

**REF: R00539/DB/MR**

Planning Department  
London Borough of Camden  
5 Pancras Square  
London  
N1C 4AG

9<sup>th</sup> May 2022

Dear Sir/Madam,

**APPLICATION FOR ADVERTISEMENT CONSENT TO INSTALL 1 NO. NON-ILLUMINATED BOX FASICA, 1 NO. EXTERNALLY ILLUMINATED BUILT-UP LETTERS INSTALLED ON GLAZING, 1 NO. EXTERNALLY ILLUMINATED PROJECTING SIGN, 1 NO. DIABOND PANEL.  
267 TOTTENHAM COURT ROAD, LONDON, W1T 7RQ**

I write on behalf of the Applicant, Tesco Stores Ltd (Tesco), to submit an 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 panels.

**Background to Applications**

The site consists of an existing commercial unit located to the ground floor/basement level of a wider 6-storey building which is understood to incorporate both office and residential use to the upper floors. A second commercial unit is also located to the ground floor/basement level. The wider building and the unit itself are located adjacent to the Dominion Theatre and front Tottenham Court Road. Tottenham Court Road is a key shopping street close to Oxford Street and is designated as a primary Central London Frontage. The unit is understood to have most recently been in use as a Garfunkel's restaurant but is currently vacant.

The surrounding land uses vary but are predominantly commercial, with retail and restaurant frontages located to the ground floors and offices above. Other uses included a theatre and bars exist in close proximity. The site lies within the Bloomsbury Conservation Area but is not listed. There are numerous listed buildings located nearby, including the Grade II Dominion Theatre and 5 Great Russel Street located directly adjacent. There are also other conservation areas located in close proximity.

The following available planning history is of relevance:

**LPA ref. 2004/1953/P** – Planning permission was granted on 1<sup>st</sup> October 2004 for “*Demolition of 264-267 Tottenham Court Road and the redevelopment of the site to provide a six storey building plus basement for retail (Class A1), restaurant (Class A3), office (Class B1) and 7 residential units.*”

**LPA ref. 2007/2268/P** – Planning permission was granted on 18<sup>th</sup> October 2007 for “*Amendments to planning permission dated 30th September 2004 (ref. 2004/1953/P) (for the demolition of 264-267 Tottenham Court Road and the redevelopment of the site to provide a six storey building plus basement*

*for retail (Class A1), restaurant (Class A3), office (Class B1) and 7 residential units). Granted 18/10/2007.*

**LPA ref. 2009/0359/P** – Planning permission was granted on 9<sup>th</sup> March 2009 for “Amendment to planning permission granted on 30/09/2004 (2004/1953/P) and subsequent amendment on 18/10/2007 (2007/2268/P) for a change of use of the approved Class A1 retail units A and B to Class A2 professional and financial services at basement and ground floor level.”

**LPA ref. 2009/0613/A** – Advertisement consent was granted on 16<sup>th</sup> March 2009 for “Display of 3 internally illuminated fascia signs and 1 externally illuminated projecting sign to the front facade of the restaurant.”

**LPA ref. 2009/3392/A** – Advertisement consent was granted on 21<sup>st</sup> October 2009 for “Display of externally illuminated projecting sign and internally illuminated brass menu case on Tottenham Court Road frontage to existing restaurant (Class A3).”

**LPA ref. 2010/0060/A** – Advertisement consent was granted on 9<sup>th</sup> February 2010 for “display of internally illuminated projecting sign.”

**LPA ref. 2009/2402/P** – Planning permission was granted on 11<sup>th</sup> March 2010 for “Amendments to planning permission for the demolition of 264-267 Tottenham Court Road and the redevelopment of the site to provide a six storey building plus basement for retail (Class A1), restaurant (Class A3), office (Class B1) and 7 residential units [application ref. 2004/1953 and subsequent amendments to 2007/2268/P] to permit change of use of the approved retail unit to A3 restaurant use. Granted subject to a Section 106 Legal Agreement.”

**LPA ref. 2016/2967/A** – Advertisement consent was granted on 12<sup>th</sup> July 2016 for “Display of internally illuminated (lettering only) fascia sign, externally illuminated (trough-lit) projecting sign, internally housed awnings, and menu case.”

The site is known to have previously been in use for retail purposes for a number of years and on this basis has a lawful planning use of Use Class E. Tesco can therefore occupy the site without the need for planning permission and this application seek the advertisement consent required to facilitate this occupation only.

## **Proposed Works**

### **Advertisement Consent**

Express 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.

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.

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).

### **Planning Policy Context**

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise. In this case, the development plan includes the Camden Local Plan (2017).

Other relevant documents include the London Plan (2021) and Fitzrovia Area Action Plan (2014) and Bloomsbury Conservation Area Appraisal and Management Strategy (2011). Material considerations include the National Planning Policy Framework (NPPF) (July 2021) and relevant supplementary planning documents, such as Camden Adverts SPG (2018).

### **Camden Local Plan (2017)**

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. Furthermore, 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."*

More specifically, 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."*

#### **Camden Adverts SPG (2018)**

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."*

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."*

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)**

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."* 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)**

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."* Specifically, paragraphs 5.49 to 5.52 refer to the control of advertisements stating that *"A proliferation of signage, even of an appropriate design, could harm the character of the Conservation Area."*

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

The NPPF is an additional 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 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.'*

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'*.

### **Planning Justification**

#### ***Design and Heritage Considerations***

The application seeks consent to display a number of advertisements in relation to the building's proposed use as a Tesco Express. The available planning history evidences that advertisement consent has previously been issued (LPA ref. 2016/2967/A, 2009/0613/A and 2009/3392/A) and the site is a commercial unit in a predominantly retail high street location. On this basis the principle of displaying signage, and indeed a projecting / hanging sign as has been approved previously, is clearly acceptable.

Local planning policy restricts internal illumination in conservation areas and thus external illumination is proposed (which is generally considered acceptable in heritage settings and is notably in situ on surrounding frontages located close by). The proposed illumination is additionally limited to the proposed built-up letters and hanging sign only.

In line with the Camden Local Plan (2017), the proposed signage has been designed so that it is sensitive to the character of the area, visually unobtrusive, well designed and well located. For further details on design and heritage considerations, please refer to the heritage statement prepared by ROK Planning.

Taking the above into account and noting the fact that similar advertisements have previously been approved at the site, the proposed signage is considered acceptable in design terms.

#### ***Amenity and Public Safety***

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'*. Amenity and public safety are therefore a recognised key consideration in the context of all advertisement proposals.

The paragraphs above detail the design considerations and thus it is not considered that there will be any impact on visual amenity. In addition to this, it should be noted that the illumination proposed is of a

low level and thus it is not considered that the proposal will have any effect on light pollution or highway safety.

Additionally, the proposed signage is suitably raised above ground level in order to not be visually intrusive to passers-by, employees or visitors to the site. This will ensure that the signage remains unobtrusive and neither pedestrian, public, nor highways safety is compromised.

### **Summary and Conclusion**

The advertisements are considered acceptable in design, heritage, and amenity terms and are in line with the the Camden Local Plan (2017), other relevant local policy and the NPPF. It is therefore concluded that there are no policy grounds for objection to the application and we respectfully request that the application is granted.

### **Contents of Submission**

The following supporting documents have been submitted via the Planning Portal in support of the application:

- The relevant planning application fee;
- The completed application form;
- This covering letter prepared by ROK Panning;
- Site Location Plan (Drawing No. 01\_TOHM\_01A)
- Existing and proposed drawings prepared by Tesco Feasibility Architecture;
  - Existing Elevation (Drawing No. 03\_TOHM\_03A)
  - Existing Plan (Drawing No. 02\_TOHM\_02B)
  - Existing Site Plan (Drawing No. 02\_TOHM\_02A)
  - Proposed Elevation (Drawing 03\_TOHM\_03B)
  - Proposed Plan (Drawing No. 02\_TOHM\_02C)

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 ( ) or myself at this office. I look forward to your formal acknowledgement of the application.

Yours faithfully,



**Daniel Botten**  
Planner  
ROK Planning

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