

**REF: R00154/MC/MR**

Planning  
London Borough of Lambeth  
PO Box 734  
Winchester  
SO23 5DG

19 August 2019

Dear Sir/Madam,

**APPLICATION FOR ADVERTISEMENT CONSENT AND EXTERNAL ALTERATIONS TO SHOPFRONT  
19 HIGH HOLBORN, LONDON, WC1R 5JA**

I write on behalf of the Applicant, Tesco Stores (Tesco), to submit an application for advertisement consent and external alterations to the shopfront at the above site.

**Background**

The site is currently under construction and will comprise a Class A1 ground floor retail unit located on High Holborn. The upper floors of the building will comprise office floorspace (Class B1). The site lies directly adjacent to a Grade II Listed Gatehouse fronting on to High Holborn at Gray's Inn and is also situated close to the Bloomsbury Conservation Area.

Planning permission (LPA ref. 2016/6785/P) was granted for the redevelopment of the site, subject to a Section 106 Agreement, on 13<sup>th</sup> December 2016. Specifically, planning permission was granted for:

*'Refurbishment, extension and part change of use of existing building to provide a mixture of uses including retail, office and ancillary uses, involving roof, rear and basement extensions comprising 621 sq. m (GEA) of additional floorspace and associated plant. Two existing residential units to be provided at 12 Gray's Inn Square as part of a land use swap.'*

Listed building consent was also granted subject to a Section 106 Agreement on 13<sup>th</sup> December 2016 (LPA reference: 2016/6787/L) relating to works to 21 High Holborn.

**Proposed Works**

Alterations to Shopfront

Careful consideration has been given to the proposed shopfront alteration due to the site's proximity to a conservation area and the Grade II listed Gatehouse adjacent. Specifically, the alterations propose:

- A new powder coated aluminium shopfront;
- Automatic aluminium bi-parting doors;
- Powder coated aluminium ventilation louvers; and
- A signage zone.

All aluminium features will be painted grey (RAL 7016).

### Proposed Advertisements

Advertisement consent is sought for the display of 1no. fascia sign and 1no. projecting sign.

The fascia sign is proposed with Tesco branding. The letters only are proposed to be internally illuminated and will not exceed 300-400 Cd/m. A new internally illuminated projecting sign is also proposed.

Further details and dimensions of the proposed signage are included on the accompanying drawing no. Existing & Proposed Shopfront Elevations (drawing no. 17.035/300 Rev. F), prepared by Factor9 Architects. The advertisements are required to display the incoming tenant's branding.

### **Planning Policy Context**

The London Borough of Camden's Development Plan comprises the Camden Local Plan (adopted July 2018) and the London Plan (March 2016).

Material considerations include the National Planning Policy Framework (NPPF) (adopted February 2019), the supporting Planning Practice Guidance (PPG), Adverts CPG (March 2018) and the draft London Plan 'Consolidated Suggested Changes' version (July 2019).

The site is identified in the London Plan as part of an intensification area. The site falls within the CAZ and is specified in the Camden Local Plan as being within the Holborn Growth Area. The site is also designated as a 'Central London Frontage'.

### The Development Plan

Policy D3 (Shopfronts) seeks to ensure a high quality of design for shopfront alterations. Consideration will be given to; the design, the character of the building and surrounding area, characteristics of shopfronts in the area, safety and accessibility when determining such planning applications.

Policy D4 (Advertisements) requires advertisements to preserve or enhance the character of their setting and host building and be of the highest standard of design, material and detail. The Council 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.'*

## Material Considerations

### *National Planning Policy Framework*

The NPPF is a key material consideration. It is underpinned by a presumption in favour of sustainable development and in terms of that presumption, Paragraph 11 states that for decision taking this means *'approving development proposals that accord with an up-to-date development plan without delay...'*

Paragraph 127 states that planning decisions should, inter alia, *'create places that are safe, inclusive and accessible'*.

Paragraph 80 goes on to advise that *'planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth.'*

Paragraph 132 of the NPPF addresses advertisements, affirming the requirement for LPA's to determine applications for advertisement consent simply in the interests of amenity and public safety, taking account of cumulative impacts.

### *Planning Practice Guidance*

Paragraph 26 of the PPG sets out the criteria for deciding applications and appeals involving advertisements. Overall, it states that such proposals are to be considered on their own merits, with regard to the general characteristics in the locality in which they are to be displayed. The PPG states:

*'Unless the nature of the advertisement is in itself harmful to amenity or public safety, consent cannot be refused because the local planning authority considers the advertisement to be misleading (in so far as it makes misleading claims for products), unnecessary, or offensive to public morals.'*

Turning to the second key consideration of public safety, paragraph 28 examines what considerations local authorities should take into account in assessing public safety, emphasising that public safety is not confined to road safety and includes all of 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). Paragraph 68 specifically examines the main types of advertisements that may cause a danger to road users, stating the matters that should be considered by LPAs when making decisions.

### *Draft London Plan*

Draft Policy D7 (Public realm) seeks to ensure that *'lighting, including for advertisements, should be carefully considered and well designed in order to minimise intrusive lighting infrastructure and reduce light pollution.'*

## **Planning Justification**

### Shopfront Alterations

The principle of development is established and the only material consideration relates to design. Overall the alterations do not significantly alter the material appearance of the existing retail unit and are considered acceptable.

The proposals seek to bring the shopfront in line with the requirements of the incoming tenant. The proposal will maintain the existing retail character of the area and would not have an unacceptable impact in terms of amenity. The proposed changes update the permitted unit, helping to improve the quality of the built environment and providing improved access. On this basis the proposals comply with Policy D3.

The alterations will be completed to a high quality and to a scale, appearance and function that is wholly appropriate given its immediate context.

### Advertisement Consent

Advertisement proposals must be determined solely in the interests of amenity and public safety. To this end, the case in favour of the proposals is set out below.

#### *Amenity*

Amenity is something which can be interpreted differently by each LPA, the PPG advises that this is the visual or aural effect of the advertisements on the immediate area.

The site is located in a well-established commercial area where signage, including illumination, is part and parcel of the surrounding uses. The proposed signage is not only in-keeping with the character of the area but is a vital component for retailers. It is, therefore, considered there will not be a harmful visual (or aural) effect on the surrounding buildings or be visually intrusive to passers-by, employees or visitors to the site.

Internal illumination of the letters within the fascia sign is proposed. The level of illumination of the sign will not exceed 400 Cd/m. The effect of this level of illumination would be to create a 'soft glow'. The fascia sign will not have a detrimental impact on visual amenity.

Finally, a single projecting sign, with internal illumination, is proposed. Such signs are commonplace in the surrounding area. A projecting sign had previously been in place at the site prior to its redevelopment and, therefore, the proposal will not result in visual clutter.

The proposed signage is similar to the signage which was in place prior to the site's redevelopment. In light of this, the proposed advertisements do not pose any harm the character and appearance of the adjacent listed building or nearby conservation area.

### *Public Safety*

The second key consideration in the context of an advertisement proposal is whether it adversely impacts upon public safety. This is not confined to road safety and other matters including pedestrian safety are clearly important. The proposed signage is located away from areas within reach of customers and will not cause an obstruction. It is therefore considered that the proposals will have no impact on public safety due to their siting and design in accordance with Policy D4.

### **Summary and Conclusion**

Given the nature of the site and the surrounding area, we consider that the proposed shopfront alterations and signage are acceptable and in accordance with established policies.

The site is located within an established commercial area, and it is considered that the proposed signage is appropriate to the site context. In accordance with the NPPF and PPG, the signage and illumination would not have an impact on public safety or amenity.

It is considered that there are no policy grounds for objection to the application proposal. The proposed shopfront and advertisements are therefore considered to be entirely acceptable.

### **Content of Advertisement Consent Submission**

The following additional supporting documents have been submitted via planning portal (ref. PP-08014082) in support of this application:

- The relevant planning application fee of £132.00;
- The completed application form;
- Site Location Plan (Drawing no. 17.035/01);
- Existing & Proposed Shopfront Elevations (Drawing no. 17.035/300 Rev. F); and
- External Elevations (Advertisement Details) (Drawing no. 02\_5888\_02).

### **Content of External Alterations Application Submission**

The following additional supporting documents have been submitted via planning portal (ref. PP-08017162) in support of this application:

- The relevant planning application fee of £234.00;
- The completed application form;
- Site Location Plan (Drawing no. 17.035/01); and
- Existing & Proposed Shopfront Elevations (Drawing no. 17.035/300 Rev. F).

I trust that you have all the information you require to validate this application. If, in the interim, you have any queries please do not hesitate to contact either Matthew Roe ([matthew.roe@rokplanning.co.uk](mailto:matthew.roe@rokplanning.co.uk)) or myself at this office. I look forward to your formal acknowledgement of the application.

Yours sincerely,

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