

7 Hurlingham Business Park  
Sullivan Road  
London SW6 3DU  
email : tonyfreade@gmail.com  
Tel : 07774 720230

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

1<sup>st</sup> August 2024

Dear Sir/Madam

**Re: Planning Application 73-75 Clerkenwell Road London EC1R 5BU**  
**Application for a LED Digital Advertisement Display and integrated Green Wall**

Attached is a Planning Application made on behalf of London Lites Ltd for a Digital LED Advertisement Display on the western elevation of 73-75 Clerkenwell Road.

The application site is a six-storey building on the south side of Clerkenwell Road. Clerkenwell Road is a well-lit main road running from Gray's Inn Road in the west to Goswell Road in the east. The immediate vicinity of the application site is in mixed use but predominantly a commercial area with offices, shops, restaurants, hotels and a few residential properties overlooking the busy main road. The site is located within the Central Activities Zone and Clerkenwell Road falls within the administrative boundaries of both the London Borough of Camden and Islington. 73-75 Clerkenwell Road is not a listed building.

There are a number of similar advertisements in the area and numerous illuminated advertisements associated with the retail units. A nearby similar digital LED advertisement to the north of this site was granted at 96-100 Clerkenwell Road. This advertisement was granted consent in 2015 under London Borough of Islington reference 14/AP/4288 but has recently been removed. This proposed advertisement, may therefore be appropriate in this location and would not seem out of place in Clerkenwell Road.

With reference to the attached drawings, the current proposal is to erect an advertisement display measuring 3.6 metres wide by 6.37 metres high and 'green living wall' on the western elevation of 73-75 Clerkenwell Road. The proposed advertisement display will be contained within a Green Wall in order to soften and lessen the impact of the advertisement material.

The current appearance of the flank wall is untidy, covered in graffiti and it is not uniform. The wall is partly painted white, partly rendered and partly brick. The provision of the green wall will considerably improve the untidy appearance of this flank wall.

The living wall will provide aesthetic and ecological benefits to the area and in addition, the wall will contribute to air filtration, noise reduction and cooling in hot weather. A modular-cellular system using 0.5m x 0.5m pre-planted panels will be used to facilitate speed of construction of the wall and practicality for maintenance. The green wall will use predominantly native woodland plants, primarily ferns with seasonal interest added with species such as bergenias, snowdrops and anemones. Sun-loving species such as red fescue, sedum, honeysuckle and vinca will also be used. Irrigation will be provided by emitter line with electronically controlled water collection chambers. Maintenance visits will be carried out monthly to monitor and adjust the irrigation according to the season, calibrate plant feeders, provide any insect control and remove any weed growth. Pruning will be carried out according to the time of year.

The LED advertisement display will show one or more sequential static images. The environmental advantages of this new energy efficient digital display, over traditional lightbox advertisements, are that there is no longer a need to print, instal and dispose of PVC posters. There is a subsequent minimisation of vehicle miles and CO2 emissions as there will not be a need to physically change and maintain the traditional posters. This LED display will be remotely operated; saving fuel, minimising traffic and material consumption.

We believe the advertisement is of a suitable size, scale and design which is in keeping with the area and surrounding properties. This proposal will introduce an active and vibrant elevation to the building which we believe will complement the bustling nature of this part of Clerkenwell Road.

## **Illumination**

The advertisement display shows one or more sequential static images and the illumination is not at any time intermittent.

The maximum luminance will be 600cd/m<sup>2</sup> during daylight hours and 300cd/m<sup>2</sup> from dusk until dawn. This would be within the luminance levels as recommended by the Institute of Lighting Professionals guide "Technical Notes on The Brightness of Illuminated Advertisements" note 5. Technical Note 5 of these guidelines recommend a maximum luminance of 300 cd/m<sup>2</sup> during hours of darkness (dusk until dawn). Furthermore, the display will be switched off entirely between midnight and 6am in order to save energy.

The display is controlled by light sensors that vary the brightness of the display according to the ambient light conditions. Therefore, it is reasonable to assume that the luminance of the display will be below the maximum levels for considerable periods of time.

Low energy lighting is desirable and plays a part in addressing climate change. The LED light units of this display are recyclable as is the aluminium frame of the advertisement panel.

We would also accept other conditions imposed by the Council, in any consent that might be considered, relating to the luminance or frequency of change of the advertisements.

## **Planning Policies and Grounds for Approval**

The National Planning Policy Framework 2023 and 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 Clerkenwell Road is a well-lit main road, in a predominantly commercial area and with large buildings of a substantial scale. 73-75 Clerkenwell Road is a six-storey building and the buildings in the vicinity are between 4 and 6 storeys high and we submit form a substantial and sufficient backdrop for the proposed advertisement. The advertisement display will respect the host building and the advertisement will be easily contained within the building lines of 73-75 Clerkenwell Road.

The advertisement display will occupy approximately 7% of the western elevation of the building and we believe the size of the advertisement display is not excessive. This proposal and particularly the living green wall, will improve the current appearance of the flank wall and will have a positive impact on the vicinity. The advertisement will add an active and vibrant feature to 73-75 Clerkenwell Road, creating a feature in the street scene with colour and interest. We believe this feature will be in keeping with the bustling nature of Clerkenwell Road. It is suggested that this is the type of busy main road where well-placed advertisements may be acceptable in the interests of visual amenity.

The National Planning Policy Framework 2023 and Planning Practice Guidance (Revised 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 main road corridor in a predominantly commercial locality, conforms to these criteria and it is submitted that the advertisement display does not present a highway safety issue.

The proposed advertisement does not obscure or conflict with any road signs or signals and the long range of visibility gives drivers ample time to assimilate the advertisement material within their normal field of vision. Although the road is busy, traffic speeds are low. The advertisement would be visible only to traffic approaching from the west on Clerkenwell Road. It would be seen from a sufficient distance on a straight road, which, combined with 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 and it is believed that it does not present a road safety hazard.

With regard to both amenity and highway safety the images displayed on the proposed advertisement panel will be static, with no animated, moving or video elements. The advertisements and images on the display will not change more than once every ten seconds and any changes of the image will take place instantaneously. The advertisement screen has a safety feature that will turn off the screen, to black, if the display has an error or malfunction. We would accept similar conditions imposed by the Council, in any consent that might be considered.

In conclusion, we believe the proposed advertisement display and living green wall will considerably improve the current appearance of the flank wall. The proposal will be a positive, active and vibrant feature and will be seen as part of this bustling area and transport corridor and add some visual interest and vibrancy to the street scene. We submit that the scale and nature of the predominantly commercial surroundings will be able to accommodate this advertisement without detracting from the visual amenities of the area. The LED digital display will be remotely operated minimising vehicle movements, traffic, fuel consumption and carbon emissions. It complies with local and national policies and represents a substantial investment in a high-quality display. The advertisement display will support retail activity and contribute to the regeneration of the High Street. The advertisement display will be contained within the green wall and the living green wall will positively add to the amenities of the area.

We hope that the London Borough of Camden will support this application and should you have any queries regarding the above or attached information please do not hesitate to contact me.

Yours faithfully

Tony Reade