
Planning and Heritage Statement

RANK – St Giles Casino

Tottenham Court Road

September 2019

Planning Statement

RANK – St Giles

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1.0 INTRODUCTION

- 1.1 This Planning and Heritage Statement has been prepared by Barton Willmore LLP on behalf of Grosvenor Casino's Limited (the 'Client') pursuant to a full planning application for the addition of advertisements to the exterior of the St Giles Casino on Tottenham Court Road (the 'Site'). The Site falls within the jurisdiction of the London Borough of Camden.
- 1.2 This statement provides the planning rationale for the proposed development whilst at the same time demonstrating the application's compliance with the current Development Plan and National Planning Policy Framework. This Statement also includes a specific Heritage Assessment following the identification of heritage assets in the vicinity of the site.
- 1.3 This statement concludes that the proposed advertisements accords with national policy and would not cause any material harm to public safety or amenity, and as a result, should be supported by the London Borough of Camden.

2.0 THE SITE AND PROPOSED DEVELOPMENT

- 2.1 The proposal seeks the provision of a new advertisement on the exterior of the existing casino at the St Giles Casino. The casino is accessed directly from Tottenham Court Road, where a ground floor reception is located. The main casino occupies the first floor of the building.
- 2.2 The existing exterior displays as a series of windows on the upper floor of the entrance of the casino, with other retail shops on the ground floor. The new advertisement will supersede the existing windows and a previous light display (which did not require advertisement consent) promoting the casino. The detail design of the new advertisement is shown on drawing PL005 rev A.
- 2.3 The advertisements are in the form of vinyl prints that are externally applied to the existing windows at the site. The proposed wording seeks to advertise the content within the building. It is supplemented by trough lighting located above the windows areas. The proposed troughs vary in size, dependent upon the location, and this is clearly demonstrated on drawing PL005 rev A.
- 2.4 The Site falls within the defined Central London Area and Central London Frontage as noted on the London Borough of Camden's Policies Map (March 2019).
- 2.5 Recent planning applications relevant to this application are summarised in the table below.

Reference	Description	Decision
2015/4170/P	Removal of recessed shop frontage including re-positioning of front entrance and installation of new fascia sign.	Granted 23-09-2015
2014/3182/A	Display of 1x fascia sign to front elevation.	Granted 18-06-2014
2008/3179/A	Display of four internally illuminated fascia signs at ground floor level and 3 x externally illuminated banner signs at first floor level.	Part Granted/Refused 18-08-2008
2007/6376/P	Installation of new shopfront in connection with Casino and part Betting Office.	Granted 04-03-2008

2007/1763/P	Change of use of part ground floor from ancillary casino accommodation (Sui Generis Use Class) to licensed betting office (Use Class A2).	Granted 06-08-2007
2007/0955/P	Removal of existing window and erection of a new terrace with glazed balustrade at first floor level on the Great Russell Street elevation to existing casino (Sui Generis).	Granted 23-04-2007
2006/5771/A	Display of internally illuminated, built up letters on fascia, two ground floor advertisement panels and two advertisement columns under the entrance canopy, together with 5 non illuminated banner signs at fascia level along the Tottenham Court Road elevation.	Refused 07-02-2007
2006/3628/P	Change of use from hotel staff area (Class C1) to casino-gaming area (Class D2) at ground floor level in connection with the existing casino-use at first floor level.	Granted 27-09-2006
2004/0406/A	Display of two illuminated fascia sign at entrance level.	Granted 05-03-2004

- 2.6 The Site therefore has a long history with regard advertisement consents, a number of which have been supported.

Site Surrounding Area

- 2.7 The Site is bounded by Tottenham Court Road (A400) and Great Russell Street. The casino has a street-level entrance exactly located at the corner of the intersection between Tottenham Court Road (A400) and Great Russell Street. Above the casino is the St Giles London Hotel.
- 2.8 To the north of the entrance on the street level are retail shops, including the Coral Betting shop, electronics outlet, and a sandwich café. Directly opposite the casino to the west are a number of commercial units. There are examples of advertisements at first floor level in this location, including at Boots and Muji. There is further first floor signage at Ping Pong along Great Russell Street.

- 2.9 There are listed buildings in the vicinity of the site. To the south, 5 Great Russell Street is grade II listed, as are nos. 8-12. To the northern side of Bayley Street, numbers 6-10 and their attached railings are grade II listed, as are buildings to the southern side of Percy Street. The site is located adjacent to a conservation area, which includes buildings to the south and east.

3.0 RELEVANT PLANNING POLICY

- 3.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that where the Development Plan contains relevant policies, applications for development which are in accordance with the plans should be allowed unless material considerations indicate otherwise. The National Planning Policy Framework (NPPF) and the Camden Planning Guidance are part of the material considerations.

Camden Local Plan (Adopted 2017)

- 3.2 Policy D2 'Heritage' states that the Council will resist development that would cause harm to significance of a listed building through an effect on its setting. The Heritage chapter below confirms this would not be the case.
- 3.3 Policy D4 'Advertisements' highlights that proposed advertisements are required 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. Advertisements that preserve the character and amenity of the area, preserve or enhance heritage assets and conservation areas will be supported. This application does not identify any harm resulting from the proposal.
- 3.4 It adds that advertisements that cause an unsightly proliferation of signage, contribute to street clutter, cause light pollution, have flashing illuminations, or impact upon public safety will be resisted. The proposal does not cause any of the negative effects listed.
- 3.5 Policy D4 also states that 'the Council will resist advertisements on shopfronts that are above fascia level or ground floor level, except in exceptional circumstances'. Whilst the advertisement is at first floor level, no harm has been identified that would preclude development.
- 3.6 Advertisements will only be acceptable at fascia level or below. Advertisements above fascia level can appear visually obtrusive and unattractive and, where illuminated, they can cause light pollution to neighbouring residential properties. If an advertisement is required at high level for a specific business use then this will usually be restricted to non-illuminated images on windows. The proposed lighting through four individual troughs is subtle and would not cause any material light pollution.

Camden Planning Guidance - Advertisements (March 2018)

- 3.7 The Camden Planning Guidance forms the Supplementary Planning Documents (SPD) which is part of the material considerations.
- 3.8 As a general guide, the document states that the most satisfactory advertisements are those which take into account the character and design of the property, its surroundings and alter the external fabric of the host building as little as possible. Advertisements will not be considered acceptable where they adversely impact upon amenity and public safety. No negative impact upon amenity or public safety have been identified as part of the application.

National Planning Policy

- 3.9 The NPPF sets out the Government's planning policies for England and how these are expected to be applied.
- 3.10 Paragraph 8 of the NPPF notes the three overarching objectives to achieve sustainable development. These are economic, social and environmental objectives. Paragraph 10 states that to ensure sustainable development is pursued in a positive way, there is a presumption in favour of sustainable development at the heart of the Framework.
- 3.11 Paragraph 11 confirms that for decision making, development proposals that accord with an up-to-date development plan should be approved without delay.
- 3.12 In terms of building a strong, competitive economy, paragraph 80 states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt.
- 3.13 Paragraph 132 notes that the quality and character of places can suffer when advertisements are poorly sited and designed. It confirms advertisements should be subject to control only in the interests of amenity and public safety, taking into account cumulative impacts. This is expanded upon within the Planning Practice Guidance (PPG). No harm to amenity of public safety has been identified that would preclude development.

4.0 ASSESSMENT OF THE PROPOSALS

- 4.1 This chapter assesses the planning and advertisement proposals against the Council's Development Plan, material considerations and national planning policy. The following chapter considers the proposal in relation to identified heritage assets.
- 4.2 The casino is located within the designated Central London Area and Central London Frontage. It is situated adjacent to numerous commercial units, all of which have appropriate signage. The casino has a ground floor entrance onto Tottenham Court Road. However, this is only a small area, and additional signage is required to allow wayfinding to the venue. It therefore provides a practical purpose for the building.
- 4.3 The proposed first floor advertisements consists of a vinyl sheet attached directly to the exterior of the existing window. They will be illuminated by four separate trough lights ranging between 2.5m and 5.8m in length. The majority of the advert across the site would not therefore be illuminated.
- 4.4 Policy D4 of the Camden Local Plan seeks to prevent first floor signage except in exceptional circumstances. This is at odds with the content of the Camden Planning Guidance; Advertisements document, which implies in paragraph 1.9 that first floor advertisements can be acceptable although are usually expected to be non-illuminated.
- 4.5 In this instance, illumination is proposed in order to promote the business, which is predominantly at first floor level. The proposal seeks illumination through trough lighting, which ensures that illumination is more discreet and reduces the potential for any light spillage away from the site. The nature of the lighting ensures the proposal would not impact negatively upon public safety or amenity.
- 4.6 There are other examples of first floor advertisements in the immediate vicinity. Directly opposite the site, there is first floor signage for Boots, Muji and Specsavers, and there is further signage at Ping Pong adjacent to the site. The proposed first floor signage will be read in conjunction with these.
- 4.7 Whilst the aims and objectives of policy D4 in terms of first floor advertisements is noted, each advertisement must be judged on its merits. The proposal clearly does not impact upon public safety or amenity and meets and meets the other criteria within the policy. The advertisements would also not appear visually obtrusive and unattractive and would

therefore be in accordance within the guidance within the Camden Planning Guidance – Advertisement 2018. As a result, in this instance, the application should be approved.

5.0 HERITAGE ASSESSMENT

- 5.1 This chapter of the Planning and Heritage Statement seeks to identify the heritage assets on or around the site and study their history. This chapter will summarise the current policy requirements at both a national and local level. It will then analyse the significance of the site in its present form in relation to the identified heritage assets, and the proposed development will then be assessed against the same criteria.

National Planning Policy

- 5.2 Chapter 16 of the NPPF relates specifically to conserving or enhancing the historic environment. This should be read alongside the national policy content in chapter 4 of this statement.
- 5.3 Of note, Paragraph 192 states that the local planning authorities should take account of three factors when determining planning applications. These are the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness.
- 5.4 Paragraph 193 notes that the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be).
- 5.5 Paragraph 196 notes that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 5.6 Paragraph 200 guides that local planning authorities should look for opportunities for new development in conservation areas and within the setting of heritage assets to enhance or better reveal their significance. Proposals that retain positive elements of a setting should be treated favourably.

Local Planning Policy

- 5.7 For the purposes of the Heritage Statement, the Camden Local Plan consists of the policies which were adopted in 2017.
- 5.8 Policy D2 Heritage states that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.
- 5.9 Policy D2 notes that the Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.
- 5.10 Policy D2 refers to conservation areas, which are designated heritage assets. In order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas.
- 5.11 Policy D2 refers to Listed Buildings. Listed buildings are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. To preserve or enhance the borough's listed buildings, the Council will resist the total or substantial demolition of a listed building; resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and resist development that would cause harm to significance of a listed building through an effect on its setting.
- 5.12 Policy D2 confirms the Council will seek to protect other heritage assets including non-designated heritage assets (including those on and off the local list), Registered Parks and Gardens and London Squares. The effect of a proposal on the significance of a non-designated heritage asset will be weighed against the public benefits of the proposal, balancing the scale of any harm or loss and the significance of the heritage asset.
- 5.13 Policy D4 Advertisements confirms 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 Council will resist advertisements on shop fronts that are above fascia level or ground floor level, except in exceptional circumstances. Shroud advertisements, banners, hoardings/billboards/large outdoor

signboards are subject to further criteria as set out in supplementary planning document Camden Planning Guidance on advertisements.

Legislation

- 5.14 Listed buildings and conservation areas are afforded statutory protection by the Planning (Listed Buildings and Conservation Areas) Act 1990 (the Act).
- 5.15 Section 66 of the Act confers protection on the significance of listed buildings when considering applications for planning permission. It requires local planning authorities or the Secretary of State to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses in determining applications for development which affects a listed building or its setting.
- 5.16 Section 72 requires special attention to be paid to the desirability of preserving or enhancing the character or appearance of land subject to conservation area designation when exercising planning functions.

Heritage Assets

- 5.17 The application site is located across the road from a listed building, '8-12 Great Russell Street'. This building is grade II listed and the listing description is noted below:

"5 terraced houses, originally forming a terrace with No.5 (qv). Built 1746 for the Bedford Estate and refronted c1850. Brick with mid C19 stucco front, flat roofs and rendered brick stacks. 4 stores; 10 window range. C20 shop windows and doors except No.9 which has a C19 shopfront. 4-pane sashes and C20 windows set in moulded architraves (lugged to 1st and 2nd floor), with cornices to first floor. Rusticated pilaster strips to party walls, continuous sill band at 3rd floor level and moulded cornice. INTERIORS: most houses retain C18 moulded cornices, fireplace surrounds and closed string-staircase."

- 5.18 The application is located opposite a further listed building, '5, Great Russell Street'. This building is Grade II listed and the listing description is noted below:

“Terraced house now isolated but formerly with Nos 8-12 (qv). Built 1746 for the Bedford Estate and refronted C1850. Brick with mid C19 stucco front; roof not visible. 4 storeys 2 windows. C20 shop at ground floor level. 4-pane sashes set in moduled architraves with cornices to first floor. Rusticated pilaster strips to sides, string course at 3rd storey level; moulded cornice. INTERIOR: not inspected.”

- 5.19 The site is located opposite but not within the Hanway Street and Bloomsbury Conservation Areas. The boundary to the former is the western side of Tottenham Court Road, directly opposite the site. The Hanway Conservation Area was designated on 1 February 1989. The Bloomsbury Conservation Area boundary is shown on the map below, taken from the Council’s Conservation Area document. The land east of the purple line indicated is within the Conservation Area, with the application building specifically excluded. The building directly south of Great Russell Street is described as a positive building within the Bloomsbury Conservation Area, although is not a listed building in its own right.



Significance

- 5.20 The Bloomsbury Conservation Area specifically excludes the application site building, demonstrative of its lack of contribution to the area’s special architectural and historic character. It is not considered to make any positive contribution to the setting of the Conservation Area in its current form.

- 5.21 The listed buildings at Great Russell Street are located further east and do not have a direct relationship with the windowed areas where the advertisements are proposed.
- 5.22 The site is located opposite the Hanway Conservation Area. This is a small area located to the western side of Tottenham Court Road. The building directly opposite the site is a retail parade. The Conservation Appraisal notes it is a neutral contributor to the Hanway Conservation Area. The part of the conservation area opposite the site is not therefore of high sensitivity. Notwithstanding this, the application site in its current form does not make a positive contribution to the setting of the Hanway Conservation Area, confirmed by its specific exclusion from the Bloomsbury Conservation Area discussed above.

The Proposal

- 5.23 The addition of advertisements to the first floor area will be visible in the street scene. The local area is characterised by retail and commercial units, especially directly opposite the site (within the Hanway Conservation Area), where a number of shops are located, some of which have first floor signage.
- 5.24 The application site does not contribute positively to the significance of the Hanway Conservation Area in its current form, and is therefore less sensitive to change. The addition of advertisements is not considered to materially change the character of the setting, especially given its location on a Central London Frontage and the plethora of advertisement, including those at first floor level that already characterise the conservation area and its setting.
- 5.25 On the same basis, the building does not respond positively to the Bloomsbury Conservation Area. Only a small advertisement is proposed in the southern elevation of the site opposite this Conservation Area. This would be located adjacent to other such signage for Ping Pong. For the same reason the proposals are not considered to materially change the setting of this conservation area.
- 5.26 The listed buildings identified in the vicinity of the site do not have a direct frontage with the proposed advertisement. In this regard, the proposal would not detract from the significance of these buildings and how that is experienced.

Conclusion

- 5.27 Of the specific heritage assets identified in the vicinity of the application site, the proposal has been assessed against the significance of these assets. Given the existing context,

including the exclusion of the application site from the conservation areas and the retail character of the site and surrounding area, the addition of the advertisement is not considered to materially affect the significance of these adjacent assets.

- 5.28 The proposal therefore meets the aims and objectives of Policy D2 of the Camden Local Plan 2017.

6.0 CONCLUSION

- 6.1 This planning application relates to an addition of advertisement on the first floor exterior of the St Giles Casino, which will be in the form of vinyl coverings to the exterior of the existing windows, with trough lighting distributed above in four locations.
- 6.2 The proposed advertisements are located above the entrance of the casino and the ground level retail shops and are required to include wayfinding given the relatively small ground floor area which serves the casino. The proposed design and display of the advertisements are designed in high quality to promote the casino as well as respecting the street scene which is, therefore, ensured to cause no detrimental impacts to local community.
- 6.3 The advertisement does not cause any material harm to public safety or amenity and does not impact upon the identified heritage assets in the vicinity. Local Plan policy seeks to prevent first floor advertisements. However, there is no material harm identified that would preclude the advertisements in this location in this instance.
- 6.4 As such, we believe this advertisement application should be supported by London Borough of Camden and approved accordingly.

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