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London Borough of Camden
Planning-Development Control
Camden Town Hall
London WC1H 8ND

20th October 2023

Dear Sir/Madam

**Re: Scala 275-277 Pentonville Road N1 9NL
Replacement of existing Advertisements with fourteen LED Digital Advertisement
Displays.**

Attached is a Planning Application made on behalf of London Lites Ltd for the replacement of the existing advertisements on the Scala multi-purpose entertainment venue, with LED digital advertisements.

The Scala venue has a stage for live music, 3 bars, 2 dance floors and a snooker hall and accommodates over 1000 people. There are existing small advertisements at pedestrian level on the western frontage of Scala facing onto Kings Cross Bridge adjacent to the entrance of the Snooker Hall. The building is located on the corner of Pentonville Road and Kings Cross Bridge, adjacent to the King's Cross Thameslink station.

The surroundings are commercial in character and include offices, restaurants and retail units. Opposite the site on the western elevation is the modern glass wing of the Lighthouse office development. The site is located on the Kings Cross one way system and the A501 Pentonville Road is a well-lit main arterial road and is a very heavily trafficked part of the ring road surrounding the London Congestion Charging zone. This area is a major road and rail traffic interchange, close to King's Cross, Thameslink and St Pancras Stations. The vicinity is dominated by the road and rail network but is also a busy office and shopping area with a variety of large and small retail units.

The Scala has had three previous express consents granted for the display of advertisements with the references 2014/5584/A, 2014/7588/A and 2015/2179/A. These consents relate to the display of a substantially larger banner advertisement measuring 10 metres wide by 6.4 metres wide. These consents may indicate that the display of advertisements on this building, may be acceptable in principle.

There are two larger digital advertisements nearby outside Kings Cross Station on two bus shelters. These advertisements were granted consent on appeal (Reference 2016/1582/A). There are other advertisement displays of various sizes associated with the commercial units and shops in the immediate area.

With reference to the attached drawings, the current proposal is to replace the existing advertisements with fourteen small advertisement displays measuring 1 metre wide by 1.5 metres high. The displays will be located in the seven arch recesses of the Scala building in place of the existing advertisements which will be removed. The new displays will be acrylic fronted, smooth and vandal proof. It is intended that these new advertisements will be used to promote both events at the Scala and commercial advertising.

The proposed replacement advertisements would also be a change in the technical method of changing the static advertisements. The existing paper/pvc advertisements will be replaced by LED digital displays. The environmental advantages of these new energy efficient digital displays, is that there is no longer a need to print, instal and dispose of paper/pvc posters. There is a subsequent reduction of vehicle miles and CO2 emissions as there will not be a need to physically change and maintain the traditional posters. These LED displays will be remotely operated; saving fuel, reducing traffic and material consumption.

The LED displays will show one or more sequential static images.

It is proposed that the luminance of the advertisements will be a maximum of 300cd/m² during the hours of darkness and 600cd/m² during the day. The advertisement screens are controlled by light sensors that vary the brightness of the displays according to the ambient light conditions. The advertisement displays will be switched off entirely between midnight and 6am in the interests of saving energy.

The screens will operate at an illumination level in accordance with the guidance prescribed by the Institute of Lighting Professionals PLG05. Technical Note 5 of these guidelines recommend a maximum luminance of 300 cd/m² during hours of darkness (dusk until dawn).

This level of luminance is a standard level for digital displays and the applicants would accept conditions imposed by the Council relating to the luminance of the advertisements.

Planning Policies and Grounds for Approval

The National Planning Policy Framework (July 2021) states in Para 136 that 'Advertisements should be subject to control only in the interests of amenity and public safety taking account of cumulative impacts'.

We outline below our submission that the proposal is considered acceptable in the interests of amenity and public safety. Pentonville Road and Kings Cross Bridge do not have an excessive amount of advertising material and these advertisements are standalone features and will not add to any existing or cumulative advertising clutter.

We submit that as this is a replacement of existing advertisements, this proposal will not materially alter this site that is currently used for advertising. We believe that this proposal is a minor acceptable modification to the advertisements; on a site that has historically been used for advertising.

Amenity

National Planning Policies and in particular Planning Practice Guidance Paragraph 079 (updated March 2014) states that an advertisement 'would be permitted in an industrial or commercial area of a major city (where there are large buildings and main highways) where the advertisement would not adversely affect the visual amenity of the neighbourhood of the site.'

We believe this proposal, in this neighbourhood, adheres to these amenity criteria as the A501 Pentonville Road is a commercial area and a well-lit arterial one-way system and the area has large buildings of a substantial scale. It is believed the size and scale of the proposed advertisements are modest and they would not be out of place set against the surrounding shopfronts and the substantial scale of the 5 storey Scala building itself. Whilst high level advertisements may not be acceptable in this location, these ground floor level advertisements will integrate with the surrounding street level commercial activity.

This lively central London location which is undergoing significant regeneration within the capital, is considered to be a suitable generally commercial and vibrant context to display such a proposal. It is believed that the advertisement displays will be a vibrant and positive feature, adding colour and interest and we believe that this proposal will not be out of place with the existing commercial activity surrounding the site.

It is suggested that this is the type of busy arterial road where well-placed advertisements may be acceptable in the interests of amenity.

Highway Safety

Planning Practice Guidance (updated March 2014) Paragraph 067 states that 'There are less likely to be road safety problems if the advertisement is on a site within a commercial or industrial locality'. We believe this site on a major road corridor in a commercial locality, conforms to these criteria and it is submitted that the advertisements do not present a highway safety issue.

The small advertisements at pavement level, are designed to be visible mainly to pedestrians walking in the Kings Cross Area rather than drivers. However, for drivers, the proposed advertisements would not obscure or conflict with any other road signs or signals. The advertisements will be parallel to the traffic flow approaching from the north on Caledonian Road and Kings Cross Bridge and due to their size will not be readily visible or readable. They are also not readily visible to drivers on Pentonville Road. However, if drivers did view the advertisements, the road is busy, traffic speeds are low and the traffic conditions would allow adequate time for drivers to take in the advertisement content without causing confusion.

This type of digital advertising display is a common feature in Central London especially on Bus Shelters and street furniture and it is believed that it does not present a road safety hazard.

Transport for London Guidance for Digital Roadside Advertising published 4 March 2013 (see document 008 of this application) in para 4, Best Practice for Assessment, states that 'static digital advertising is likely to be acceptable in locations where, static advertising exists'.

With regard to both amenity and highway safety the images displayed on the proposed advertisements will be static, with no animated, moving, flashing or video elements. The advertisements and images on the displays will not change more than once every ten seconds and any changes of the image will take place instantaneously, over a maximum period of one second. The LED panels have a safety feature that will turn off the screen, to black, if the display has an error or malfunction.

Conservation Area

The Scala is not a listed building, but it is located within the Kings Cross Conservation Area, near to the boundary of the Conservation Area. However, we believe the Conservation Area should not preclude the display of advertisements altogether. Indeed, the larger digital advertisements outside Kings Cross Station, referred to above, were granted consent in this Conservation Area.

It is suggested that this part of the Kings Cross one way system has a commercial character of its own and this site is not within the core residential streets of the Kings Cross Conservation Area. The immediate surroundings of the site are completely dominated by the road transport network of Pentonville Road, Caledonian Road and Euston Road. Whilst it is accepted that advertisements may not be appropriate on residential and smaller roads they are usually appropriately sited on large highways. The road system is a well-lit major arterial road and it is on these types of trunk routes that advertisements may be acceptable and appropriate.

There is a mix of old and new buildings in the immediate vicinity; the Scala building is old and the Lighthouse office wing opposite the site is new. The juxtaposition of old and new is an accepted part of the architectural fabric and very widespread throughout London. Modern buildings and features such as digital advertising, as well as historic buildings are what makes London a great cosmopolitan capital city.

Many conservation areas include predominantly commercial, shopping and business uses where advertising may be appropriate when care is taken so that the displays are compatible with their surroundings. In such overtly commercial settings, the public is used to seeing and expects to see a range of commercial images and these advertisements form part of the areas profile and character.

In London many old buildings have retained their original facades and architectural features on the upper floors but the ground floor street level facades have been renovated to include more modern materials and advertising signage. The ground floor Kings Cross Bridge elevation of the Scala has the entrance to the Snooker Hall and existing advertisements. This is also the case of the buildings surrounding the application site and it is the active street level use of the buildings which defines the immediate area. We believe that these LED advertisements, located at ground floor street level, below fascia level, will not be out of place in such a busy urban context. The advertisements will be at the same level as the surrounding shopfronts and shop windows.

Conclusion

In conclusion, the substantial scale of the Scala building should be sufficient to accommodate such small advertisement displays, as replacements of the existing displays. Due to the Scala's location on such a busy road and rail interchange, the applicants submit that this lively city centre area, should be suitable for advertising displays at ground floor level, without negatively impacting the amenity or heritage of the surrounding area. The proposal will replace the existing advertisements and it is intended that the advertisements will continue to promote events at the Scala as well as lifestyle brands. These proposed advertisements, are a necessary modern upgrade to the existing displays and advertisements have been part of the street scene on this site for many years.

This type of small Advertisement Display is a common feature throughout London on bus shelters and other street furniture and we hope that the London Borough of Camden will support this proposal. Should you have any queries regarding the above or attached information please do not hesitate to contact me.

Yours faithfully

Tony Reade