SUPPORTING STATEMENT APPLICATION FOR ADVERTISEMENT CONSENT

AT COMMONWEALTH HOUSE, ONE NEW OXFORD STREET, LONDON WC1

# DESCRIPTION OF APPLICATION

1.1 The display of a micromesh PVC scaffold screening shroud around the building incorporating two developer’s signs and one static advertisement for a period of 24 months. It is proposed that the shroud be erected onto the scaffolding in June 2015 in connection with the major works planned for the building .Parts of the scaffolding not covered by the advertisement will incorporate a 1:1 image of the building. The design for the shroud is taken from the developer’s brochure which has been produced for the re-launch of the building post-development. The developer’s brochure is included with this application.The works incorporate the implementation of the Planning Consent reference 2014/4983/P dated 30th January 2015 and include the demolition and reconstruction of 7th and 8th floors, erection of a roof extension at 9th floor level and infill works to provide additional B1 floor space and new roof top plant; at ground level alterations associated with shop fronts; replacement of all upper floor windows, recladding of the elevations and other enabling works.

1.2 The dimensions of the two proposed developer’s signs are 14m x 9 m each and advertisement sign is 5m x 9 m . The remainder of the façade area of the building will be non-advertising shroud carrying the design from the developer’s brochure for the re-launch of the building following completion of the redevelopment work.

1.3 The applicant, Outdoor Plus Limited, is one of the UK’s leading exponents of large- scale illustrated shrouds, scaffold advertisements and digital advertising screens. The company has carried out a number of similar screening projects in London and is a pioneer in the innovative use of new display techniques for screening construction sites and buildings.

1.4 The shroud will be in- situ and displaying advertisements during the period of redevelopment works to the building granted under Planning Consent 2014/4983/P and will be removed on completion of those works when the scaffolding is removed. The work is scheduled to start in June 2015 and end in June 2017. This programme is detailed on page 20 of the developer’s brochure.

# GENERAL CONSIDERATIONS

2.1 Within the wider planning framework, there are some controls specific to shroud advertisements. Shroud/banner advertising falls under the definition of an advert requiring express planning consent from the local planning authority. In making their decision, the two issues the local planning authority can consider are:

2.1.1 The impact on amenity (visual, aural of the immediate neighbourhood);

2.1.2 Impact on public safety.

NPPF policy aims to achieve the sustainable development and positive improvement to the built environment. Paragraph 67 states “only advertisements which clearly have an appreciable impact on a building or their surroundings should be subject to local planning authority’s detailed assessment”.

2.2 Paragraph 154 of Circular 03/2007 specifically relates to shroud and large advertisements and states, “that buildings which are being renovated or are undergoing major structural work and which have netting around them may be potential temporary sites for shroud advertisements or large wrap advertisements covering the face or most of the face of the building. In all cases express consent will be required for these advertisements that can remain in place until the netting is removed. These advertisements should be considered on a site specific basis taking account of amenity and public safety issues”.

2.3 Local planning authorities can formulate their own specific policies indicating what detailed considerations they take account of. These policies and guidance statements should not be the only deciding factor and each case should be considered on a site-specific basis. Camden Council’s own policies and guidance accepts on a temporary basis shroud/banner advertisements where used to shield unsightly construction works to a building.

2.4 The temporary nature of the shroud only being required until the works are completed needs to be taken fully into account.

# SITE LOCATION/DESCRIPTION

3.1 Commonwealth House is a triangular building located on a triangular site adjoining New Oxford Street to the north, High Holborn to the south and Dunn’s Passage to the west. The building is not listed though it is just within the southern tip of Bloomsbury conservation area. One developer’s sign is to be placed on the New Oxford Street façade and one developer’s sign and one advertisements are to be placed on High Holborn facade .The site is located at the Southern end of Camden Borough in a central London location attracting the usual mix of shopping, nightlife and tourists’ accommodation. The general character of the area is commercial with the mix of uses largely comprising retail and related uses at ground level and commercial offices above.

# DETAILS OF THE PROPOSAL

4.1 The Applicant is working closely with TIAA Henderson Real Estate, the developer, who wishes to raise additional funding to contribute to the works programme and also to benefit from the installation of the scaffold shroud which informs the public of the redevelopment and re-branding of the building. TIAA Henderson Real Estate have entered into an agreement with Outdoor Plus Limited who will sell advertising on the shroud. The full extent of the redevelopment works are detailed in the works schedules and plans accompanying the application reference 2014/4983/P. A copy is included with this application.

4.2 This project is a significant redevelopment of a large central London property and will have a positive contribution to the area’s economy. The Council’s evaluation of the application explained how these works would enhance the character and appearance of both the building and this part of the Bloomsbury conservation area causing no harm to locality and surrounding buildings. To implement this recent permission the building will need to be scaffolded and shrouded. The applicant will be working closely with developers to achieve the project aims including the overall programme of works and scheduling.

4.3 The scaffold safety screen is, in any event, a health and safety requirement while the works are carried out to the building. The screening is a highly effective measure in preventing debris falling whilst also protecting the façade(s) of the building while works are being undertaken in a much more efficient way than traditional scaffolding mesh. The safety screen has many applications in addition to those mentioned; not least weather protection, which allows the works to continue during adverse conditions. Further, given the proximity to the streets (on all sides) an additional screen of this nature is highly advisable.

4.5 The colour and content of the advertisement display panel will vary during the period, however it will consist of simple graphics and limited typography, complying with the standards and regulations laid down in the Code of Advertisers Practice by the Advertising Standards Authority. The area of the High Holborn façade is 1860.2 m2 .The commercial advertisement display panel occupies an area of 54 m2 which equates to 2.9% of the façade and the developer’s sign measures 126 m2 which equates to 6.7% of the façade area and thus the combined area of the developer’s sign and the advertising sign at 9.6% fall within Camden Council’s planning guidelines for this type of advertisement which specify a maximum display area of 10% for buildings in conservation areas. The New Oxford Street façade measures 1805m2 and the developer’s sign measures 126 m2 equating to 6.9% and thus falls within the guidelines.

4.6 The shroud will be of a high quality, constructed from micromesh PVC and will be maintained to a high standard. This form of PVC mesh allows for both light and air circulation within the building being shrouded. TIAA Henderson Real Estate has informed the applicant they are satisfied the shroud meets their operational requirements for the use of the building. The materials are capable of being recycled. The appearance and maintenance of the shroud to this high standard is of significant benefit. If the Applicant was not involved in this project TIAA Henderson Real Estate may use standard scaffolding plastic sheeting or netting. This type of screening normally becomes ragged and tatty fairly quickly and is often not well maintained. This type of sheeting would fail to maintain or improve the visual amenity of the area whereas the current proposal incorporating the advertising will, for the temporary period of redevelopment, enhance the appearance of a site that is clearly undergoing major construction work

# RELEVANT SITE SPECIFIC ISSUES AND CONSIDERATIONS

1. 1 This application ought to be fully considered in the context of its temporary nature where permission is sought only for a period of 24 months. The following section deals with the impact of amenity and safety of the proposal along with other relevant considerations.

* 1. Public Safety

* + 1. The general criteria used when assessing any public safety issues where advertisements are concerned is set out in Appendix B to the Annex of Circular 03/2007. The proposal has been assessed against those tests. The type and location of the proposed advertisement display will not create a hazard or danger for the following reason:

* + - 1. The type of advertising display proposed does not require a close study nor would it obstruct or confuse any road users in terms of their use of the road, statutory road signs or traffic control.

* + - 1. The proposed display is not unusual. It is static and will have a good range of visibility, providing appropriate sight lines, thus the display will not appear as a sudden feature or present itself as a road hazard.

* + - 1. The simple typography and graphic elements normal to this type of advertisement display media are specifically designed to be readily assimilated, understood by road and pedestrian users in the vicinity.

* + - 1. Implications to road users will be negligible. The site is within an area where traffic access and speeds are controlled.

* + 1. Having carefully considered the positioning of the shroud banner advertisement, the applicant is satisfied that there is no impact on public safety or highway safety. Both the national and local Camden Council policies encourage improvements to the built environment and are permissive of this type of proposal.

* + 1. The site is in a busy and vibrant commercial location where a variety of different forms of signage are commonplace.

* + 1. The shroud adds a temporary addition to the landscape of the area and will enliven the vista and provide a point of interest to the frontage whilst works take place to the building.

* + 1. There is a significant and longer-term public benefit to be derived from approving this proposal as part of the overall project for the building granted permission under planning reference 2014/4983/P bringing with its implementation other benefits via the associated S106 obligations. The external appearance of the building will be significantly improved and contribute positively to the street scene in the future and the advert shroud as a temporary measure during construction will fully support the project to achieve these aims.

# CONCLUSION

6.1 The Council’s own policies on scaffold/shroud advertisements are that they are acceptable where associated with works and for a temporary period. In this case, the location of the advertisement on the shroud, the scale and context are appropriate to the building and it is acceptable in highway safety terms.

6.2 It is felt that this application proposal meets the criteria of both the local and national policy considerations. In such a busy commercial location, the proposal would provide an aesthetically acceptable, temporary addition to the street scene.

6.3 The display for a temporary period of a well maintained shroud advertisement is far superior to the type of netting or plastic that would ordinarily be used by a building contractor. High quality well maintained screening to what would otherwise be a bland and untidy introduction to the street scene of the shroud screen benefits the visual amenity of the location during the temporary period of the building works.

6.4 Camden Council, like other authorities, is keen to secure improvements to the buildings and the public realm within their area. This is why temporary shrouds and advertisements are recognized to have a place in locations such as this. The Council will be aware that planning permissions for similar applications have been granted. A proposal for a temporary shroud and advertising was granted at St George’s Court, Bloomsbury Way, WCI in February 2014 under planning reference 2014/0637/A and the period of consent was further extended in December 2014, planning reference 2014/6777/A, in order to fit the programme of building works and improvements being undertaken to the building. That proposal is similar to the subject proposal in its’ location, building type and shroud and advertisement design.

A similar advertising shroud consent was granted at 150 High Holborn under planning reference 2013/4086/A.

6.5 The proposal will not detract from the appearance of the surrounding site or the host building while the works are undertaken, nor would it be detrimental to public safety. The Applicant considers this application supports the longer-term redevelopment of the building.

6.7 The Applicant is very happy to discuss the details and provide any further information requested by the Council for their consideration of the application. It is hoped that the Council will consider this application favourably and grant the permission sought.

Guy Goodyear

Outdoor Plus Limited