David,

Re: Advertisement consent for temporary display of advertisement on construction hoarding at 118-132 New Oxford Street, West End, London, WC1A 1HL.

On behalf of Lloyds Banking Group, we enclose an application for advertisement consent for the display of an advertisement on a temporary construction hoarding at 118-132 New Oxford Street.

In addition to this letter, the following documents have been produced in support of the application:

- Application Forms & Certificates;
- Ground Floor Hoarding Plans ref. 50941725-AR01-00-1002 REVA; and
- Details of proposed adverts.

Site Location and Description

The site is located on the junction of Tottenham Court Road, New Oxford Street and Bainbridge Street. The building has been occupied by the Burton Group for many years and includes recently vacated Burton and Dorothy Perkins retail outlets.

The building is Grade II listed and is sited within the Bloomsbury Conservation Area.

Pegasus Group

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

T 0113 287 8200 | www.pegasusgroup.co.uk | [@pegasuspg](https://twitter.com/pegasuspg)

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 PLANNING  DESIGN  ENVIRONMENT  ECONOMICS

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Recent applications have been approved for physical internal and external alterations to the building in connection with a banking use as a flagship Halifax branch. The consented development will provide enhancements to the historic character of the building and the appearance of the wider conservation area.

Relevant planning history

The site has an extensive planning history for various works to the building and display of advertisements at the site. Most recently, planning permission and listed building consent were granted under the following applications:

2017/4925/P – *Planning permission for Alterations to existing shopfront comprising installation of glazed entrance and frontage, 1 x ATM to New Oxford Street elevation and 3 x CCTV cameras.* Approved 01/12/2017.

2017/4926/L – *Listed building consent for External alterations comprising installation of replacement glazed entrance and shopfront including 1no. ATMs and 3no. CCTV cameras, fascia and projecting sign. Internal alterations at basement, ground and first floor including removal of existing shop partitions and escalators, installation of new stairs, lift, insertion of new partitions to form offices, toilets and back of house areas, new floor, wall and ceiling finishes and installation of new atrium opening at first floor level.* Approved 01/12/2017.

Applications have been submitted for slight variations of the planning and listed building applications for internal and external works on the site which are currently pending consideration.

Advertisement consent 2017/4927/A was also granted for the display of 4 x internally illuminated fascia signs and 1 x internally illuminated projecting sign to the shopfront on 01/12/2017.

Description of the proposed development

Approval for planning, Listed Building consent and Advertisement consent for the site has already been achieved. This application seeks approval for Advertisement consent on a temporary hoarding which will be installed around the building during the construction period. The hoarding itself is permitted development under Class A of Part 4 of the GPDO 2015, as a temporary structure required in connection with refurbishment works.

The hoarding will be 3 metres in height and 57 metres in width around the hoarding on the site frontage, providing safety to pedestrians walking along the footway adjoining the site. The advertisement will not be illuminated. Further details of the proposed advertisement is shown on the drawings accompanying the application.

The display of the advertisement is proposed to be in place for a short period of eight weeks between 26 February 2018 to 23rd April 2018. The advertisements will temporarily provide some visual interest and through the graphics related to the end user, will minimise the effect of hoarding and a blank frontage within this prominent part of the conservation area whilst the site is closed off the members of the public.

Planning policy and guidance

The National Planning Policy Framework (March 2012)

The NPPF was published in March 2012 and replaces all previous Planning Policy Statements (PPSs) and Planning Policy Guidance Notes (PPGs). It sets out the Government's planning policies for England and how these are expected to be applied.

The NPPF contains policies to guide both plan making and individual planning decisions. Its basis is a *"presumption in favour of sustainable development"*, which generally seeks a positive and creative planning process focused on meeting development needs, and importantly states that *"development proposals in accordance with the development plan"* should be approved without delay.

Paragraph 67 states that *"poorly placed advertisements which can have a negative impact on the appearance of the built and natural environment. Only advertisements which will clearly have an appreciable impact on a building or on their surroundings should be subject to the local planning authority's 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

The National Planning Practice Guidance sets out more detailed guidance on the assessment of applications for advertisement consent. It states that:

"There are less likely to be road safety problems if the advertisement is on a site within a commercial or industrial locality, if it is a shop fascia sign, name-board, trade or business sign, or a normal poster panel, and if the advertisement is not on the skyline."

Paragraph: 067 Reference ID: 18b-067-20140306

It is also advised that *"buildings which are being renovated or are undergoing major structural work and which have scaffolding or netting around them may be considered suitable as temporary sites for shroud advertisements or large 'wrap' advertisements covering the face, or part of the face, of the building."*

Paragraph: 005 Reference ID: 18b-005-20140306

Paragraph: 068 (Reference ID: 18b-068-20140306) of the NPPG identifies the main types of advertisements which may cause danger to road users, this includes:

- (a) those which obstruct or impair sight-lines at corners, bends or at a junction, or at any point of access to a highway;
- (b) those which, because of their size or siting, would obstruct or confuse a road-user's view, or reduce the clarity or effectiveness of a traffic sign or signal;
- (c) those which effectively leave insufficient clearance above any part of a highway, or insufficient lateral clearance for vehicles;
- (d) those externally or internally illuminated signs:
 - (e) those which incorporate moving or apparently moving elements in their display;
 - (f) those requiring close study;
 - (g) those which resemble traffic signs:

Local Plan 2017

The Local Plan was adopted on 3 July 2017 and has replaced the Core Strategy and Camden Development Policies documents as the basis for planning decisions and future development in the borough.

Policy D4 sets out the Council's policy on advertisements. 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.*

We will support advertisements that:

- a. Preserve the character and amenity of the area; and*
- b. Preserve or enhance heritage assets and conservation areas.*

We will resist advertisements that:

- c. Contribute to an unsightly proliferation of signage in the area;*

- d. Contribute to street clutter in the public realm;*
- e. Cause light pollution to nearby residential properties or wildlife habitats;*
- f. Have flashing illuminated elements; or*
- g. Impact upon public safety.”*

Local Guidance

Policy CPG1 provides local guidance on hoardings which states that:

Advertisement hoardings or posters will be carefully controlled in conservation areas and on or near listed buildings to ensure that they do not detract from the area’s and building’s character and appearance. However, if an area has a mix of uses or is predominantly in commercial use some poster or hoarding advertising may be acceptable where they satisfactorily relate to the scale of the host building or feature and its surroundings. They should be designed and positioned as an integral feature of the building. Some guidelines on when hoardings will not be considered acceptable include:

- in locations where they may prevent or significantly damage views or obscure light;*
- where they are forward of the face of adjoining buildings;*
- where they project above roof ridge/eaves level;*
- where they obscure architectural features or landmarks (including windows or window recesses); and*
- on side walls where they would be unduly dominant.”*

It is considered that this guidance is intended to apply to permanent advertisement hoardings and not to wrap advertisements to be applied to temporary construction sites.

The advertisement will be forward of the face of the building and will obscure the shopfront as is required during the works. However, the hoarding with the advertisement applied will have no greater harm than a blank hoarding, and will in fact add visual interest to the streetscene whilst views of the listed building are screened.

Appraisal

Visual Amenity

A blank hoarding would otherwise exist on the site to provide safety and protection to members of the public whilst the site is closed off and works are carried out to restore the listed building.

Consideration must therefore only be given to the impact of the advertisement attached to the hoarding in relation to visual amenity and public safety. This must take into account that a blank hoarding would exist in the same location and of the same size, only without the display of graphics on the hoarding. It must also be noted that the hoarding would only be displayed for a short term temporary period whilst the refurbishment works are carried out.

National Planning Policy confirms that *"Only advertisements which will clearly have an appreciable impact on a building or on their surroundings should be subject to the local planning authority's detailed assessment."* The advertisement would have no long-term impact on the listed building or the wider conservation area.

The separate planning and listed building applications have demonstrated that the proposals will provide a sensitive enhancement to the character and appearance of the conservation area and will ensure the long-term retention and sustainable reuse of the listed building. The advertisements are designed to promote the enhancement and reopening of the site as a flagship Halifax branch and therefore will provide an economic boost to the area, which would not otherwise be achieved if a blank hoarding is erected screening the site.

Given the short-term nature of the advertisement in this location, the advertisement would be beneficial in visual terms to the character and appearance of the conservation area.

Public Safety

The advertisement would be attached to the hoarding, which provides safety to the public during the construction hoarding.

The NPPG states that:

There are less likely to be road safety problems if the advertisement is on a site within a commercial or industrial locality, if it is a shop fascia sign, name-board, trade or business sign, or a normal poster panel, and if the advertisement is not on the skyline.

Paragraph: 067 Reference ID: 18b-067-20140306

The NPPG also identifies that the main types of advertisement which may cause danger to road users are:

- (a) those which obstruct or impair sight-lines at corners, bends or at a junction, or at any point of access to a highway;
- (b) those which, because of their size or siting, would obstruct or confuse a road-user's view, or reduce the clarity or effectiveness of a traffic sign or signal;
- (c) those which effectively leave insufficient clearance above any part of a highway, or insufficient lateral clearance for vehicles;
- (d) those externally or internally illuminated signs:
 - (e) those which incorporate moving or apparently moving elements in their display;
- (f) those requiring close study;
- (g) those which resemble traffic signs:

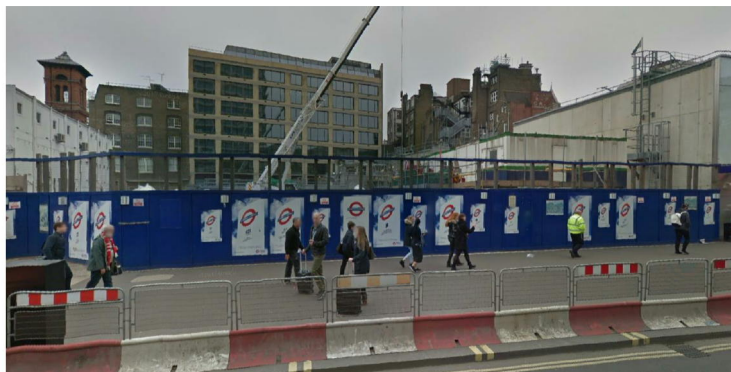
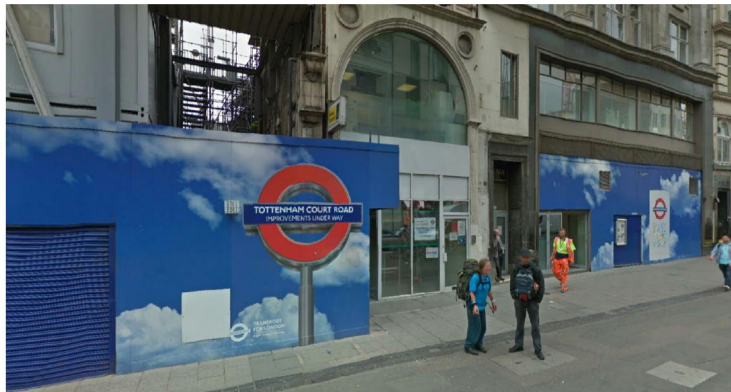
The advertisement itself would be attached to the hoarding and positioned behind the footway in a commercial area where it would not act as a distraction to nearby motorists.

The advertisement is simple in its design comprising limited symbols and text which indicate the future occupier of the building. It would not draw the attention away from the road and does not incorporate images which are moving, resemble traffic signs and would not result in large amounts of text or information which would require close study of the advertisement.

Accordingly, there would be no adverse impact on public safety.

Examples of promotional advertisements on construction hoardings in the immediate locality of the site

Advertisements have typically been used on hoardings to protect the site as part of the ongoing improvements to the underground station at Tottenham Court Road.



Examples of signage on construction hoardings at Tottenham Court Road underground station. The proposed advertisements would be similar in nature to those shown, providing visual interest at and thereby preventing a blank frontage in the streetscene at ground level.



Photograph showing a blank construction hoarding used historically in close proximity of the application site.



This hoarding was updated with graphics which are considered to give an improved appearance to the blank hoarding and are certainly not considered to be more harmful in terms of visual amenity or public safety.

It should be noted that the hoarding proposed in this case would be at ground level and not elevated as is the case shown above.

The proposed advertisement will be 3 metres in height and will not be illuminated. It will not be in a location where it may prevent or significantly damage views or obscure light. Any impacts of the signage will be temporary. The advertisements will temporarily provide some visual interest and through the graphics related to the end user, will minimise the effect of hoarding and a blank frontage within this prominent part of the conservation area whilst the site is closed off the members of the public. The advertisement on the hoarding

will have minimal impact on the character and appearance of Bloomsbury Conservation Area, will not impact upon public safety or be a distraction to road users.

Conclusion

This application seeks consent to display an advertisement on a temporary construction hoarding at 118-132 New Oxford Street.

The temporary construction hoarding is to be erected in connection with restoration and refurbishment works which have been consented on the site for a temporary period of eight weeks.

The advertisement would have no permanent or long-term impact on the listed building or the character of the conservation area. It is intended that the advertisement will add visual interest to the area whilst the site is closed off to members of the public.

The potential impacts of the proposals have been considered and appropriately addressed alongside all relevant planning policies. This assessment has clearly demonstrated that the proposal will not have an appreciable impact is in accordance with the relevant guidance and policies of the adopted local plan.

As such, the advertisement consent application should be approved without delay.

Yours sincerely,



EDWARD SENIOR
Principal Planner

E-mail: edward.senior@pegasusgroup.co.uk