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The logo for SMPlanning, featuring the text "SMPlanning" in a light blue, sans-serif font against a dark rectangular background.

Via Planning Portal only

22nd December 2022

Dear Sir/Madam,

APPLICATION FOR ADVERTISEMENT CONSENT FOR THE REMOVAL OF EXISTING CANOPY FASCIA SIGN AND INSTALLATION OF INTERNALLY ILLUMINATED FASCIA SIGN, PROJECTING SIGN AND AWNING

33 GOODGE STEET, LONDON, W1T 2PS

Please accept this covering letter as an accompaniment to this advertisement consent application for an internally illuminated fascia sign, awning and projecting sign to the front of 33 Goodge Street.

The site:

The application site is part of a four-storey Georgian terrace, with basement, on the southern side of Goodge Street, between the junction of Whitfield Street and Charlotte Street. The property is currently in mixed use comprising a commercial unit at basement and ground floor with residential uses above. The proposed advertisements relate to the commercial unit located at ground floor/basement.

The property is not listed but is located in Charlotte Street Conservation Area. The neighbouring building at no. 35 Goodge Street is grade II listed.

The surroundings are characterised by dense retail/commercial development at street level and predominantly residential uses on the upper floors.

The proposal:

The proposal seeks advertisement consent for internally illuminated fascia sign, a projecting sign and an awning. For full details of the proposal, please see the accompanying plans.

Legislative provision:

Regulation 3 of The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (as amended) requires that local planning authorities control the display of advertisements in

the interests of amenity and public safety, taking into account the provisions of the development plan, in so far as they are material, and any other relevant factors.

Advertisement consent should be granted unless the nature of the advertisement is harmful to amenity or public safety. These matters are considered further below.

Planning policy:

National

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. Of relevance is section 12 (achieving well-designed places). Paragraph 136 of the NPPF states "*...A separate consent process within the planning system controls the display of advertisements, which should be operated in a way 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 impacts.*"

Local

For the purposes of this application, the adopted development plan for the London Borough of Camden comprises the London Plan (2021), the Camden Local Plan (2017) and Camden Planning Guidance Documents (CPG) Adverts (2018) and Design (2021).

The below policies are considered most pertinent to the determination of the application:

London Plan (2021)

D4 – Delivering Good Design

D8 – Public Realm

Camden Local Plan (2017)

D4 - Advertisements

Planning analysis:

Impact on Amenity

Policy D4 of the Camden Local Plan 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. The Council will support advertisements that preserve the character and amenity of the area; and preserve or enhance heritage assets and conservation areas.*'

Guidance on the acceptability of advertisements is provided in the Adverts CPG which reflects the aims of Policy D4. The guidance sets out that illuminated signs will be acceptable where they are sympathetic to the building and the level of illumination is in accordance with Institute of Lighting Engineers (PLG05) 'The Brightness of Illuminated Advertisements' (which would be 600cd/m² in this location). Banner signs will be considered acceptable in some commercial areas where they safeguard the amenity, character and appearance of the area.

The Design CPG provides further guidance on advertisements requiring signs to be sympathetically designed and relate well to the building. It states that projecting signs should be level with the fascia and awnings should be retractable, of traditional canvas, have the blind box integrated into the design, be attached between the shopfront and fascia, of a width appropriate to the shop front and be flush with the fascia level.

The application building is identified as making a positive contribution to the character of the conservation area, but the shop front is not identified as a shop front of merit. The application site is located on a street which is characterised by active commercial frontages, at ground floor level, with associated shop fronts and signage. Several types of advertisements including illuminated fascia and projecting signs, retractable awnings and painted façades are prevalent in the locality (figure 1).



Figure 1: Google Street View Image (December 2021) looking east along Goodge Street from the junction with Whitfield Street.

The fascia sign replaces an existing fascia sign/ fixed canopy that projects forward from the shop frontage (figure 2). The pre-existing canopy signage was incongruous in its context.



Figure 2: Google Street View Image (2014) of the pre-existing frontage (left) and Photograph of existing frontage.

The proposed fascia sign is proportionate to the scale of the shopfront. The lettering is modest and in keeping with that found elsewhere on the street. The projecting sign is modest in size, simple in design and is broadly in line with the fascia. The awning is discreetly located between the fascias and the shopfront, and its housing is in line with the fascia above. The signage respects the character and appearance of the building and the surrounding area.

Only the lettering is to be internally illuminated on the fascia and projecting sign. Both signs are restricted to an appropriate level of illumination (600cd/m²). The site is in a commercial location whereby illumination of advertisements is prevalent and therefore the proposed internally illuminated signage would not have a negative impact on the character and appearance of the area or neighbouring occupiers.

For the reasons outlined above the proposed works will have an acceptable impact on amenity of the area and neighbours and complies with Policy D4 of the Camden Local Plan.

Public safety

Policy D4 of the Camden Local Plan states that the Council will resist advertisements that impact upon public safety.

As set out above, the proposed signage is considered sensitively designed and appropriate in relation to the character and appearance of the building and the existing advertisements that exist within the surrounding area. The proposed advertisements are not considered to pose any public safety issue and do not present a distraction to highway users that endangers safety.

No grounds exist that would warrant a refusal of the application on public safety matters. The proposal is in line with Local Plan Policy D4.

Summary & Conclusion:

As set out in this letter, the advertisements are well designed and in keeping with the character and appearance of the building and surrounding area, such that they do not harm amenity or public safety. There is no conflict with the adopted development plan policies most relevant to the determination of the application. It is therefore respectfully requested that advertisement consent is granted.

I trust the commentary above is clear but if you require any points of clarification or have any questions, please do not hesitate to contact me.

Yours faithfully

Stuart Minty
Director
SM Planning