



**Armstrong Planning**

## **PLANNING STATEMENT**

*on behalf of*

**King Media Ltd**

*for*

**Advertisement Consent for Temporary Display of an Externally  
Illuminated Shroud Advertisement (PP – 13553448)**

*at*

**341 Euston Road, London, NW1 3AD**

**11<sup>th</sup> November 2024**



## **1. INTRODUCTION**

### **1.1 Introduction**

Armstrong Planning have been retained by the applicant, King Media Ltd, to submit this application for advertisement consent for an externally illuminated advertisement (10.6m wide x 5.5m high) set within an illustrated scaffold shroud at 341 Euston Road, London, NW1 3AD (the application site) for a temporary period of 42 weeks from 18/03/2025 to 05/01/2026.

Repair and wind & water tightening works are scheduled for the application site, with the proposed shroud and advertisement intended to cover the scaffolding throughout the duration of the work. We respectfully ask the Planning Authority to weigh up some of the public benefits of the scheme, including the following:

- Commercial revenue from the advert will help leverage private capital of the building owner to be invested in the repair, maintenance and enhancement of the host building, improving the building's contribution to the streetscape and the quality of the urban realm in the long term.
- The advert will subsidise a high-quality shroud, and the illustration of building imagery thereon, to wrap scaffolding and screen building works, which will significantly mitigate the negative visual impact of both scaffolding and building works on the surrounding street scene.
- The advertising sector is a significant generator of economic development. A grant of permission would help buoy the sector, supporting jobs and the economy.

### **1.2 The Application Site and Allocations**

The application site is located at 341 Euston Road, London, NW1 3AD and falls within the jurisdiction of London Borough of Camden. The property is a four-storey building located on a corner site. The subject property is not a Listed Building, however, it does fall within Fitzroy Square Conservation Area. The site does not fall within any Special Area of Advertisement Control. The surrounding area is busy and vibrant, and is commercial in character.

## **2. THE PROPOSAL**

Maintenance repairs and wind and water tightening works are scheduled to take place at the application site. This application is seeking advertisement consent for a static, externally illuminated shroud advertisement measuring 10.6m wide x 5.5m high, set within an illustrated scaffold shroud depicting a 1:1 facsimile of the building façade. It is proposed that the shroud and advertisement will cover the scaffolding while works are taking place, shielding the public from unsightly works. The advertisement shroud and scaffolding will be removed upon completion of the works, after a period of 42 weeks.

This illustrated shroud will consist of a high-quality material and would be maintained to a high standard, it will help mitigate the negative impact of the necessary scaffolding and building works on the visual amenity of the area. Works are due to be completed, and scaffolding is to be struck in January 2026, accordingly advertisement consent is sought for a temporary period until 05/01/2026. and will be removed thereafter. The commercial area within the shroud has been scaled respectfully in the context of the Conservation Area and amounts to just 10% of the shrouded elevation, ensuring the building will be read first and foremost, with the advertisement being a secondary and subordinate feature.

### 3. POLICY COMPLIANCE

#### **NPPF**

The National Planning Policy Framework (NPPF), revised December 2023, sets out a presumption in favour of sustainable development and promotes the positive improvement of the built environment; it encourages local planning authorities to work with applicants to foster a positive approach to planning. Paragraph 141 of the revised NPPF states that *“advertisements should be subject to control only in the interests of amenity and public safety.”*

#### **Planning Practice Guidance**

It is important to note that Section 18b-001- 20140306 of the Planning Practice Guidance (PPG) accompanying the NPPF states that the *“display of advertisements is subject to a separate consent process within the planning system... Advertisements are controlled with reference to their effect on amenity or public safety only, so the regime is a lighter touch than the system for obtaining planning permission for development.”*

Paragraph 18b-005 of the Planning Practice Guidance accompanying the NPPF specifically relates to shroud and banner advertisements and states that *“buildings which are being renovated or undergoing major structural work and which have scaffolding or netting around them may be considered suitable as temporary sites for shroud advertisements or large ‘wrap’ advertisements covering the face, or part of the face, of the building.”*

#### **Local Plan**

Policy D4 of the Camden Local Plan 2017 relates to ‘Advertisements’ and states that the Council shall support advertisements that:

- *“Preserve the character and amenity of the area;*
- *Preserve or enhance heritage assets and conservation areas.”*

– The proposed shroud and advertisement will cover the scaffolding while works are taking place, shielding the public from unsightly works.

It goes on to state that the Council will resist advertisements that:

- contribute to an unsightly proliferation of signage in the area; – Based on the streetscape, it seems there are no other advertisements in the area. Since the proposed advertisement is temporary, it should not be seen as contributing to proliferation of signage or advertising
- contribute to street clutter in the public realm; – The proposed advertisement features a sleek design, printed on a high-quality shroud framed in a 1:1 facsimile of the host building, and will be presented neatly, similar to the example shown in Fig. 5.
- cause light pollution to nearby residential properties or wildlife habitats; The light fixtures will be positioned in an angle to prevent light spill.
- have flashing illuminated elements; or No flashing lights are proposed for illumination. (See the accompanying Lighting Specifications submitted as a part of this application)
- impact upon public safety. – Discussed under Section 4 of this document.

Section 7.82 of the Local Plan concerns ‘Character and amenity’ and states that *“The size, location, materials, details and illumination of signs must be carefully considered. Interesting and unique styles*

*of advertisements and signs will be considered acceptable where they are compatible with the host buildings and surrounding environment.”*

Section 1.26 of the Camden Planning Guidance: Advertisements relates to ‘Shroud advertisements’ and states that shrouds on scaffolding (erected for the purposes of carrying out building works and removed upon completion), will only be permitted where the:

- *“scaffolding covers the entire elevation of the building and the netting on the scaffolding depicts a true 1:1 image of the completed building which is undergoing construction work;*
- *shroud does not exceed the height and length of the completed building (the 1:1 image should also not be extended where scaffolding stretches around a corner); and the*
- *advertisement on the shroud covers no more than 20% of the shroud on each elevation and is not fragmented. The advertisement must also respect the architectural form and scale of the host building. Where shroud and banner advertisements are considered acceptable on listed buildings or in conservation areas, the advertisement on the shroud should not cover more than 10% of the shroud on each elevation and is not fragmented. The location of the advertisement on the shroud will depend on the character of the local built form and the nature of views within it.”*

The proposed commercial advert is located at the bullnose between the Euston Road and Fitzroy Street. The commercial area within the shroud amounts to 10% of the overall shroud.

### **Visual Amenity**

In terms of visual amenity, this shroud will shield public view from unsightly building works and scaffolding while works are taking place, helping mitigate the negative impact of the necessary scaffolding and building works on the visual amenity of the area. The proposed commercial display is framed within a 1:1 facsimile of the building facade, this will ensure that the host building will be read first and foremost with the advert appearing as a secondary and subordinate feature. The effect of which is that the sense of the building in its streetscape will be retained.

The application site is commercial in character. We submit that a commercial display (of the size proposed in relation to the host building) is appropriate in the context of the vibrant and commercial character of the area. The proposed advertisement will only be in situ during the phase of works and will be removed thereafter. There will be no physical impact on the host building, any impact will be purely visual and temporary, it will not impact materially on the significance of any heritage asset. The positive benefits to the host building will be long lasting.

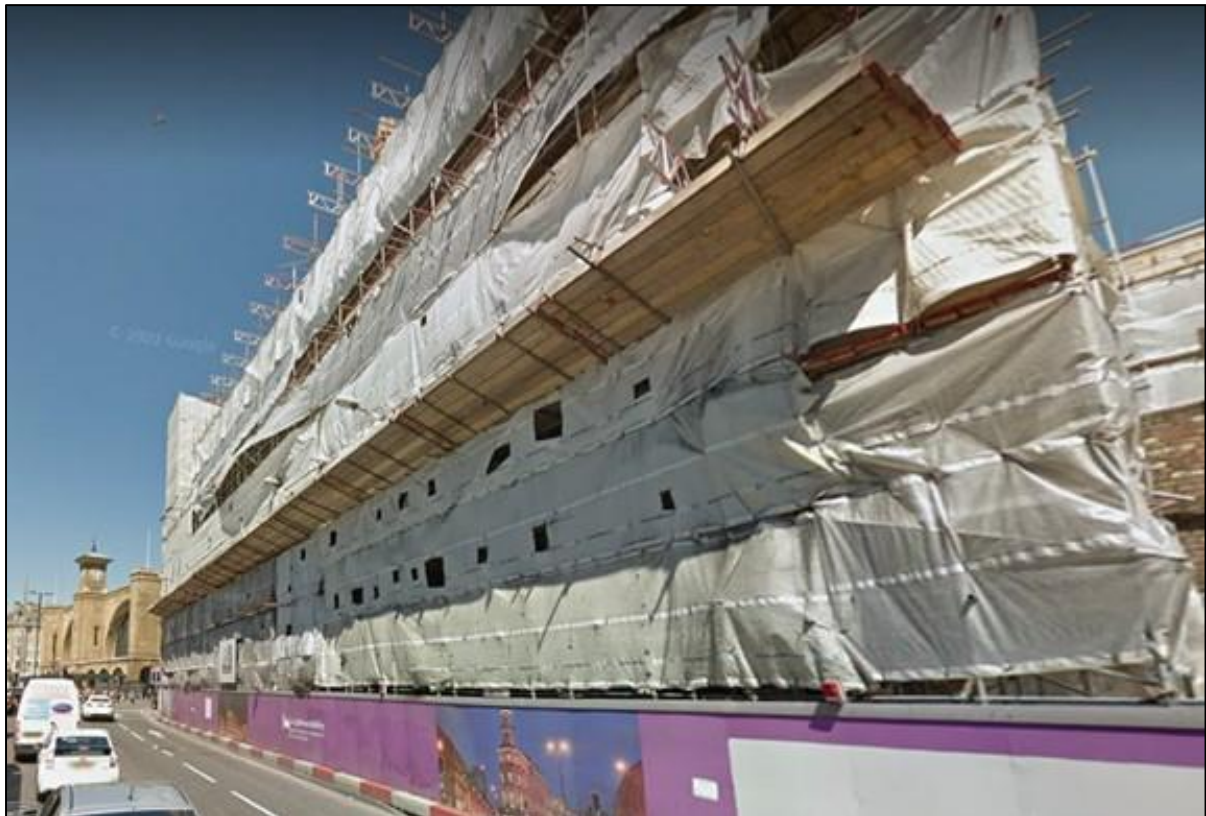
The commercial display relies upon the advertisement being sold, typically accounting for only 50% of the permitted display period. When the space is unsold, the full 1:1 building imagery will be visible.

The proposal seeks to attract a commercial advertiser during the phase of works only and will improve the visual appearance of the building while scaffolding is necessary. The images below show negative visual impact of scaffolding and generic sheeting.

Fig 1: Example of negative visual impact of scaffolding on the street scene at 1 Great Portland St



Fig 2: Example of negative visual impact of scaffolding on the street scene at 370 Gray's Inn Rd





The building owner has partnered with applicant, King Media Ltd (trading as Maximus), who have a proven record in assisting landowners in upgrading their properties by subsidising refurbishment and redevelopment projects. Please see the brochure 'Enhancing the Urban Landscape' which is submitted as part of this application and showcases some examples of how Maximus's commercially sponsored illustrated shrouds have delivered real benefits to the public realm. This positive impact on visual amenity is long lasting and should be considered in addition to temporary benefits of screening unsightly scaffolding and building works. The images below are examples of smartly screened building sites at London.

*Fig 3: Example of the aesthetic benefit afforded by a scaffold shroud.*



Fig 4: Example of the aesthetic benefit afforded by a scaffold shroud.



#### 4. Public Safety

In terms of highway safety, Section 7 of the Planning Practice Guidance accompanying the NPPF concerns considerations affecting public safety. Section 18b-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, if it is a shop fascia sign, name-board, trade or business sign, or a normal poster panel, and if the advertisement is not on the skyline”*. The proposed advertisement fully meets these criteria being a normal poster panel in a commercial area and not protruding into the skyline.

Section 18b-068 of the Practice Guidance sets out a list of the kind of adverts that *“may cause a danger to road users”*, none of which apply to the proposed advertisement, which will not do any of the following:

- Obstruct or impair sight-lines
- Obstruct or confuse a road user’s view
- Reduce the clarity or effectiveness of any traffic sign
- Be likely to distract road users because of their unusual nature (a banner advertisement is not in and of itself an unusual feature)
- Leave insufficient clearance above any part of the highway
- Include moving or apparently moving elements
- Require close study.
- Resemble traffic signs
- Embody directional or other traffic elements





The proposed advertisement is not unusual, it is static with good range of visibility, thus it will not appear as a sudden feature or present itself as a road hazard. This type of advertisement display is designed to be readily assimilated and understood by road users and pedestrians. The size, type and position are all appropriate in the context of the commercial area. In light of the above the proposal is not considered a threat to road or public safety.

## 5. PRECEDENTS

- Planning Ref – 2024/3260/A – Permission was granted for temporary display of an advertisement (20.0m x 10.0m) at Imperial Hotel, 61-66 Russell Square, London, WC1B 5BB. This site was identified as falling within a Conservation Area.
- Planning Ref – 2024/2351/A – Permission was granted at Grays Inn Road, London, WC1X 8PX, for temporary display of a shroud advertisement. This site is identified as falling within King Cross Conservation Area.
- Planning Ref – 2024/1911/A – Permission was granted for temporary display of advertisement at 59-61 Camden High Street, London, NW1 7JL. This site was identified as falling within Camden Town Conservation Area.

## 6. CONCLUSION AND SUMMARY

Maintenance and wind & water tightening works are scheduled to take place at the application site. The proposed shroud and advertisement are intended to cover the scaffolding throughout the duration of the works. We acknowledge that the proposed shroud advertisement may exert a temporary visual impact on the street scene. However, the commercial display will be visually more appealing than the alternative generic scaffolding, grey plastic sheeting and building works that would otherwise negatively impact upon the visual amenity of the area (as can be seen in the examples provided above).

We submit that the impact of the advert on visual amenity should be considered net positive on balance. The screening benefits of this advertisement-bearing shroud (shielding unsightly building works) will mitigate the impact on visual amenity that temporary building works will incur. We submit that the proposed shroud advertisement is of an appropriate size, that is proportional to the building façade. The advertisement is framed by an illustrated shroud with a 1:1 depiction of the building imagery. A temporary shroud advertisement of this sort should be considered acceptable in a busy commercial area. The temporary nature of the shroud only being required until the works are completed needs to be taken fully into account.

Commercial sponsorship projects of this nature create an entire eco-system of economic benefit with significant knock-on effects stimulating many areas of the economy, particularly the construction and retail sectors, but also benefiting the creative industries and a range of related professionals. The chain of advertising agencies, creatives and personnel involved in the successful delivery of such an advertisement are all considered to fall within 'the creative industry'.

In addition, we would suggest that commercial adverts in the public realm are rateable assets and as such provide an opportunity to contribute to local government through collection of business rates.

I am attaching the following documents with this letter to assist determination:

- Location Plan
- Site Plan



- Existing North Elevation
- Existing West Elevation
- Existing South Elevation
- Existing View 1
- Existing View 2
- Proposed North Elevation
- Proposed West Elevation
- Proposed South Elevation
- Proposed View 1
- Proposed View 2
- Standard Specification
- Project Programme
- Schedule of Works
- Schedule of Condition
- Lighting Specification
- 'Enhancing the Urban Landscape' Maximus Brochure

We trust the planning department has sufficient information to determine this application for advertisement consent and we look forward to a decision in due course.

Prepared by,

  
**DAVID ARMSTRONG BA** MRUP MIPI MRTPI