

HERITAGE STATEMENT

267 TOTTENHAM COURT ROAD, LONDON, W1T 7RQ

1. INTRODUCTION

- 1.1. This Heritage Statement has been prepared on behalf of Tesco Stores Ltd (the applicant) in support of an advertisement consent application to the ground floor retail unit at 267 Tottenham Court Road, London, W1T 7RQ.
- 1.2. The application proposes the following development:
 - Application for advertisement consent to install 1 no. non-illuminated box fascia, 1 no. externally illuminated built-up letters installed on glazing, 1 no. externally illuminated projecting sign and 1 no. diabond panel.
- 1.3. The remainder of this statement is set out as follows:
 - Section 2 outlines the site and surroundings including the relevant heritage designations;
 - Section 3 sets out the relevant planning policy context;
 - Section 4 details the proposal considerations against the relevant planning policy and heritage context; and
 - Section 5 provides a conclusion.

2. SITE AND SURROUNDINGS

- 2.1. The site is an existing retail unit located to the ground floor of a recently refurbished wider 6 storey building. The unit was formerly in use as a restaurant, namely a Garfunkel's restaurant.
- 2.2. The building is understood to have been constructed in the early 1800s, formerly known as The Horseshoe Tap in 1842 and earlier, later developing into the Horseshoe Hotel in 1874. The building is understood to have undergone external redevelopment in 2009, formed of white stone on all storeys with stone pilasters dividing the upper storeys.
- 2.3. The ground floor frontage consists of three separate retail units with individual shopfronts. The site shopfront is located furthest east of the building's elevation, comprised of 3 bays facing Tottenham Court Road with the entrance doors occupying the outer bay on the left-hand side.
- 2.4. Whilst the existing ground floor shop frontage is formed of a traditional shopfront with bay windows, the upper storeys benefit from extravagant and historical design features including numerous neo-classical, ionic-styled pilasters and picture windows.
- 2.5. The building falls within the Bloomsbury Conservation Area. There are also a number of listed buildings located in the surrounding area, including Grade II Dominion Theatre and 5 Great Russell Street located directly adjacent. There are also other conservation areas located in close proximity.
- 2.6. The site is located along Tottenham Court Road which is highly retail dominated. Surrounding properties are predominantly commercial in use including Five Guys, Burger King, EE phone shop and Primark. The site itself was formerly occupied as a Garfunkel's restaurant.

3. PLANNING POLICY CONTEXT

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3.1. The following planning policy documents are of relevance to the site:

- The Camden Local Plan (2017)
- London Plan (2021)
- Fitzrovia Area Action Plan (2014)
- Bloomsbury Conservation Area Appraisal and Management Strategy (2011)
- National Planning Policy Framework (2021)
- Camden Adverts SPG (2018)

The Camden Local Plan (2017)

- 3.2. Policy D1 of the Camden Local Plan (2017) requires developments to secure high quality design, that respects local context and character, is sustainable and integrates well with the surrounding streets.
- 3.3. Policy D2 states that *“The Council will preserve and, where appropriate, enhance Camden’s rich and diverse heritage assets and their settings, including conservation areas ... and locally listed heritage assets.”* Relevant to this proposal, the policy requires *“that development within conservation areas preserves or, where possible, enhances the character or appearance of the area.”*
- 3.4. Policy D4 of the Camden Local Plan (2017) stipulates a number of requirements that advertisements must fulfil. The policy 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.

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:

- a. contribute to an unsightly proliferation of signage in the area;*
- b. contribute to street clutter in the public realm;*
- c. cause light pollution to nearby residential properties or wildlife habitats;*
- d. have flashing illuminated elements; or g. impact upon public safety.*

The Council will resist advertisements on shopfronts 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.”

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Camden Adverts SPG (2018)

- 3.5. The Camden Advertisements SPG (2018) provides detailed guidance on the design and siting of advertisements. Paragraph 1.8 states that *“advertisements and signs should respect the form, fabric, design and scale of the host building and setting. All signs should serve as an integral part of the immediate surroundings and be constructed of materials that are sympathetic to the host building and the surrounding area.”*
- 3.6. Regarding advertisements in conservation areas, paragraph 1.11 states that *“Advertisements in conservation areas and on or near listed buildings require detailed consideration given the sensitivity and historic nature of these areas or buildings. Any advertisements, of whatever type, on or near a listed building or in a conservation area must not harm their character and appearance and must not obscure or damage specific architectural features of buildings.”*
- 3.7. Paragraph 1.15 details guidance on illumination outlining that *“Externally illuminated signs should be unobtrusively sized and sited. Spotlights and trough lights should be fixed and sized as discreetly as possible to avoid light pollution. Corporate designs involving internally illuminated signs may need to be modified where they are considered unsuitable, especially in residential areas, or conservation areas, or on listed buildings.”* The Council will consider intensity of illumination, surface area to be illuminated, positioning and colours when determining advertisement applications.

Camden Design SPG (2021)

- 3.8. Paragraphs 6.28 and 6.29 of the Camden Design SPG briefly detail guidance on advertisements and signs for shopfronts, stating that *“Shops and businesses need to ensure that their name and other details are clearly displayed on their premises and, as a result, 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 ... Properties should only have one main fascia sign and one ancillary projecting or hanging sign per street frontage, although two projecting signs may be appropriate in cases of large shopfronts stretching across two or more shop units. Too many adverts/signs on a property contribute to visual clutter and can detract from the appearance of the street scene.”*
- 3.9. Projecting and hanging signs, as detailed in paragraphs 6.30 to 6.32, *“should normally be level with the fascia rather than below or above it. They should be positioned to the side of the shopfront at fascia level.”*

Bloomsbury Conservation Area Appraisal and Management Strategy (2011) (BCAAMS)

- 3.10. The BCAAMS has been designed to define the special interest of the Conservation Area in order that its key attributes are understood and can be protected, and that measures are put in place to ensure appropriate enhancement. The Bloomsbury Conservation Area is located within central London, its southern boundary around 750 metres north of the River Thames.

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It covers an area of approximately 160 hectares which extends from Lincoln's Inn Fields and High Holborn to Euston Road and from King's Cross Road to Tottenham Court Road.

- 3.11. Sub Area 4: Grafton Way/Alfred Place/Tottenham Court Road (as defined in the appraisal) is of commercial character.
- 3.12. At paragraph 5.125, the appraisal details the construction and history of the wider building of 264-267, stating that it is a recently completed and *"designed by the neo-classical architect, Quinlan Terry. Constructed from stone to match neighbouring frontages, the facade boasts a series of pilasters forming a giant order; it is a scholarly interpretation of an early 20th century neo-classical commercial building."*
- 3.13. Paragraph 5.28 of the BCAAMS requires that *"Development proposals must preserve or enhance the character or appearance of the Bloomsbury Conservation Area ... High quality design and high quality execution will be required of all new development at all scales."*
- 3.14. Specifically, regarding shopfronts and advertisements, paragraph 5.49 states that *"The installation of signage in many cases requires advertisement consent; this is particularly the case for illuminated signage which can have a major impact in conservation areas. A proliferation of signage, even of an appropriate design, could harm the character of the Conservation Area."*

National Planning Policy Framework

- 3.15. 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...'
- 3.16. Paragraph 81 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.'
- 3.17. Paragraph 136 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'.
- 3.18. The following section assesses the proposals against the above relevant planning policy and heritage considerations.

4. PROPOSAL AND HERITAGE CONSIDERATIONS

Advertisement consent

Proposal

- 4.1. Advertisement consent is sought for the display of 1 no. non-illuminated box fascia, 1 no. externally illuminated built-up letters installed on glazing, 1 no. externally illuminated projecting sign and 1 no. diabond panel.

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- 4.2. The projecting hanging sign will be illuminated via trough light, and coloured red, white and blue to read 'TESCO express'. The non-illuminated box fascia will be located centrally in the arch above the window to the east of the entrance, with a woodtex strip to the base. Similarly, the externally illuminated built-up letters will be installed on the glazing in the arch above the window closest to the entrance, coloured red, white and blue to read 'TESCO express'. The diabond panel will be applied externally between the two windows closest to the entrance, providing store directory information.
- 4.3. Additional detail on the signage proposals is available on the proposed plans prepared by Tesco Feasibility Architecture (Drawing No.s 01_TOHM_01A, 03_TOHM_03A, 02_TOHM_02B, 02_TOHM_02A, 03_TOHM_03B, 02_TOHM_02C).

Considerations

- 4.4. Firstly, it is notable that the site is located along the High Street in a predominantly retail location and benefits from a retail character. Indeed, various advertisements have been in place at the site previously associated with its former occupiers. Advertisement consent (LPA ref. 2016/2967/A) was approved in 2016 for a fascia sign and projecting hanging sign and the store is a commercial unit in a high street retail location. On this basis the principle of advertisements on the site is clearly acceptable and established, not least due to its longstanding use as a retail unit.
- 4.5. The projecting sign itself will be sited to the dedicated area above the shopfront, where previous advertisements have been placed. The projecting sign and diabond panel will be located in exactly the same position as the projecting sign and brass menu box approved under LPA ref. 2009/3392/A. On this basis, the location of the projecting sign and diabond panel between the windows is clearly acceptable.
- 4.6. Local planning policy restricts internal illumination in conservation areas and thus external illumination is proposed. It is notable that there are examples of external illumination in close proximity to the site, most notably the externally illuminated Five Guys projecting sign, located at 266 Tottenham Court Road, immediately adjacent to the site. Thus, the principle of external illumination is considered acceptable in this context. Indeed, external illumination via trough light, as proposed here, is generally considered appropriate in heritage and conservation area locations including on listed buildings.
- 4.7. Policy D4 of the Camden Local Plan (2017) notes that advertisements must be sensitive to the character of the area, visually unobtrusive, well designed and well located. The proposed externally illuminated built-up letters and non-illuminated box fascia will be located centrally in the arch above the windows to the east of the entrance, matching the proportions of the window glazing. The externally illuminated hanging sign has been designed to take an unobtrusive form, being a modest 800x650mm and located 2.28m from street level. As previously mentioned, the positioning of the proposed projecting hanging sign and large diabond panel reflect the location of the projecting hanging sign and brass menu box approved under applications LPA ref. 2009/0613/A and LPA ref. 2009/3392/A.
- 4.8. The signage will display colours and lettering to reflect the branding of the intended occupier, Tesco Express. The branding and colouring are considered acceptable given the large

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variation found elsewhere along the High Street. Furthermore, the advertisements will be formed of high-quality materials and well-maintained. An Oak woodtex strip is proposed to the non-illuminated fascia panel in order to provide greater visual interest.

- 4.9. Ultimately, given the retail character of the area, the former acceptance of adverts of this nature at the site and the fact that there is clear precedent for illuminated signage in the area, the advertisements proposed here are considered to be acceptable in heritage terms and will preserve the character of the conservation area.

5. CONCLUSION

- 5.1. This Heritage Statement has been prepared to support the advertisement consent application required to facilitate the occupation of the ground floor retail unit located at 267 Tottenham Court Road, London, W1T 7RQ
- 5.2. The proposal has been considered with regards to local planning policy, local context, and historical context.
- 5.3. The principle of the externally illuminated proposed signage is established via the surrounding development and in any case the site is located within a predominantly retail location, and therefore the adverts are considered acceptable.
- 5.4. The positioning and location of the proposed signage has been approved previously under applications LPA ref. 2009/0613/A and LPA ref. 2009/3392/A.
- 5.5. Considering the amendments as a whole it is argued that the proposals preserve the character and appearance of the conservation area.
- 5.6. On this basis, it is concluded that the proposal should not be refused on heritage grounds.