

Delegated Report		Analysis sheet		Expiry Date:	27/09/2024
		N/A		Consultation Expiry Date:	15/09/2024
Officer			Application Number(s)		
Brendan Versluys			2024/3234/A		
Application Address			Drawing Numbers		
73-75 Clerkenwell Road London EC1R 5BU			See decision notice		
PO 3/4	Area Team Signature	C&UD	Authorised Officer Signature		
Proposal(s)					
Display of a 6m height x 3.5m width wall-mounted digital billboard.					
Recommendation(s):		Refuse Advertisement Consent			
Application Type:		Advertisement Consent			
Conditions or Reasons for Refusal:		Refer to Draft Decision Notice			
Informatives:					
Site Description					
<p>The subject site relates to the western façade of a six storey building on the western side of Clerkenwell Road (at 73-75 Clerkenwell Road), and an adjoining vacant plot occupied by surface level car parking (at 75-77 Clerkenwell Road).</p> <p>The application site sits within the Hatton Garden Conservation Area. Neither of the properties accommodate listed buildings.</p>					
Relevant History					
None relevant.					
Relevant Policies					
National Planning Policy Framework 2023 The London Plan 2021					

Camden Local Plan 2017

A1 Managing the impact of development

C5 Safety and Security

C6 Access

D1 Design

D2 Heritage

D4 Advertisements

G1 Delivery and location of growth

T1 Prioritising walking, cycling and public transport

Camden Planning Guidance (CPG)

CPG Design (2021) - chapters 2 (Design excellence), 3 (Heritage) and 7 (Designing safer environments)

CPG Transport (2021) - chapters 7 (Vehicular access and crossovers) and 9 (Pedestrian and cycle movement)

CPG Advertisements (2018) – paragraphs 1.1 to 1.15; and 1.34 to 1.38 (Digital advertisements)

CPG Amenity (2021) - chapter 4 (Artificial light)

Camden Streetscape Design Manual

Digital Roadside Advertising and Proposed Best Practice (commissioned by Transport for London) March 2013

Design of an accessible and inclusive built environment. External environment - code of practice (BS8300-1:2018 and BS-2:2018)

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

Planning (Listed Buildings and Conservation Areas) Act 1990 as amended by the Enterprise and Regulatory Reform Act (ERR) 2013

Draft Camden Local Plan

The council has published a new [Draft Camden Local Plan](#) (incorporating Site Allocations) for consultation (DCLP). The DCLP is a material consideration and can be taken into account in the determination of planning applications, but has limited weight at this stage. The weight that can be given to it will increase as it progresses towards adoption (anticipated 2026).

Assessment

1. Proposal

- 1.1. Advertisement consent is sought for the installation and display of an internally illuminated LED digital advertising signs, attached to the western elevation of the building at 73-75 Clerkenwell Road.
- 1.2. The display would measure 6m in height and 3.5m in length, and be raised 3.14m from ground level. The display would be project outwards from the building on its southern side, with a slight angle to be oriented towards eastbound traffic on Clerkenwell Road.
- 1.3. The applicant proposes to implement a living wall along the remainder of the building's western elevation.
- 1.4. The Town and Country Planning (Control of Advertisements) Regulations 2007 permits the Council to only consider amenity and public safety matters in determining advertisement.

1.5. The Council's Hoarding Initiative secured the removal of a number of large scale advertisements which were considered detrimental to the amenity of the wider area. Accordingly the presence of such signs in the borough is limited. This increases demand for such large adverts but also heightens their impact given the lack of similar scaled advertisements.

2. Planning Considerations

2.1. The material considerations in the determination of this application are as follows:

- Design and Heritage
- Amenity
- Public Safety

3. Design and Heritage

3.1. Policy D4 Advertisements of the Camden Local Plan 2017 requires advertisements to respect the form, fabric, design and scale of their setting and host building and be of the highest standard of design, material and detail. The policy outlines the Council will support advertisements that preserve the character and amenity of the area, and preserve or enhance heritage assets and conservation areas. Advertisements will be resisted where they: contribute to an unsightly proliferation of signage in the area; contribute to street clutter in the public realm; cause light pollution to nearby residential properties or wildlife habitats; have flashing illuminated elements; or impact upon public safety.

3.2. CPG (Advertisements) also states that:

Advertisements and signs should respect the form, fabric, design and scale of the host building and setting. All signs should serve as an integral part of the immediate surroundings and be constructed of materials that are sympathetic to the host building and the surrounding area.

Advertisements in conservation areas and on or near listed buildings require detailed consideration given the sensitivity and historic nature of these areas or buildings. Any advertisements, of whatever type, on or near a listed building or in a conservation area must not harm their character and appearance and must not obscure or damage specific architectural features of buildings.

Digital advertisements are by design visual prominent and attention grabbing with their illuminated images, especially when they are large in size. They are not suitable for locating in some areas. Factors which make a location less suitable for digital billboards include locations:

Within conservation areas;

- Within predominantly residential areas;
- With a uniform heritage character,
- near listed buildings; and
- where the advertisement could become the most prominent feature of the street scene

3.3. It states that "All advertisements affect the appearance of the building, structure or place where they are displayed, and can at times can be a dominant feature in their setting. Furthermore "Advertisements and signs should respect the form, fabric, design and scale of the host building and setting. All signs should serve as an integral part of the immediate surroundings and be constructed of materials that are sympathetic to the host building and the surrounding area. Advertisements above fascia level can appear visually obtrusive and unattractive.

Assessment of Proposals

4. Design and heritage

- 4.1. Section 12 (Achieving well-designed places) of the National Planning Policy Framework (NPPF) states in Paragraph 136 that 'The quality and character of places can suffer when advertisements are poorly sited and designed'.
- 4.2. Local Plan Policy D4 (Advertisements) confirms that the "Council will resist advertisements where they contribute to or constitute clutter or an unsightly proliferation of signage in the area." (Paragraph 7.82).
- 4.3. Camden Planning Guidance (CPG) Design advises that good quality advertisements should respect the architectural features of the host building and the character and appearance of the surrounding area. CPG Amenity advises that artificial lighting can cause light spillage and glare, as well as, be damaging to the environment through having a detrimental impact on the quality of life of neighbouring residents and by changing the character of a locality.
- 4.4. The screen would be affixed to and protrude from the edge of the western face of the building, with a slight angle to be oriented towards eastbound traffic on Clerkenwell Road. Given the scale of the advertisement and that the screen would not be flush with the building, in this context it would add solidity to the structure containing the screen and add a visually discordant amount of bulk to this part of the building.
- 4.5. While the western façade of the building itself is in poor condition, the digital screen and its physical structure would be seen in views with the front façade of the building, which has a high level of architectural merit and is a positive contributor to the conservation area. The provision of the green living wall would not mitigate the harm caused by the digital screen. This part of the building's western façade could be repaired / remediated without the addition of a large digital advertising screen and living wall. Further, planning permission has not been sought for the green wall so it cannot be secured as part of the advertisement consent. As such, the green wall is not given any weight in terms of any benefits/mitigation it could bring about.
- 4.6. The screen would appear overly prominent in this context and cause harm to the character and appearance of the host building and wider conservation area.
- 4.7. The structure of the digital screen itself, in particular the metal surrounds, is unsightly and unsympathetic to the character and appearance of the host, character contributing, building.
- 4.8. The screen would appear as overly large and out of proportion with the streetscape, within a conservation area and would be highly visually prominent in views along Clerkenwell Road. The advert would appear discordant with the streetscape in this context and add harmful clutter. Being positioned within the public realm in combination with the size and scale of the screen, means the screens would appear as excessive in scale and size to passing eastbound traffic on Clerkenwell Road.

5. Amenity

- 5.1. Given that the proposed display area for the screen would measure approximately 23 sqm, the proposal would introduce a significant amount of high level illumination within the locality, resulting in a dominant and harmful addition to the area. In this regard, CPG Advertisements recognises in Paragraph 1.38 that digital advertisements are 'by design visual prominent and attention grabbing with their illuminated images, especially when they are large in size. They are not suitable for locating in some areas.' Factors which make a location less suitable for

digital billboards include locations 'where the advertisement could become the most prominent feature of the street scene.'

5.2. In this context, and given the large size, position above fascia level and illumination of the sign, the proposal would be highly visible in both local and longer views, appearing incongruous and unduly dominant, as well as, being out of character with the locality which is generally absent of large illuminated signage of any kind. Smaller digital or illuminated advertising signs are noted as being more appropriately displayed at fascia or street level.

6. Siting

6.1. Policy T1 (Prioritising walking, cycling and public transport) states that '*In order to promote walking in the borough and improve the pedestrian environment, we will seek to ensure that developments improve the pedestrian environment, are easy and safe to walk through ('permeable'), provide high quality footpaths and pavements that are wide enough for the number of people expected to use them. Features should also be included to assist vulnerable road users where appropriate.*'

6.2. The policy further states that '*In order to promote cycling in the borough and ensure a safe and accessible environment for cyclists, the Council will seek to ensure that development is easy and safe to cycle through ('permeable').*'

6.3. As the screens would be attached to the building and raised above street level, the screens would not have any discernible effect on pedestrian movements and flow on Clerkenwell Road.

7. Public Safety

7.1. Policy D4 (Advertisements) states that '*Advertisements will not be considered acceptable where they impact upon public safety, including when they:*

- *obstruct or impair sight lines to road users at junctions and corners;*
- *reduce the effectiveness of a traffic sign or signal;*
- *result in glare and dazzle or distract road users;*
- *distract road users because of their unusual nature;*
- *disrupt the free flow of pedestrian movement; or*
- *endanger pedestrians forcing them to step on to the road.'*

7.2. The site is located on Clerkenwell Road (A5201) which forms part of the strategic road network. Clerkenwell Road is also one of the busiest cycle route, with bicycles accounting for more than 50 per cent of the westbound traffic in the morning peak period. Proposals for a Safe and Healthy Streets Scheme for the Clerkenwell Road area were approved by the Cabinet Member for Planning and a Sustainable Camden on 17th July 2024. The proposals include the implementation of permanent Safe and Healthy Streets changes in the Clerkenwell Road area, in the Holborn and Covent Garden Ward, particularly the section of Clerkenwell Road between the junction with Saffron Hill, and up to and including the junctions of Theobalds Road / Gray's Inn Road / Clerkenwell Road / Rosebery Avenue. These changes include cycling, walking, bus, greening and public space improvements, as well as changes to parking and loading in the area. One of the key features of the scheme is the introduction of stepped cycle tracks on both sides of the road, including at the site where the wall-mounted digital billboard is being proposed.

7.3. The proposed digital billboard would be mounted on the west facing wall of the host building, and would be approximately 10 metres from a set of traffic signals at the junction of Clerkenwell Road, Herbal Hill and Saffron Hill. The digital billboard, due to its size and proposed location near a set of traffic signals, would have the potential to be highly distracting

to cyclists and motor vehicle drivers travelling in the eastbound direction at a point where they need to be concentrating on the road ahead approaching the traffic signals. This could lead to dangerous situations with cyclists and pedestrians in particular but including other road users being placed at risk of collisions due to distraction.

7.4. The proposal would therefore be contrary to Local Plan policies A1 (Managing the impact of development), D1 (Design), and D4 (Advertisements), and result in unacceptable road safety outcomes.

8. Conclusion and Recommendations

8.1. The proposed advertisement, by virtue of its size, siting, prominent location on the building and method of illumination, would add prominent visual clutter and appear as an incongruous and unduly dominant addition, which would have a harmful effect on the visual amenity of the host building, street scene, the wider Hatton Garden Conservation Area, contrary to Policies D1 (Design), D2 (Heritage) and D4 (Advertisements) of the Camden Local Plan 2017.

8.2. The proposed advertisement, by virtue of its size, siting, prominent location on the building and method of illumination, in combination with its proximity to a signalled controlled junction, would introduce a distraction to road traffic, causing harm to highway and public safety, contrary to Transport for London guidance, and Policies A1 (Managing the Impact of Development), D4 (Advertisements) and T1 (Prioritising walking, cycling and public transport) of the Camden Local Plan 2017.

8.3. It is recommended that advertisement consent is refused.