

RESPONSE

ADVERTISEMENT CONSENT

OVERVIEW

The design and location of the proposed adverts do not pose any risk to public or highway safety; and are not considered to be visually obtrusive, over-dominant or detrimental to the visual amenity of the wider area. For this reason there is no adverse impact on public or highway safety or amenity; and consent should be granted.

ADVERTISING STRATEGY

The Comet Hotel has recently been refurbished to a high standard and provides a host of services. Whilst predominantly a Hotel, services also include a restaurant and bar, which serves hotel guests and also the wider public.

The purpose of the application is to support the viability of the building and its variety of services. This is considered to be of paramount importance to continuing and improving trade. The adverts have been strategically located in locations on the building to ensure reasonable visibility.

The proposed location of the signage on the curved elements of the building serve as the outermost points of the building on those locations. They also serve to provide a circumferential position, which further adds to their effectiveness. This convex shape ensures that a single sign is not on a flat plane, and can be viewed from multiple angles and not be obscured (see image to right).

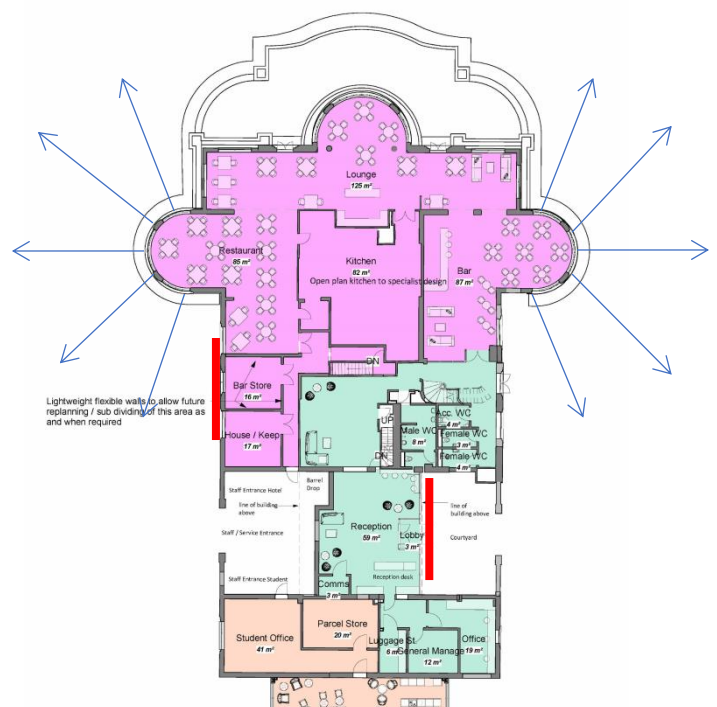


Image 1 - Advertising Strategy

The purpose of the already approved adverts (red lines - Image 1) is to direct clients to the relevant parts of the building. The signage within the private courtyard is to direct guests to the hotel foyer. The advert on the opposite side is to direct those wishing to use the restaurant and bar. Unfortunately from particular angles these signs are blocked from view (see images below).

The building is not an obvious modern hotel and as is demonstrated (below), at certain points the buildings use as a hotel is not 100% clear from particular aspects. For this reason the insertion of the proposed adverts will ensure the public awareness and in turn lead to a higher footfall of potential customers.

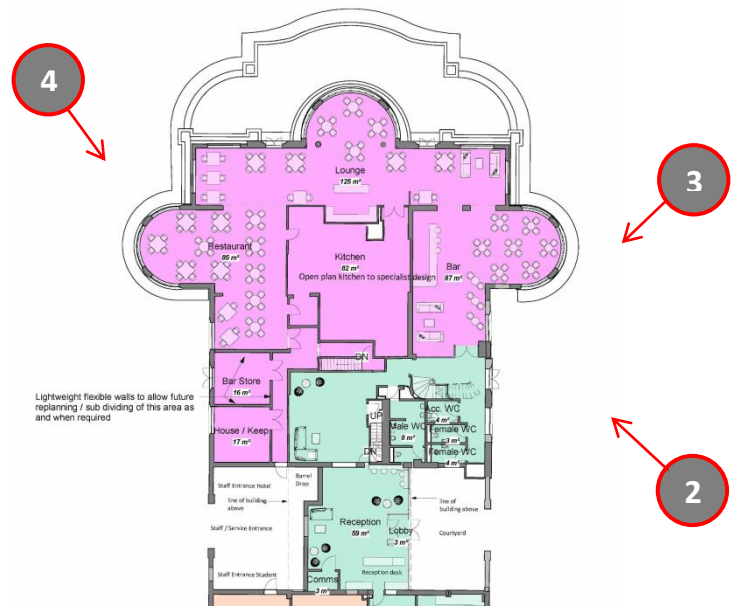


Image 4



Image 3



Image 2

LISTED BUILDING CONSENT

CONSERVATION OFFICER COMMENTS

*The application is for the installation of 2x Illuminated signage (2 no. locations)
The Comet Hotel is a grade II listed building (list entry no: 1101036). Designed by E. B. Musman, it was constructed in 1933 and is characteristic of the Art Deco style. In plan it was intended to reference the shape of an aeroplane; the two rounded side projections depicting the wings.*

Consent has previously been granted for the installation of signage (6/2019/0957/LB) on the front curved wall (north-east) and above the main doors on both the north-west and south-east elevations. The proposal was revised due to concerns over the prominence of the originally proposed signage on the north-west elevation. The signage was relocated from the parapet down to the first floor above the doorway.

It is now proposed to install signage on the rounded ends of the “wing” projections. Historic photographs show that originally there was no signage in these locations. The streamlined appearance, simple details and sharp lines of the building are fundamental aspects of its style and character. The installation of further signage is considered to clutter the elevations and detract from its architectural interest.

The proposed signage is considered to harm the significance of the listed building and an objection is raised. The harm is ‘less than substantial’ as per paragraph 196 of the NPPF. Regard should also be given to paragraph 193 which affords ‘great weight’ to the conservation of heritage assets.

HISTORIC SIGNAGE

Signage has been a key feature of the buildings history and if it is to remain a hotel must be a key feature moving forward. From The Comet’s original and un-fettered appearance, through to its modern transition; as the images below indicate, signs have been a key feature.

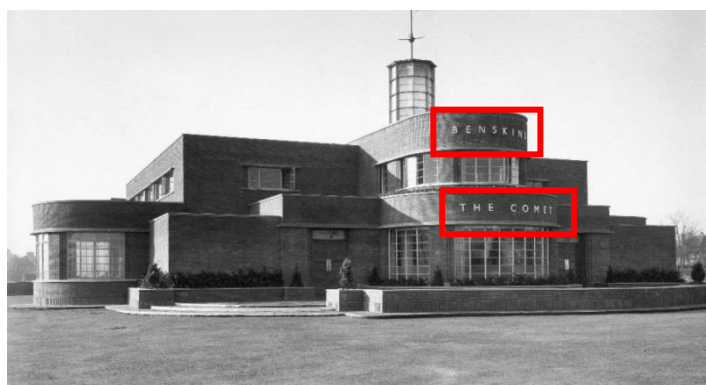


Image 5 - Original Elevation

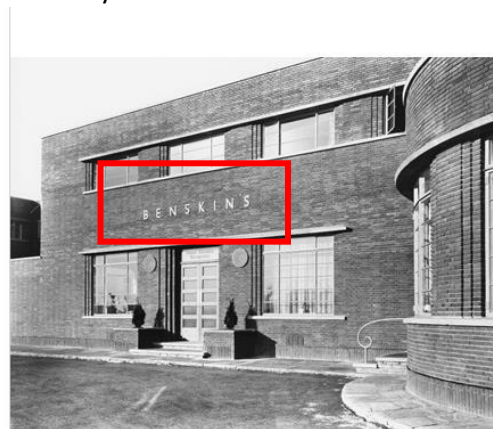


Image 6 - Side Elevation

The image above indicates that previously signage was prominent on the building, and this included signage on the first floor. It is also noted that signage was also originally installed on the side elevations of the building.

As the building was adapted and extended, the building signage uniformity changed too. The signage became larger, more pronounced and in some cases resulted in illumination on key features. Much of the additional signage was not uniform in shape, size and / or font.

In its most garish appearance the front of the building was illuminated by neon blue lighting (image below). Whilst perhaps not sympathetic to the building, it was clearly required to attract attention to the building and the services it had on offer. Assumedly, it was to try and compete, at this road junction location, with the surrounding mass development and modernisation which has dwarfed the site for a number of years



Image 7 - Existing Ramada Sign



Image 8 - Ramada Signage and Neon Light Banding

It would be fair to say that the sale of the Comet was originally due to it's dwindling business. The advertising, or the increase of advertising required over the years was due to a lack of patronage. This is an important part of the buildings history and demonstrates a number of key points:

- Advertising was key to the business of The Comet;
- Advertising signage was part of the original intention of the design; and
- Advertising is a key requirement of the building to function at its optimum viable use.

By not permitting/consenting to advertising on the building, as proposed, would put at risk the heritage asset and importantly its retention in its original and potentially most viable use.

The signs are considered (Conservation officer) to cause “less than substantial” harm. On this basis the above “public benefits” are key material considerations to be weighed in the balance.

IMPACT OF THE PROPOSED SIGNAGE

The Conservation Officer notes:

The streamlined appearance, simple details and sharp lines of the building are fundamental aspects of its style and character

Buildings Symmetry

A key feature is the buildings symmetry. From an Arial perspective the aeroplane reference (The Comet) is clearly distinct. The proposals submitted seek to ensure this symmetrical appearance is kept and emphasised. The image to the right illustrates this.

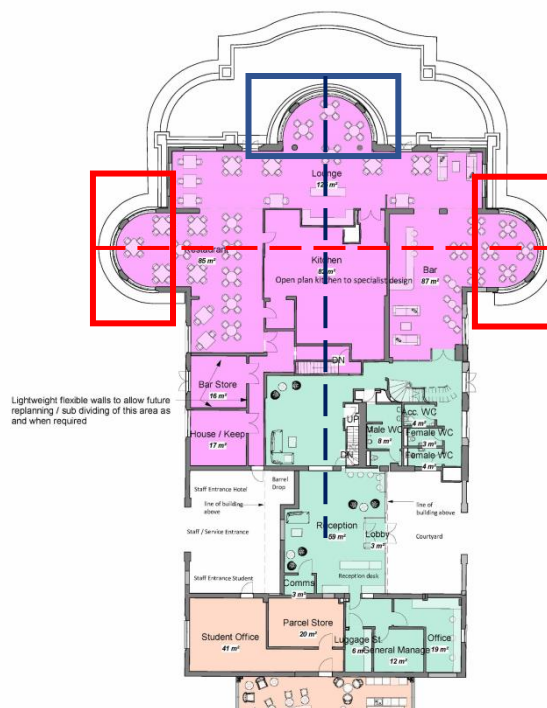


Image 9 - Illustration of Symmetry

Buildings Materials

The buildings key materials are predominantly brick. However, the insertion of thick framed white timber windows helps break up the buildings appearance along each floor’s mid rift. In light of the location of the proposed advert, above the windows of the curved elements, the signage is not considered to mask, hide or obstruct views to any key characteristics of the building. The bricks that will be partially obscured do not carry any significance themselves. For this reason no material harm is caused.

Whilst the adverts would cover a small section of the building, at different locations, the adverts would only cover a small section of the brick coursings of the building; which are numerous across the entirety of the building. They are not considered to contain any particular merit, or rarity, that contributes to the significance of the building. Notwithstanding, adverts are a long standing specific feature of the building.

Buildings Simple details and Sharp lines

Similar to the above, the character and appearance of the building is dominated by simple details (straight horizontal lines, interrupted by the vertical ends of the windows of the building). This creates a rhythm along the entirety of the building. This rhythm would not be interrupted at any point by the proposed adverts. The adverts have been strategically placed so as to work with the lines of the building; and are considered to emphasise these lines by running horizontally above the windows; emphasising the curvature of the features.

Illumination

The addition of the illuminated details would also aid in better revealing the significance of the building; particularly in the evening, when the building still continues to operate. Recent photographs demonstrate that the key features the officer notes are not visible in the evening. The addition of the soft illuminated adverts would help better reveal the buildings key features and ensure the public can better read the building in the evening.



Image 10 - current south east elevation

As previous mentioned the building itself has always, and still, seeks to continue an evening trade. This therefore has a double effect in better revealing the building but also ensuring customers are attracted to the building and its services.

Clutter

The Conservation Officer asserts that installation of further signage is considered to clutter the elevations and detract from its architectural interest. However, on the South East facing elevation (image above) it is clear that no adverts are visible and could therefore not be considered to clutter the elevation. It is noted that "The Comet Hotel" signage is attached in a recessed part of this overall elevation; in a courtyard. By virtue of its recessed nature and the courtyard the signage is not necessarily visible (as the image above indicates). We therefore consider the proposed signage would not clutter the elevation.



Image 11 - Current north west facing elevation

In relation to the North West elevation, we note that an existing advert exists. This is located to signify the main entrance to the restaurant and bar, as opposed to the opposite side of the building which is the entrance to the hotel. This signage however, in its recessed location is somewhat blocked by the curved extrusion; hence the requirement for the proposed advert. This would ensure an advert is placed in a reasonably visible location to attract and inform customers.

No signage is proposed on the first floor and the signage is proposed to be located on the reasonably visible elements; as from certain views the current advert is not visible (See image below).



Image 12 - Obscured signage

The size, scale and material appearance of the proposed advert has been selected to replicate other adverts in differing locations of the building. This ensures a uniformity and consistency that is of benefit to the building. Previous requests not to include adverts on the first floors have been adhered to.

The addition of an advert on the north west elevation is not considered to clutter or interfere with the appearance of the elevation in a way that is considered detrimental. In fact, in the context of the local area, the proposed would be a good example of not cluttering a building; unlike the Galleria (See image below).



Image 13 - Shopping Mall Opposite

As can be seen on the Galleria, building above, for instance (although not listed), a number of adverts are stacked one on top of the other. In direct contrast, the proposed works at The Comet Hotel seek to space out the adverts; whilst also ensuring reasonable visibility to attract customers.

It is therefore considered the proposed adverts do not negatively impact on the key features of the building that contribute to its character and appearance.

In addition, adverts are inherently (and actually) temporary and all physical works are easily reversible. Listed buildings must adapt and change with changing tastes and the economic market generally. Critically the building remains in its original use but this must be supported if this is to continue. The adverts proposed are a reasonable balance between heritage considerations and viability.

LESS THAN SUBSTANTIAL HARM (POLICY)

In response to the proposal of less than substantial harm we appreciate the Conservation Officers assertion. Whilst we disagree that less than substantial harm is applicable, in light of the evidence above we assert no impact at all, we respect this observation and consider the following to be of note:

Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use (NPPF para 196).

In weighing the potential harm, which is understood to relate to *“The streamlined appearance, simple details and sharp lines of the building are fundamental aspects of its style and character. The installation of further signage is considered to clutter the elevations and detract from its architectural interest”*.

We consider the public benefit of the proposals to include supporting the building and its optimum viable use. The adverts are key in ensuring that passing customers notice the building in this busy crossroads location and more importantly its function. This has been a common trait of the building throughout its history.

It is also noted, in the NPPF(para 192), that;

In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- c) the desirability of new development making a positive contribution to local character and distinctiveness.*

In short the proposed adverts aim to support the historic use of the building as a Hotel, importantly its original use. In order to do this the building must be able to advertise its use to passers-by. It is considered the proposed signage therefore enhances the asset through promoting its most viable and historic use.

The works are considered to conserve the key features that positively contribute to the significance of the heritage asset; which in turn supports more opportunity for economic viability; predominantly by attracting staying and visiting customers. The Hotel offers not only overnight accommodation,

but also a bar and restaurant for local residents. This in itself promotes vitality and more use of the asset.

Finally, the proposed development is considered to preserve the heritage asset. To a certain extent (our opinion) the illumination of the curved features, especially in the evening, when most passing trade is likely to occur, better illuminates the “streamlined appearance, simple details and sharp lines of the building”. These being key features that the Conservation Officer notes as contributing to the significance of the building.

SUMMARY

This additional response to the conservation comments confirms that the proposed advert forms part of the historical story of this building and that the proposed adverts do not harm the building. However, in light of the Conservation Officer’s judgement that this proposal causes less than substantial harm we request that the Local Planning Authority considers the public benefits associated with the proposal; as described above.