

19 May 2022

VIA PLANNING PORTAL

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Dear Sir / Madam,

APPLICATION FOR EXPRESS ADVERTISEMENT CONSENT

252 TOTTENHAM COURT ROAD, LONDON, W1T 7RB

PLANNING PORTAL REF. PP-11240272

On behalf of our client, Pret A Manger (Europe) Limited ("Pret"), Savills is instructed to submit an application for express advertisement consent at 252 Tottenham Court Road, London, W1T 7RB ("the site").

Accordingly, please find enclosed:

- Application Form;
- Site Location Plan;
- Various drawings including:
 - 22-PRET-TCR252/02.1 (Existing Shopfront Elevation – Tottenham Court Road Entrance);
 - 22-PRET-TCR252/02.2 (Existing Shopfront Elevation – Morwell St Entrance);
 - 22-PRET-TCR252/02.3 (Proposed Shopfront Elevation – Tottenham Court Road Entrance); and
 - 22-PRET-TCR252/02.4 (Proposed Shopfront Elevation – Morwell St Entrance)

Payment of the appropriate fee of £132.00 has been made via the Planning Portal.

Proposals

The proposals seek express advertisement consent for the installation of:

- two internally illuminated fascia signs along the Tottenham Court Road elevation (Signs A and D);
- one external 'A' frame sign along the Tottenham Court elevation (Sign C); and
- one internally illuminated fascia sign along the Morwell Street elevation (Sign A)

The proposed signage, as illustrated on the submitted drawings and described within the application form, seek to provide an improved shopfront appearance to allow for the beneficial conversion of the existing vacant building to a Pret sandwich shop. The signage therefore is a change to the existing shop front.

Please note, any other advertisements shown on the drawings are 'inside a building' (Signs B) and thus do not require the benefit of advertisement consent by virtue of Schedule 1, Class I and Schedule 3, Class 12 of the

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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Registered office: 35 Margaret Street, London, W1G 0JD



Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (as amended) ("the Regulations"). These are shown on the submitted drawings for information only.

Assessment

The National Planning Policy Framework ("NPPF") (July 2021) and the Regulations permits the Local Planning Authority ("LPA") to only consider amenity and public safety matters in determining advertisement consent applications. These criteria are assessed below in respect of the proposed signs.

Paragraph 136 of the NPPF notes that the quality and character of places can suffer when advertisements are poorly sited and designed. The paragraph continues to note that the advertisement consent process "... *should be operated in a way in which is simple, efficient and effective. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impact*".

Amenity

The site forms one of several retail units on the ground floor of an eight-storey building, known as 252 Tottenham Court Road. The site is currently a vacant unit having last being occupied by HEMA as a department store. The site is not listed. The nearest listed entries are Number 39 and attached railings and numbers 28-39 and attached railings, adjacent Morwell St (Grade II). The site is not located within a Conservation Area, however, is adjacent to the Hanway Street Conservation Area. The proposals will have no bearing on the nearby listed buildings or conservation area, therefore is not considered further.

The Camden Local Plan (adopted July 2017) presents the planning policies that cover the period from 2016-2031.

Policy D4 (Advertisements) of the Camden Local Plan notes that advertisements should preserve and enhance the character and setting of the wider area, along with the host building. The design, material and detail of advertisements should respect the form, design and scale of the host building. The policy goes on to state that advertisements should not contribute to street clutter and cause light pollution. Further, advertisements should not have "*flashing illuminated elements*".

The Supplementary Planning Document 'Camden Planning Guidance: Advertisements' (Adopted March, 2018) provides guidance on the design and siting of advertisements. The guidance presents that good quality advertisements, generally at fascia level will be acceptable. Illuminated signage should be sympathetic to the design of the building, along with the method of illumination. The guidance further notes that "*internally illuminated box signs are discouraged. Generally, the internal illumination of individual letters, rather than the whole fascia or projecting sign on a shopfront, will be more appropriate*".

The proposed signage is positioned appropriately within the shopfront and is set well against the building's elevations and therefore would not negatively interfere with architectural details of the building as it is consistent with good design principles and the aforementioned policies. The signage is considered well scaled and located on an area of the unit, along the existing fascia level, designed to accommodate such signage. The internal illumination of the letters on the fascia signs are considered a sensitive form of illumination within this location. The proposed siting of the proposed 'A' board is considered to be appropriate in this location. The nature of the proposed signage is considered to be sensitive to the character of the building and within the wider area along Tottenham Court Road and Morwell Street.

In summary, individually and collectively, the proposed signs maintain a high standard of design, in keeping with the character and appearance of the building and its setting along Tottenham Court Road and Morwell Street. The signage has been sensitively designed to reflect the appearance of the host building's contemporary shopfront and is not at all considered to be excessive or obstructive. The materials and form of internal illumination used are respectful, in keeping with, and complimentary to the host building and setting. The signage is an important improvement to the design of the current vacant unit. The signage accords with the relevant policy as set out above and is found acceptable in respect of amenity.



Public Safety

The location of all signage is not considered harmful to pedestrians and vehicles, given the subtle appearance and illumination of the signs. The proposed signage will not interfere or obscure the general road usage for vehicles or any road signs and visibility splays. The position of the proposed 'A' board sign is consistent with similar signs along Tottenham Court Road (e.g. Holland and Barret and Ole & Steen) and is considered an appropriate location which will not interfere with the free flow of pedestrians outside the unit. The proposals therefore raise no public safety concerns.

Summary

The proposals are for the sensitive installation of signage to allow the beneficial occupation of the vacant unit by Pret. As noted above, the proposed signs are not detrimental to the visual amenity of the building or wider area and will not impose any harm on public safety. The proposals are therefore considered compliant with the necessary regulations, national and local planning policy (in so far that they can be considered) and it follows that there is full justification for approval of the application and the grant of advertisement consent.

I look forward to receiving confirmation that the application has been registered in due course and I would welcome the opportunity to discuss the details of the application with the appointed Case Officer at the earliest opportunity.

Should you require any further information, please do not hesitate to contact me.

Yours faithfully

A handwritten signature in blue ink that reads "Savills -".

Sara Dryhurst-Roberts
Graduate Planner

Enc. As above