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|--|-----------------------|--|----------------------------------|------------------|-------------------|-------------------|-----------|
| <b>Delegated Report</b>  | <b>Analysis sheet</b> |  | <b>Expiry Date:</b>              |                  | <b>03/05/2019</b> |                   |           |
|  | N/A                   |  | <b>Consultation Expiry Date:</b> |                  | 28/04/2019        |                   |           |
| <b>Officer</b>   |                       |  | <b>Application Number(s)</b>     |                  |                   |                   |           |
| Matthias Gentet  |                       |  | 1) 2019/1283/P<br>2) 2019/1744/A |                  |                   |                   |           |
| <b>Application Address</b>   |                       |  | <b>Drawing Numbers</b>           |                  |                   |                   |           |
| 17 Woburn Place<br>Bloomsbury<br>London<br>WC1H 0LN  |                       |  | Refer to Decision notice         |                  |                   |                   |           |
| <b>Proposal(s)</b>   |                       |  |                                  |                  |                   |                   |           |
| 1) Installation of an Automated Teller Machine (ATM) to Coram Street elevation.<br>2) Display of an internally illuminated Automated Teller Machine (ATM) surround and 1 x internally illuminated projecting sign to Coram Street elevation. |                       |  |                                  |                  |                   |                   |           |
| <b>Recommendation(s):</b>  |                       | 1) Refuse Planning Permission<br>2) Refuse Advertisement Consent   |                                  |                  |                   |                   |           |
| <b>Application Type:</b>   |                       | 1) Full Planning Permission<br>2) Advertisement Consent  |                                  |                  |                   |                   |           |
| <b>Conditions or Reasons for Refusal:</b>  |                       | Refer to Draft Decision Notice   |                                  |                  |                   |                   |           |
| <b>Informatives:</b>   |                       |  |                                  |                  |                   |                   |           |
| <b>Consultations</b>   |                       |  |                                  |                  |                   |                   |           |
| <b>Adjoining Occupiers:</b>  |                       | No. notified   | <b>00</b>                        | No. of responses | <b>00</b>         | No. of objections | <b>00</b> |
| <b>Summary of consultation responses:</b>  |                       | No comments were received in response to the statutory consultations carried out in the form of a <b>Site Notice</b> displayed on 03/04/2019 and expired on 27/04/2019, a <b>Press Advert</b> published on 04/04/2019 and expired on 28/04/2019, and <b>Consultation Letters</b> sent out on 01/04/2019 and expired on 22/04/2019. |                                  |                  |                   |                   |           |
| <b>CAAC/Local groups comments</b>  |                       | No comments were received.   |                                  |                  |                   |                   |           |

## Metropolitan Police

An objection from **The Metropolitan Police** was received, summarised as follows :

- The area has already a high number of ATM devices within a short walk from the closest tube station of Russell Square and these currently suffer from crime and anti-social behaviour.
- Predominately this manifests itself in the form of begging, which can be quite aggressive and intimidating to people just walking by.
- The addition of another location which could be used for anti-social behaviour is a concern.
- The area has a large number of hotels, famous tourist attractions and student halls of residence and is populated with many people from around the world who can be taken advantage of due to their naivety of the local crime issues.
- Other crimes associated with ATM's within the area are distraction thefts on people using the device and bogus police officers following people seen withdrawing large amounts of cash and then pretending to stop them whilst stealing their money.

The officer identified a series of recommendations be made with regards the physical security of the ATM device, in the event that proposals are supported.

Officer's Response:

*Please see paragraphs 6.2 to 6.5 in the below report.*

## Site Description

The site address is an 8-storey plus basement and roof mansard 19<sup>th</sup> century corner building located on the north-eastern side of Woburn Place with Coram Street to the south. It is occupied at ground floor level by a Bureau de Change (Class A2) with residential at upper floors (Witley Court). The building is part of an avenue of large and tall buildings predominantly of commercial uses including hotels and student accommodations.

The property sits in Bloomsbury Conservation Area. Though not listed, it is noted to be a 'Positive Contributor' in the Bloomsbury Conservation Area Appraisal.

## Relevant History

### Site History:

**2008/0950/A** – (granted on 29/04/2008) - Display of illuminated fascia sign above an ATM.

**2008/0946/P** – (granted on 29/04/2008) - Installation of an ATM within the shop window.

### Relevant Sites within Camden

#### **No56 Tavistock Place**

**2018/0212/A** – (**refused** on 07/03/2018) - Display of an internally illuminated Automatic Teller Machine (ATM) surround.

### Reasons for Refusal:

- 1) *The proposed internally illuminated surround, by reason of its design, location and method of illumination, would be an incongruous feature within the shopfront, causing harm to the character and appearance of the host building, the shopping parade and the Conservation Area, contrary to policies A1, D2 and D4 of the Camden Local Plan 2017.*

**2018/0134/P – (refused on 07/03/2018)** - Installation of an Automatic Teller Machine (ATM) with illuminated surround and associated changes to the shopfront.

Reasons for Refusal:

- 1) *The proposed Automatic Teller Machine and associated alterations to the shopfront, by virtue of its design, location, materials and method of illumination, would be an unsympathetic and incongruous feature in the shopfront that would be detrimental to the character and appearance of the host building, the shopping parade and the Conservation Area, contrary to policies A1, D1, D2 and D3 of the Camden Local Plan 2017.*

**No18 Camden Road**

**2017/6841/L – (refused on 06/04/2018)** - Installation of an Automated Teller Machine (ATM) with associated changes to the shopfront.

Reasons for Refusal:

- 1) *The proposed development, by reason of its unsympathetic design and location, would be harmful to the special interest of the Grade II listed host building and the setting of the adjoining terrace of listed buildings, contrary to policy D2 (Heritage) of the London Borough of Camden Local Plan 2017.*

**2017/6748/A – (refused on 06/04/2018)** - Display of an internally illuminated ATM surround.

Reasons for Refusal:

- 1) *The proposed signage, by reason of its location and method of illumination, would obscure the shopfront and result in visual clutter, to the detriment of the special interest of the listed building and the adjoining parade of shopfronts, contrary to policies D1 (Design) and D2 (Heritage) of the London Borough of Camden Local Plan 2017.*

**2017/6218/P – (refused on 06/04/2018)** - Installation of an Automated Teller Machine (ATM) to shopfront.

Reasons for Refusal:

- 1) *The proposed installation of the ATM, by reason of its unsympathetic design and location, would cause harm to the appearance of the host listed building and the adjoining parade of shopfronts, contrary to policies D1 (Design) and D3 (Shopfronts) of the London Borough of Camden Local Plan 2017.*
- 2) *The proposed ATM in this location would be likely to contribute to opportunities for increased crime and anti-social behaviour in the area, to the detriment of community safety and security, contrary to policy C5 (Safety and Security) of the London Borough of Camden Local Plan 2017.*

**No26 Camden Road**

**2017/6844/L – (refused on 28/02/2018)** - Installation of an (Automated Teller Machine) ATM with associated changes to the shopfront and roller shutter.

Reasons for Refusal:

- 1) *The proposed development, by reason of unsympathetic design, would be harmful to the special interest of the Grade-II listed host building, contrary to policy D2 (Heritage) of the London Borough of Camden Local Plan 2017.*

**2017/6766/A – (refused on 28/02/2018) - Display of an internally illuminated ATM surround.**

Reasons for Refusal:

- 1) *The proposed signage by reason of its location and method of illumination would obscure the shopfront and result in visual clutter, to the detriment of the special interest of the listed building and the adjoining parade of shopfronts, contrary to policies D1 and D2 of the London Borough of Camden Local Plan 2017.*

**2017/6220/P – (refused on 28/02/2018) - Installation of an Automated Teller Machine (ATM) and modification to roller shutter and shopfront.**

Reasons for Refusal:

- 1) *The proposed installation of the ATM by reason of its unsympathetic design would cause harm to the appearance of the host building and parade of shopfronts contrary to policies D1 (Design) and D3 (Shopfronts) of the London Borough of Camden Local Plan 2017.*
- 2) *The proposed ATM would be likely to contribute to opportunities for increased crime and antisocial behaviour in the area, to the detriment of community safety and security, contrary to policy C5 (Safety and Security) of the London Borough of Camden Local Plan 2017.*

## **Relevant policies**

### **National Planning Policy Framework 2019**

### **The London Plan 2016 and The Draft London Plan 2019**

#### **Camden Local Plan 2017**

A1 – Managing the Impact on Development

C5 – Safety and Security

C6 – Access for all

D1 – Design

D2 – Heritage

D3 – Shopfronts

D4 - Advertisements

#### **Camden Planning Guidance 2018 (as amended)**

CPG – Advertisement 2018

CPG – Amenity - 2018

CPG1 – Design – Chap 2, 3, 7 & 9

#### **Bloomsbury Conservation Area Appraisal (April 2011)**

#### **Town and Country Planning (Control of Advertisements) (England) Regulations 2007**

### 1. Proposal and Background

- 1.1 Planning Permission is sought for the installation of an Automated Teller Machine (ATM) to the Coram Street elevation of the premises.
- 1.2 Advertisement Consent is sought for the display of an internally illuminated Automated Teller Machine (ATM) surround and 1 x internally illuminated projecting sign to Coram Street elevation.
- 1.3 It is noted that the addition of an ATM was approved in 2008 under application reference: 2008/0946/P [See Relevant History above] and was installed within the right hand size glazing display of Coram Street frontage. Advertisement Consent for the illuminated ATM surround was also granted in 2018 under application reference: 2008/0950/A [See *Relevant History above*]. The ATM was briefly put in place but subsequently removed. No reasons for the short length of the installation and reasons for its removal have been provided.
- 1.4 The existing shopfront consists of an aluminium frame fully glazed frontage with entrance doors on both Coram Street and Woburn Place elevations. The shopfront and proliferation of associated signage detracts from the character and appearance of the host building. The existing signage consists of:
- Woburn Place Frontage:
- 2no illuminated fascia signs – one affixed onto the stonework fascia and one onto the shopfront
  - 2no illuminated projecting signs affixed onto the decorative stone work
  - A further 2no advertisement – one illuminated and the other non-illuminated – installed behind the glazing
- Coram Street Frontage:
- 3no illuminated fascia signs – 2no affixed onto the stonework fascia and one onto the shopfront
  - 2no illuminated projecting sign affixed onto the decorative stone work
  - A further 2no advertisement – one illuminated and the other non-illuminated – installed behind the glazing



- 1.5 CPG Design (Shopfront) and CPG Advertisements clearly states that signage would be limited to one fascia and one projecting sign per shopfront elevation.
- 1.6 The submitted drawings of both frontages (on Coram Street and Woburn Place) lack accuracy and appear to be inconsistent and understate the proliferation of in-situ signage .

## 2. Assessment

2.1 The principle considerations in the determination of both applications are:

- Design and Heritage
- Access for All
- Amenity
- Public Safety (Transport, Anti-social Behaviour and Illumination)

## 3. Design and Heritage

### Automatic Teller Machine (ATM)

- 3.1 The Automatic Teller Machine (ATM) is to be installed within the left hand glazing panel area that forms part of the shopfront. The existing glass pane measures approximately 2.6m in height by 0.6m in width. The ATM would measure approximately 0.9m in height by 0.4m in width and 0.27m in depth (thickness) at the most projecting part of the fixture from the shopfront elevation. Together with the illuminated surround, the complete fixture would measure approximately 1.11m in height by 0.55m in width. It would sit at approximately 1.9m from the top of the ATM to the pavement level and 0.8m from its base to pavement level. The bottom glazing panel is to be retained. However, the glass panel situation above the ATM is to be replaced with white laminated Security Panel.
- 3.2 The existing shopfront with fully glazed elevations in an aluminium framing is an unsympathetic addition within the lower part of a building of architectural merit. It is in contrast with the more traditional shopfront with stall riser which would be the preferred approach on the host building which is identified in the Bloomsbury Conservation Area Appraisal as a positive contributor along with No18, No19-29 Woburn Place next door.
- 3.3 CPG1 (Design) states that *'Conservation area designation is a way to recognise the importance of the quality of an area as a whole, as well as giving some protection to individual buildings within it. Conservation areas are not designated to stop all future development or change but to ensure that change is managed to conserve the historic significance of the area as a whole. The Council will only permit development within conservation areas, and development affecting the setting of conservation areas, that preserves and enhances the character and appearance of the area.'*
- 3.4 CPG1 (Design) goes on to states that *'Cash machines (also known as cash points and ATMs) are only likely to be acceptable provided they are treated as an integral part of a building's design wherever possible and not dominant in the shop display frontage in terms of size or materials.'*
- 3.5 This is further supported by policy D1 of the Camden Local Plan that stipulate that *'Good design takes account of its surroundings and preserves what is distinctive and valued about the local area. Careful consideration of the characteristics of a site, features of local distinctiveness and the wider context is needed in order to achieve high quality development which integrates into its surroundings. Architectural features on existing buildings should be retained wherever possible, as their loss can harm the appearance of a building by eroding its detailing. The insensitive replacement of windows and doors can spoil the appearance of buildings and can be particularly damaging if the building forms part of a uniform group.'*
- 3.6 The unsympathetic alterations to the commercial frontage would further erode the appearance of the shopunit, contrary to policy D2 of the Camden Local Plan 2017 which states that *'The Council places great importance on preserving the historic environment. The Council must pay special attention to **preserving or enhancing the character or appearance of conservation areas.*** Its presence would therefore be detrimental to the character and appearance of the

host building and the conservation area, contrary to policies D1 and D2.

#### 4. Access for All

4.1 Policy C6 (Access for all) states that *'Good access and inclusion benefits everyone. The Council will seek to promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities.'*

4.2 It is unclear, judging by the details of the ATM where the keyboard is to be located within the machine, and as such, it isn't possible to provide actual distance between the keypad area and the floor. However in the event that an acceptable design approach were achieved it would be possible to secure further details of this aspect as part of a future planning application or by condition.

#### 5. Amenity

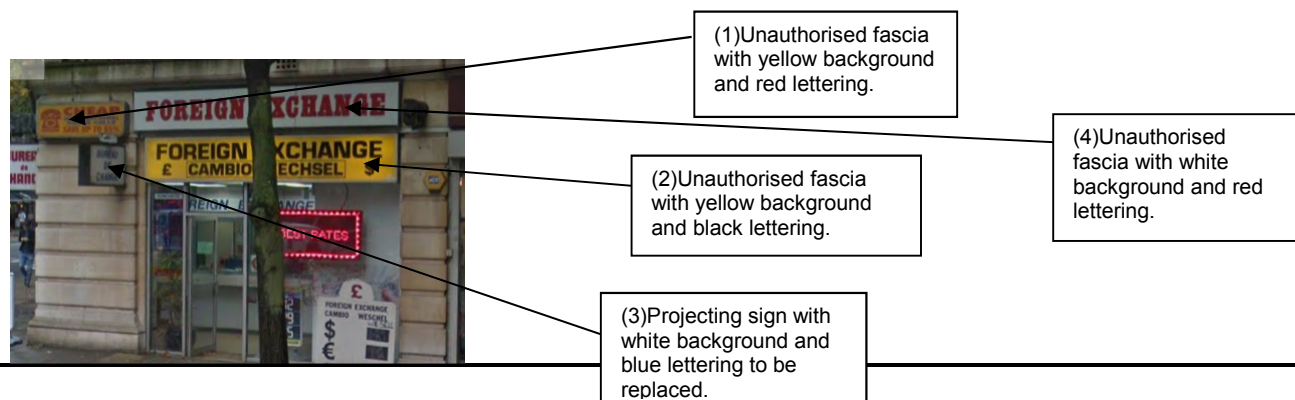
##### ATM Illuminated Surround Sign

5.1 The internally illuminated surround would frame the ATM. It would measure approximately 0.55m in width with a thickness of 55mm by 1.2m in height and would project by 0.27m. It would include an advertising fascia measuring approximately 438mm in width by 142mm in height. The signage would consist of a blue plastic surround and a white background fascia with blue 'ATM' letters. The design of the surround is not traditional or contextual.

5.2 Its illumination would also introduce yet more illuminance within the commercial frontages. Illuminated signage are normally found at fascia level and include a fascia and a projecting sign. CPG1 (Design) states that *'signs are among the most prominent forms of advertising on buildings. However, signs that are unsympathetically designed can cause significant harm to the building and the local townscape. Signs should relate well to the character, scale and architectural features of the building and respect their local context.'* It is evident that the illuminated advertising surround, by virtue of its design, illumination and location would add to the unsympathetic nature of the proposals and is a contributing factor in the resulting harm.

##### Projecting Sign 'Wall Signage'

5.3 The proposed projecting sign would measure approximately 0.40m in height by 0.40m in width and 50mm in depth (thickness). It would be internally illuminated and would consist of white acrylic faces with blue 'ATM' letters within an aluminium frame. It is unclear how the new projecting sign is to be affixed on the elevation as no fixing details have been provided. It can be assumed that it is to be anchored into the stone work in the same fashion as the existing internally illuminated projecting sign (3) it is to be replaced, and that is located below the short illuminated fascia (1) with yellow background and red lettering (unauthorised) located on the stone work details and in line with another unauthorised fascia (2) with yellow background and black lettering located on the shopfront as shown below:



5.4 However, it is unclear where the proposed projecting sign – referred to as ‘Wall Sign’ – is to be displayed. The existing and proposed elevation do not show the unauthorised fascia (1) and (2) and the details of the lettering advertising part of the fascia are also different to the actual fascia (4) in situ. Furthermore, the existing and proposed projecting signs appear to be located adjacent to and in line with another unauthorised fascia sign (4), and the size and design of the proposed projecting sign – rectangular - is not consistent with the details of the said signage – square.

5.5 Although the proposed location of the proposed projecting sign – adjacent to and in line with the fascia (4) would be acceptable, the conflicting details of the projecting sign as provided make an accurate assessment of this element of the development impossible. Similar to the illuminated ATM surround, its illumination would also introduce another source of illuminance within the commercial frontages and would be an incongruous feature adding there too another insensitive alteration to the already altered ground floor facade.

5.6 As such, the illuminated projecting is detrimental to the character and appearance of the host and adjacent building, Conservation Area and streetscape.

## 6. Public Safety

### Transport

6.1 The ATM would be installed on the Coram Street frontage of the premises. Pedestrian footfall on Coram Street would be low, certainly when compared against Woburn Place which is a busier street. The Council’s records indicate that the footway adjacent to the Coram Street frontage is approximately 4 metres wide. The proposal is unlikely to generate significant queues of people waiting to use the ATM. It would not therefore create significant pedestrian congestion on the adjacent footway. The proposal is therefore acceptable from a transport point of view.

### Anti-Social Behaviour

6.2 The Metropolitan Police has confirmed that *‘The area has already a high number of ATM devices within a short walk from the closest tube station of Russell Square and these currently suffer from crime and anti-social behaviour. Predominately this manifests itself in the form of begging, which can be quite aggressive and intimidating to people just walking by.’*

6.3 It further confirms that *‘the Bloomsbury area is currently suffering from a high number rough sleepers. The addition of another location which could be used for anti-social behaviour is a concern. Other crimes associated with ATM’s within the area are distraction thefts on people using the device and bogus police officers following people seen withdrawing large amounts of cash and then pretending to stop them whilst stealing their money.’*

6.4 Policy C5 (Safety and Security) clearly states that *‘Consideration of how crime, disorder and fear of crime can be addressed is an important element in good design. The Council will require all developments to incorporate appropriate design to help reduce opportunities for crime, the fear of crime and to create a more safe and secure environment.’*

6.5 In view of the Metropolitan Police findings in terms of crime and anti-social behaviour in the area surrounding the premises, it is clear that the proposal and its location is contrary to policy C5 as it would participate, if not encourage, the perpetrating of criminal activities and anti-social behaviour, and as such would be unacceptable. The proposals may also serve to undermine initiatives taken by the Council to reduce rough sleeping and anti-social behaviour



(the Camden Routes off the Streets programme).

### Illumination

- 6.6 Policy D4 (Advertisements) of the Camden Local Plan 2017 states that advertisements will not be considered acceptable where they impact upon public safety.
- 6.7 The method of illumination of the ATM surround and projecting sign is commonly used and present no safety issues or concerns. The proposal is, on this point, considered acceptable.

## **7. Conclusion**

- 7.1 The proposed Automatic Teller Machine and associated alterations to the shopfront, by virtue of its design, would be an unsympathetic feature in the shopfront which would be detrimental to the character and appearance of the host building and the Conservation Area, contrary to policies A1 (Managing the Impact on Development), D1 (Design), D2 (Heritage) and D3 (Shopfronts) of the Camden Local Plan 2017.
- 7.2 The proposed Automatic Teller Machine, by virtue of its location, would contribute to opportunities for crime and anti-social behaviour, contrary to policy C5 (Safety and security) of the Camden Local Plan 2017.
- 7.3 The illuminated advertisement on the ATM, by virtue of its design, location and illumination, would be an unsympathetic feature in the shopfront which would be detrimental to the character and appearance of the host building and the Conservation Area, contrary to policies D1 (Design), D2 (Heritage), D4 (Advertisements) of the Camden Local Plan 2017.

## **8. Recommendation**

- 8.1 Refuse Planning Permission.
- 8.2 Refuse Advertisement Consent.