

4 October 2013

**London Borough of Camden
Planning & Built Environment
Town Hall
Argyle Street
WC1H 8NJ**

OUR Ref A00901

Dear Sir/Madam,

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

Re: Application for Consent to Display an Advertisement

**Site: University College Hospital 235 Euston Road
London NW1 2BU**

Please find enclosed a completed application form and associated plan documents submitted on behalf of our client University College Hospital (UCH) that seeks consent for the installation of an illuminated display screen affixed to the exterior of the hospital building at the junction of Euston Road and Tottenham Court Road.

This application is a resubmission of an earlier scheme, recently decided at appeal, for a larger display screen on the same building façade but at a considerably higher level. The application documents comprise the following:

- Covering letter
- Advertisement Consent Application Form
- Site Location Plan
- Existing Elevations Plan
- Proposed Elevation Plan
- Photographs of Local Context
- Specification of the Display Sign
- Appeal Decision APP/X5210/H/12/2189379

Application Background

In August 2012 an application was made by Guy Greenfield Architects on behalf of our client for alterations to various parts of the external facade of

the hospital building that included the first and second floor façade at the junction of Tottenham Court Road and Euston Road and alterations to the uppermost east and west facing façade of the tower building and for the addition of the hospital name. The application was amended with the high level element of the scheme removed due to Council amenity objections. The application was refused by notice dated the 18th October 2012 on amenity grounds alone and the subsequent appeal against the decision was dismissed on the 11th July this year, a copy of that decision is enclosed with the application plans for ease of reference.

The previous scheme proposed a display screen measuring 12m wide by 6m high forming a curved area of display integrated into the curvature of the building corner and the existing glazing feature. For reasons of highway safety, at the request of Transport for London, the position of the screen on the building façade was elevated to a height over 9m above the street so as to avoid any visual conflict between the screen and the traffic light heads formerly located on the pedestrian island at Euston Circus.

The Inspector for the appeal found that the location of the application site was “*essentially commercial in character*” and dominated by large scale building and roads. He also accepted that the area include a “*great deal of advertising*”, However, he concluded that the position of the proposed display screen “*...well above the great majority of advertising material nearby*” together with the scale of the screen would make it appear “*...incongruous and excessively prominent...*” and thereby harmful to the character and appearance of the area.

Since that decision our client has considered the appeal Inspector’s comments and now proposes an alteration to the scheme to address the concerns regarding the scale of the displays screen, its relationship with the hospital building and detachment from the more obvious commercial aspects of the area. It is worthy note also that since the appeal decision there have been a number of changes to the surrounding road network and infrastructure, particularly the removal of the pedestrian island and traffic light heads which necessitated the elevation of the screen. We therefore feel that the amendments to the scheme, in terms of screen size and position, which is now possible to achieve, would present a more acceptable form of development that would not be against the interests of visual amenity or public safety.

Site and Surroundings

The site of UCH is located at the junction of Euston Road, Tottenham Court Road and Hampstead Road. The main interchange, known as Euston Circus, is immediately to the north of the hospital. It is a busy and vibrant part of town and a prominent location in north London. The A40 Euston Road underpass carries large volumes of traffic throughout the day, which has a significant impact on the character and appearance of the area. At street level on the deck spanning the underpass the pedestrian's and cyclist's experience takes second place to the car resulting in a harsh environment.

The Euston Road and Hampstead Road approaches to the appeal site are tree lined, which softens the hard concrete urban landscape, however the surrounding built form is substantial in scale with many large office buildings dominating the local area, particularly the outer edge of Euston Circus. Any concept of human scale has been lost in the evolution and development of the area.

The fully glazed façade of this frontage of University College Hospital is five storeys high with an additional second glazed "skin" to the corner front façade. It is this aspect of the building, as illustrated in the attached documents, which is the location for the proposed single display screen.

Proposal Detail

The revised scheme aims to strike a balance between creating a display screen that is visible and seen by passersby, which is evidently the main purpose of such development, without dominating the local area. Our proposal is designed to redefine this aspect of the building, to enliven the current view and create a more attractive and visually stimulating treatment.

In terms of the scale of the display screen, this will be halved from the previous proposal to 3m in height and 12m wide and fully integrated with the glazed outer skin, sections of which will be re-cut to present a seamless transition from screen to glazed feature. The screen will, as before, be curved to match the curvature of the building. In respect of the position of the screen on the building itself, this will now be located directly about the projecting canopy and confined to first floor level only. The height to the bottom of the screen will be 4.8m as opposed to 9.4m in the previous scheme.

The display screen will use the latest digital technology to provide clear images and that can be used to display a range of messages to include health related public information to promote healthy living and lifestyles as well as commercial messages to provide income for the Hospital. The integral display screen will also have the ability to display instant messages to alert travellers to security alerts and warnings, road closure and traffic delays. The screen will be operated entirely using Green energy and will display a maximum brightness of 600Cdm² during the hours of darkness, or 11p.m. to 6.00a.m, which is a level recommended by the Institute of Lighting Professionals for screens larger than 10m². The displayed image will change at regular intervals at a frequency to be agreed with the Council.

Policy Considerations

Local policy and guidance can be material considerations in the determination of applications relating to advertising development but only where the policy aims are applicable and related to amenity and public safety matters, the primary considerations in advertisement developments.¹ Nevertheless, it is considered that the previous scheme did not raise any specific policy objection, but was considered to harm character and amenity due to the screen size and position. The changes to the scheme overcome the amenity objection and we believe is generally supported by policy.

National Guidance

Circular guidance of advertising development and the interpretation of the regulations is contained within the Communities and Local Government Circular 03/2007 which remains extant guidance on this subject. Appendix E to the Annex of the circular explains the criteria for considering amenity issues in advertising proposal in greater detail. On the matter of general amenity, it states that Councils are to have regard to the general characteristics of a locality, “including any feature of historic, architectural, cultural or similar interest” (Para. 3) in making an assessment of an application for advertisement consent, and is generally supportive of advertising within

¹ Regulation 3 of the Town and Country Planning (Control of Advertisements)(England) Regulations 2007/783

commercial environments. More specifically, on the matter of scale, it advises that:

“poster panels should respect the scale of their surrounding location... when they are displayed on buildings, or as free-standing units alongside the highway, they should be related to the scale of surrounding buildings and have regard to the symmetry or architectural features of their location” (Para. 4).

The revised size of the display screen would be proportionate with the scale and mass of the host building. The appearance of the screen would not appear as an unrelated addition to the building but as a sympathetic alteration that respects the buildings architecture and complements the external detailing. In relation to the effect of the development on the local environment it is considered that the local context and character is accepted as being *“essentially commercial in character”* and as such suggests a display screen in this environment would not intrinsically appear incompatible or harmful to visual amenity. The scale of the local townscape and the contrasting building styles and architecture indicate that this environment is an appropriate context for this type of development without having a negative impact on local character.

Guidance is clear on the need to apply a consistent approach to assessing local character and therefore the presence of other advertising developments within close proximity to the appeal site, as recognized in the appeal decision, simply affirms the view that such a bustling and vibrant urban setting such as Euston Circus is an appropriate one for this manner of display screen. Overall the proposal would represent an appropriate form of development within the context of the location and is in accordance with Circular guidance.

National Guidance on the control of advertisements is provided within paragraph 67 of the National Planning Policy Framework (NPPF), which has superseded the more comprehensive advice contained within the erstwhile guidance in PPG19. Whilst much of the detailed advice has been removed, the support for sustainable forms of development remains a fundamental part of the guidance.

Advertising has always been seen as an important part of a diverse and vibrant market economy. Advertising promotes businesses, both foreign and

domestic, their products and services. A vibrant advertising sector contributes to sustainable economic growth by encouraging consumer confidence and consumer spending, a key component of economic growth. In this respect the development of advertising locations is consistent with the aim of sustainability in supporting a viable and a vital market. The NPPF promotes the planning system as an enabling one with paragraph 19 emphasizing the role of the planning system to support economic growth.

“The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system”

In respect of advertisements the NPPF states that:

“Poorly placed advertisements can have a negative impact on the appearance of the built and natural environment. Control over outdoor advertisements should be efficient, effective and simple in concept and operation. Only those advertisements which will clearly have an appreciable impact on a building or on their surroundings should be subject to the local planning authority’s detailed assessment. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.”

More generally, relevant core planning principles of the NPPF include the aim of securing high quality design in new buildings and encouraging vitality in urban areas, both of which are embodied in the proposal. Paragraph 63 states that in determining applications, great weight should be given to outstanding or innovative designs which help raise the standard of design more generally within an area. It is our view that this proposal is an example of innovative design that does enliven the area, adds to local character and distinctiveness and raises the standard and quality for design within the area. Therefore the proposal is in accordance with the NPPF.

Overall it is considered that the revised proposal accords with national and local policy guidance on outdoor advertisement displays. For the reasons outlined above it is also submitted that the proposal will not be against the interests of visual amenity and that consent should be granted.

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,



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