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29th June 2020

Planning - Development Control
Camden Council
Camden Town Hall
London
WC1H 8ND

Our Ref A01460

Dear Sir/Madam

**Town and Country Planning Act 1990
Town and Country Planning (Control of Advertisements)
(England) Regulations 2007**

Application Site Address: *London Underground Vent Shaft at Euston Road/Gower Street London NW1 2AF*
Proposed Development: *Planning Permission to Erect a Steel Outer Shell around an Existing Concrete Shaft
Advertisement Consent for a Single Illuminated Display*

Please find enclosed applications for planning permission and advertisement consent relating to the same site and development proposal, which aims to redesign the look and appearance of an existing utilitarian concrete vent shaft.

The proposal is a resubmission of an earlier larger scheme that was refused by the Council in April last year and subsequently dismissed on appeal in October.^A Since that decision the Applicant has reassessed the proposal and amended the scheme by reducing the overall scale of the development in order to address the issues raised in the appeal. The proposal is presented on behalf of our client, Transport for London (TfL), with the intention of improving what is a prominent site on Euston Circus at the northern end of Tottenham Court Road. The existing concrete structure with its roof top timber addition contribute nothing positive to either the appearance or the

^A [Appendix A](#)

JCDecaux UK Limited

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character of the area. This scheme seeks to redress this through a creative solution that will transform the look of the vent shaft and continue TfL's commitment to improving, by design, the legacy of dated infrastructure across London.

The vent shaft was built in the mid 1960's and was then, and remains, a utilitarian concrete block with the sole intention of venting the underground line below. The structure was not intended to be attractive, its appearance is wholly determined by function. The exterior is untreated concrete blocks with a single door opening on the northern facade providing access to an internal ladder. Other openings are located on the east and west elevations, which are the slatted air vents. Since it was first erected the structure has changed very little except for the additional in 2006 of an illuminated portrait advertisement affixed to the northern façade and a 2m high timber rooftop crown. It is believed that there is consensus on the relative value of the existing structure; as a piece of architecture is functional at best and possesses no aesthetic quality that makes a positive contribution to the areas character or its appearance.

In light of the previous application and the appeal discussion there is also, I believe, consensus on the following factual observations raised;

- a. The site lies within a busy urban setting that experiences high levels of pedestrian and vehicular traffic movements;*
- b. That the surrounding area is dominated by modern tall buildings that include medical, office and commercial uses and retail outlets at street level;*
- c. That there are other forms of roadside advertising including those affixed to the underpass;*
- d. The site is not located within a Conservation Area or other protected environment;*
- e. There are no Listed Buildings within close proximity to the site;*
- f. That an advertisement affixed to the west facing elevation would not have an adverse impact on driver safety;*
- g. That the existing concrete structure of the vent shaft stands as a rather austere and unattractive relic of the 1960's that visually jars with the more considered modern architecture and space that surround it; and*
- h. That the existing illuminated advertisement is a lawful display that has operated since 2006.*



This current proposal builds on the comments and issues raised in the previous application and appeal and proposes a more restrained form of development without losing sight of the primary objective of improving the look and appearance of the site.

Proposal Background

The site has been the subject of only two previous applications, both of which concerned advertising related proposals with the display integrated into an outer skin. The vent shaft structure is an essential and necessary part of the underground infrastructure, however that doesn't mean it must continue to look the same or, at best, meld into the background rather than make a positive contribution to the area. This revised proposal, as before, is a collaboration between JCDecaux and TfL with the aim of transforming this unprepossessing block into something more attractive, beautiful even, that allows the main function to operate albeit within a more aesthetically interesting architectural form.

The appeal decision dismissed the previous proposal on both amenity and safety grounds. The amenity issues were concerned with the impact of the proposed development on the local character and concluded, due to the scale of the resultant structure, it would be harmful to it; that it would overwhelm the context and dominate the view. In respect of public safety, the concern related to the impact on pedestrians, cyclists and the visually impaired due to the proposed reduction in the pavement width. The Inspector did not find that the location or type of advertisement display would be harmful to driver safety. In this regard the Inspector accepted the findings and conclusions of the Road Safety Audit.

The appeal decision notice highlighted a number of important issues which influenced the objections to the scheme and ultimately the refusal of it. This decision has led to a reappraisal of the development and it is believed that the significant amendments to the scheme addresses and overcomes those objections.

These issues are summarized and discussed in more detail below;

Structure Size

A common theme running throughout the appeal decision relates to the size of the structure and the fact that it would end up being significantly larger than the one it is intended to replace. The issue of scale is not confined to the structure itself but equally to the physical extent of the advertisement display. To provide some background to the earlier proposal it should be recognized that the scheme sought to envelop the existing vent shaft with an outer steel frame. The size and position of the frame was largely determined by the servicing and maintenance requirements of London Underground and the necessity to visually inspect the concrete structure at regular intervals.

Following the appeal decision and on further discussions on this point, a more creative solution was arrived at by utilizing a more accessible cladding system. This alternative methodology has allowed a more slimline frame close to the concrete façade which enables the resultant structure to be considerably reduced in size. For example, the extent of the advertisement has been reduced by 13.1m² with the screen height going from 7.8m to 6.2m and width from 5.1m to 4.3m. The overall height of the structure has been lowered by 1.87m, however the more substantial reduction is in the footplate from the former 50Cdm² to 30Cdm², which represents a significant reduction in scale and extent of both building and display.

These changes in the scale and extent of the development are significant and go some considerable way towards addressing the concerns over scale which led to the appeal dismissal in October last year. The reduced size of structure will in turn make sure it doesn't overwhelm the surrounding public space. The alterations to the proposal will respect the local context and character which, as mentioned earlier, is dominated by much larger buildings that are modern in the design and in the materials used in construction. The exterior of the structure will be clad in a series of perforated and solid cladding panels that are intended to replicate the material and colour palette of the background buildings. These alterations would ensure compliance with Policy D1 of the Local Plan by ensuring development respects the local context and makes a positive contribution to the street and public spaces.

Pedestrian Movements

The objection to the earlier proposal on safety grounds primarily concerned the fact that the existing footpaths and space around the vent shaft would be affected by the development. In terms of safety, it was considered that the narrowing of the footpath would restrict an already tight footpath and could thereby lead to unsafe conditions for the users. This element of the decision also applied to the considerations of Planning Permission, which alluded to the Policy aims of promoting walking and cycling in the Borough. As stated above, the scale of the proposed structure in the earlier scheme was determined in order to maintain an open, internal walkway around the entire perimeter of the vent shaft. This requirement meant that the footplate, that is the amount of ground needed to accommodate the structure, would have been 50m². The internal walkway increased the width of the structure and thereby reduced the extent of the footpath along the northern and southern façade. The narrowing of the footpath was clearly considered to be unacceptable and likely to prejudice free movement. As such the loss of the pavement was held to be contrary to the Regulations and Policy.

This issue has been effectively overcome with the change in the method of inspecting the structure of the vent shaft. Through a better design and access solution the base of the proposed structure hugs the sides of the vent shaft and results in a far smaller building that previously envisaged. Furthermore, through structural alterations to the northern and southern elevations of the vent shaft, the air is directed through vents on the north, east and south elevations, which also enables the building length to be shortened. These changes have led to the current proposal, which has a 60% reduction in the footplate and not result in any narrowing or encroachment upon the footpaths on either side.

Nature of the Development

The revised proposal retains the principal function of venting the tube station below but will also incorporate a smaller single portrait advertisement affixed to the western facing façade. The screen will be used to show static commercial images in addition to displaying TfL emergency or transport related public announcements. The choice of

material is considered appropriate and befitting the character and the appearance of the local area. The backdrop building comprises the University College Hospital, a substantial building with a four storey western wing and an 18 storey main tower, which dominates the surrounding area. The image below illustrates the relative scale and puts lie to any claim that the proposed development, the black coloured block in the image foreground, could effectively compete for dominance.



Views of the proposed structure at street level are confined to this vantage point and the junction with Euston Road. The development will be seen across busy carriageways and against the backdrop of UCLH. The use of comparable external finishes that will match other building within the area will also have the effect of respecting the local character and appearance and ensure the building is seen as part of the local visual context. The display screen will face west and be visible to drivers exiting Euston Circus via Gower Street. From this approach the view of the structure is filtered through the canopy of trees along Gower Street. The view of the advertisement element is seen from the single approach alone, nothing of the advertisement will be visible from the north, south or east of the site. [Appendix B](#) suggests a number of conditions that could be applied to control the operation of the advertisement and ensure the form and content of the display remains static and lit to a level consistent with ILP guidance.



As can be seen in the above image, the northern face of the existing structure comprises an internally illuminated advertisement, which covers most of that façade and what is seen of the structure from the northern approach. This advertisement is one of a number of larger roadside displays seen within the immediate area, an example of this can be seen on either end of the road bridge buttress than spans the underpass. It is submitted therefore that the site is not an inappropriate location for roadside advertising, rather it is an established advertised site and one when other large formats displays have been approved without any harm to any interests of acknowledged importance. The continued use for that purpose, with the display forming part of a redesigned vent structure, will not harm either amenity or public safety interests.

The appearance of the existing structure offers the opportunity to make tangible improvements to the appearance of the local area by changing something that is tolerated but unpleasant into an attractive feature that illustrates the way redesigning a fix feature can improve the quality of the built form. This type of proposal is an example of how applying innovation and creativity can improve quality and bring forward development that is sympathy to locality and accords with Policy. In terms of Local Policy, the main policy applied to the earlier proposal and that remain valid are Policies D1, D4 and T1

Policy D1 is concerned with Design and the desire to ensure new development is of the highest possible standard and contribute to a safe and attractive environment. The aim of making the most of resources and making places look better it an important aim and one that this current proposal embodies. Through the design of the structure and the use of sympathetic materials, the development will fit into the local townscape without appearing discordant or alien. Policy D4 is aligned with the provisions of the Advertisement Regulations and PPG guidance on the display of advertisements. As with D1, this policy supports sympathetic advertising development, high quality design and appropriate materials that complement rather than detract for local character. As



discussed earlier, the location is not unfamiliar with the larger form of display, such as those on the underpass approved in 2011. Although the application site is close to the east facing display at the underpass, the two are not seen together or from the same vantage point. There can therefore be no substance to any claim of clutter, or proliferation of advertisement display, as only one advertisement will be seen from a multitude of positions at street level. The proposed advertisement will not be seen from residential premises and the content will remain static and appropriately lit, see [Appendix B](#) for suggested conditions to this effect.

As to build quality and standards, the proposal site is part of the underground infrastructure and as such all interventions are subject to the most stringent construction techniques, material tolerances and work methodology. The vent shaft connects to a vital part of London's rail network therefore the level of scrutiny and oversight to ensure safe practice is entirely assured.

As to safety, the effect on driver safety has been discussed above and in the previous proposal when it was accepted that a static display in this location would not prejudice driver safety. The rationalisation in the extent of the advertisement and scale of the building counters the objection to pedestrian safety, and conflict with Policy T1, as neither the northern nor the southern footpath would be restricted by this current proposal.

Conclusion

It is considered that the proposal is supported by National and Local policy. The location is appropriate because of the busy commercial nature of the surroundings and dynamic night time economy. The scale of the proposal is also appropriate to the context of the site in light of the number of tall buildings which provide the appropriate scale of built development within this locality.

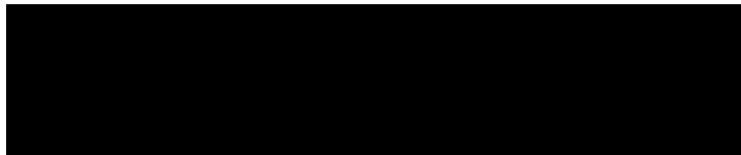
This proposal is a considered and a creative response to making improvements to an existing building and a form of development encouraged by Policy. The amendments to the proposal address the concerns raised in the earlier scheme and will transform an unattractive concrete structure with a poorly relating advertisement sign into a singularly unique and striking piece of architecture with integral display, that is in scale



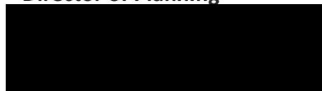
and sympathy with its surroundings. The proposed advertisement display and façade treatment will be fabricated to a high standard that would not detract from local amenity or hinder the free movement of the public.

Once you have had the opportunity to consider the application, I think it would be helpful to meet and discuss the development and the policy issues involved.

Yours faithfully



Martin Stephens BA (Hons) Dip TP MRTPI
Director of Planning





Appendix A **Appeal Decisions** APP/X5210/H/19/3227881 &
APP/X5210/H/19/3227883 Dated 9th October 2020



Appendix B Suggested Conditions

1. Any advertisement displayed, and any site used for the display of advertisements, shall be maintained in a clean and tidy condition to the reasonable satisfaction of the local planning authority.
2. Any structure or hoarding erected or used principally for the purpose of displaying advertisements shall be maintained in a safe condition.
3. Where an advertisement is required under the Regulations to be removed, the removal shall be carried out to the reasonable satisfaction of the local planning authority.
4. No advertisement is to be displayed without the permission of the owner of the site or any person with an interest in the site entitled to grant permission.
5. No advertisement shall be sited or displayed so as to obscure, or hinder the ready interpretation of, any road traffic sign, railway signal or aid to navigation by water or air, or so as otherwise to render hazardous the use of any highway, railway, waterway or aerodrome.
6. The approved screen will only be used to advertise a single product at any one time and not include any animation in the transition from one image to another.
7. The display hereby permitted shall be static, two-dimensional only, with no moving or apparently moving images, devices, wording or emblem.
8. The illumination at the site shall be a static form with a maximum luminance level of 300cdm² from dusk to 12:00 a.m. and 150cdm² between 12.00 a.m. and dawn.