

PLANNING PRE-APPLICATION SUMMARY REPORT



Application number 24/00085/MOR

Applicant's address 4-6 Royal Parade

Plymouth

PL1 1DS

Proposal

Pre-application for vinyl graphics installed internally, LED backlit illuminated signage 50mm thick above door space and Fascia board trays

Date of Response: 01.03.2024

Dear Mr Wood,

Thank you for your pre-application enquiry for 4 – 6 Royal Parade.

Summary of key elements to the proposal

The proposal is for the installation of vinyl graphics to the shopfront, an LED illuminated sign and fascia board trays.

Illustrative plans have been submitted as part of the pre-application. The vinyl is proposed to fully cover the three shop windows at the site and would vary in their design, the vinyl would be white or frosted and blue reverse cut vinyl applied to the inside of the windows. 4no. fascia trays measuring 2940mm (w) x 1200mm (h) x 50mm (d) would be installed above the windows, which are proposed to be navy blue. The illuminated signage would be fixed to the face of the tray sign above the door. This would measure 2800mm (w) x 780mm (h) x 100mm (d) and would be made of aluminium and acrylic.

The site is within the City Centre Conservation Area and is located within the Primary Shopping Area of Plymouth City Centre.

Relevant policies

The proposal has been assessed against the Plymouth and South West Devon Joint Local Plan (2019) and the National Planning Policy Framework.

The relevant Joint Local Plan policies are as follows:

DEV1 (Protecting health and amenity), DEV20 (Place shaping and the quality of the built environment), DEV21 (Development affecting the historic environment) and DEV29 (Specific provisions relating to transport).

Additionally, the proposal has been assessed against the policies contained in the Plymouth and South West Devon Supplementary Planning Document (2020).

Site Planning History

78/02199/FUL – Change of use of ground and 1st floor from shop to restaurant (Granted Conditionally)

94/00025/ADV – Internally illuminated fascia sign (Granted Conditionally)

97/00720/ADV – Externally illuminated fascia sign (Granted Conditionally)

98/00426/ADV – Externally illuminated fascia sign (Granted Conditionally)

05/00972/FUL – Alterations, including recladding of fascia panel (Granted Conditionally)

05/00973/ADV – Illuminated fascia signs (Granted Conditionally)

24/00191/FUL – Change of use from retail (Class E) to Amusement Arcade (Sui Generis)

Consultee comments

Local Highway Authority – No objections from the LHA

Historic Environment – No comments regarding the proposed advertising and signage

Urban Design – Verbal comments raising concerns over the lack of active frontage proposed, and general guidance on the favoured design of signage.

Summary of issues and officer views

Design and Visual Impact

The PPG advises that amenity is not defined exhaustively in the Town and Country Planning (Control of Advertisements) Regulations 2007:

"It includes aural and visual amenity (regulation 2(1)) and factors relevant to amenity include the general characteristics of the locality, including the presence of any feature of historic, architectural, cultural or similar interest (regulation 3(2)(a)). It is, however, a matter of interpretation by the local planning authority (and the Secretary of State) as it applies in any particular case. In practice, "amenity" is usually understood to mean the effect on visual and aural amenity in the immediate neighbourhood of an advertisement or site for the display of advertisements, where residents or passers-by will be aware of the advertisement."

Paragraph 141 of the NPPF states:

"The quality and character of places can suffer when advertisements are poorly sited and designed. 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."

Policy DEV20.2 of the Joint Local Plan further states that proposals should:

"have proper regard to the pattern of local development and the wider development context and surroundings in terms of style, local distinctiveness, siting, layout, orientation, visual impact, views, scale, massing, height, density, materials, detailing, historic value and character."

4-6 Royal Parade is located in a prominent city centre location with a high footfall, where surrounding units are in a variety of commercial uses. Given the commercial nature of the surrounding area, it is noted that a range of designs of advertisements are common along Royal Parade. However, officers consider that no full-coverage opaque vinyls have been granted consent. Taking this into account, officers are concerned that the proposed scheme would be an incongruous addition to the well-established and highly visible streetscene.

Vinyl

Guidance in the SPD states that developments should have active frontages, particularly at ground floor level. Officers have assessed the proposed vinyl and consider that they would not provide an active frontage due to the opaque design making up most of the proposed vinyl. In order to be found acceptable by the Local Planning Authority, no more than 30% of the shopfront should be obscured by opaque vinyl. This is particularly important considering the prominence of the site, within a busy part of the city centre. It is acknowledged that the proposed vinyl is likely to create a darker environment inside the unit, to support the arcade use. However, the Urban Design Team recommend that consideration of the internal arrangement to create an adequately dark space would be more acceptable from a visual impact perspective.

Officers therefore find the vinyl currently proposed to be incongruous with the surrounding area, and unable to provide adequate active frontage, as such it is considered contrary to policies protecting visual amenity.

Illuminated signage and fascia signs

Officers raise no significant concerns with the proposed fascia signs, as they are considered to be appropriately located within the context of the shopfront, and are in proportion to the shopfront within which they sit.

Officers consider that there are limited examples of illuminated signage in the neighbouring units. No details have been provided on the level of illumination proposed, and as such officers recommend that these levels are in-keeping with units within the locality, and would not be so bright as to lead to harmful amenity impacts.

It is noted that the signage is proposed to make use of "high-quality materials", with details confirming the use of aluminium and acrylic, however no further details have been received at this stage. Consultation with urban design agree that signage should be constructed of high-quality materials, and support the use of aluminium. They also raise that signage with 3D cut lettering would be preferable to flat printed signage, particularly due to the prominent location.

Impact on the historic environment

The site is situated within the City Centre Conservation Area. The Council's Historic Environment Officer has been consulted on the application, and has raised no comments at this stage.

Officers refer to the City Centre Conservation Area Action Plan (CAAMP) which outlines the following regarding display windows:

“Large areas of glazing is an important feature of shopfronts of this period, so goods and displays can attract attention from outside. Therefore:
[...] windows will be unincumbered by excessive advertising and signage, such as posters, and will not be boarded up”.

It is further noted within the CAAMP that signage should not be internally illuminated.

As such, officers consider that currently, the scheme would not comply with DEV21 of the JLP.

Highways Considerations

The Local Highways Authority (LHA) were consulted on the pre-application and raise no in-principle objections to the scheme.

It is considered that whilst signage would be visible from the public highway, that it would be set back sufficiently so as to limit any potential impact on highway safety.

It is likely that were an application to be submitted, that it would be found acceptable on highways grounds.

Clarification of validation requirements

If an application for advert consent were to come forward, the following would be required:

- An advertisement consent application form and fee. The current fee for this type of application is £165
- A Site Location Plan showing the boundary of the property outlined in red at a standard metric scale (typically 1:1250 or 1:2500) with a north point and at least one named road. Any other land in the same ownership should be outlined in blue. Site Location Plans must have an Ordnance Survey copyright notice and license number.
- Existing and proposed plans and elevation drawings at a metric scale such as 1:100 or 1:50. Plans must show the size of the advertisement and its position on the land or building in question, show how you propose to either attach the advertisement to the building or how it will stand within the site, indicate the materials and colours to be used, show the height above ground, where it would project from the building, the extent of projection and provide details of the method and colour(s) of illumination, if applicable. Photographs and photomontages will also be required.
- Heritage Statement - The scope and degree of detail necessary in a Heritage Statement will vary according to each application, but it is expected that an acceptable Heritage Statement will contain sufficient detail to understand the history, character and significance of the building, site or area concerned (the ‘heritage asset’); describe the extent and nature of the proposed development; the impact of that development on the heritage asset; the justification for the works, and any mitigation proposed. As a minimum, applicants will be expected to have consulted the Plymouth Historic Environment Record and other sources of relevant information, and used appropriate expertise where necessary.

Any application would need to be accompanied by the following documentation. Full details of the requirements of each aspect can be found on the Council’s Local Validation List online at:

<https://www.plymouth.gov.uk/sites/default/files/2023-11/Validation-list-nov-2023.pdf>

Conclusion including likely support for proposal

Overall, as currently proposed the scheme is unlikely to be acceptable in terms of its visual impact and impact on the historic environment and would be unlikely to comply with DEV20 and DEV21 of the JLP and the NPPF.

Officers advise that a significant reduction in the vinyl, and the inclusion of non-illuminated signage would be likely to be supported by the Local Planning Authority.

PLEASE READ THESE NOTES CAREFULLY

Any advice given by council officers following pre-application enquiries does not constitute a formal response or decision of the council in respect of any future planning applications.

Any views or opinions expressed are given in good faith, and to the best of ability, based on existing planning policies and standards, without prejudice to the formal consideration of any future planning application. The final decision on any application that you may then make can only be taken after the Council has consulted local people, statutory consultees and other interested parties. The final decision on an application will then be made by senior planning officers or by the Council's planning committee and will be based on all of the information available at the time.

It follows that officers cannot give any guarantees about the final formal decision that will be made on any future planning application. However, any pre-application advice that has been provided will be carefully considered in reaching a decision or recommendation on an application, subject to the proviso that circumstances and information may change, and so alter that position. (The weight given to pre-application advice notes will inevitably decline over time and little or no weight may be given to the Council's pre-application advice for schemes which are submitted more than two years after the advice being issued.)

Any advice given in relation to planning history of the site, planning constraints or statutory designations does not constitute a formal response under the provisions of the Local Land Charges Act 1975.

Pre-application requests for advice are made public and documents will normally be released if we receive a freedom of information request or environmental information request and our file notes will form part of the public file if an application follows. We cannot therefore guarantee confidentiality. If the information you provide includes commercially sensitive or confidential information this should be clearly stated at the head of the submission. We can then take this into account should an FOI/EIR request be received.

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