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**To:** Jagdish Akhaja  
**From:** John Duffy  
**Date:** [63](#) July 2015  
**Re:** **St Giles Hotel, Bedford Avenue, London, WC1B 3GH**  
*Display of 1x digital display screen (6.0 x 39.8 metres) to Tottenham Court Road elevation at 1st and 2nd floor level.*

**Reference:** 2015/3210/A

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## TRANSPORT OBSERVATIONS

The site is located on the eastern side of Tottenham Court Road and is bordered to the north by Bedford Avenue, to the east by Adeline Place and to the south by Great Russell Street. The Tottenham Court Road ground floor frontage comprises retail units with a casino at first floor podium level and the St Giles Hotel occupying the upper floors of the buildings above.

The proposed development comprises the installation of large digital advertising screens which would cover the Tottenham Court Road frontage at first floor podium level (33m wide by 6m tall), with additional side return screens on the Bedford Avenue and Great Russell Street frontages (each measuring 3.4m wide by 6m tall). The total area of display is 238.8sqm.

The digital LED screens will be internally illuminated and whilst the images will be static it is likely that they will change at frequent intervals. The Planning Submission states that single or multiple images could be displayed on the screens.

Transport Strategy object to the proposals on the grounds of highway safety and amenity.

The proposed advertising screens are contrary to policies:

- CS5(c) as they do not contribute to spaces of the highest quality;
- CS5(d) as they do not protect or enhance the environment or the amenity of the local community;
- CS14(b) as they do not preserve or enhance the adjacent conservation areas or listed buildings;
- CS14(c) as they do not contribute towards high quality streets or public spaces;
- DP21(h) as they do not avoid harm to highway safety, [they could potentially hinder pedestrian movement](#), and they represent unnecessary visual street clutter;

- DP21(i) as they do not contribute towards the creation of high quality streets or public places; and
- DP24(a) as they do not consider the character, setting, context or the form or scale of neighbouring buildings.

With regard to the Planning Practice Guidance on Advertisements, issued by the Department of Communities and Local Government in March 2014, the proposed development is considered to represent a danger to road users with regard to criteria:

- b) because of its size and siting the advertisement would confuse a road user's view and would be likely to distract road users because of its unusual nature;
- d) iii. because of its size would distract road users; and
- d) iv. because it will be subject to frequent changes of display.

The proposed advertisement, due to its extremely large size and location would be seen for some distance by vehicles approaching the site on Tottenham Court Road and Bedford Avenue. Nevertheless, due to its sheer size and the changing nature of the images displayed the advertisement is likely to act as a distraction to motorists travelling northwards on Tottenham Court Road as they approach the junctions with Great Russell Street and Bedford Avenue. Similarly, motorists travelling westwards on Bedford Avenue are likely to be distracted as they approach the junction with Tottenham Court Road.

For Tottenham Court Road motorists, this distraction could lead to rear shunt accidents on the approach to the Great Russell Street junction as vehicles slow down or wait to turn right, and on the approach to the Pelican signals to the north of Bedford Avenue where vehicles often queue back towards the site. Distracted motorists who are turning right also might not notice pedestrians crossing Great Russell Street as they turn which could lead to pedestrian injuries. Similarly motorists wishing to turn ~~left~~ right out of Bedford Avenue might not notice pedestrians crossing in front of them ~~asa~~ they approach the Tottenham Court Road junction.

This area is known to suffer from a relatively high number of rear shunt and pedestrian accidents relating to the Tottenham Court Road junctions with Bedford Avenue and Great Russell Street and the Pelican crossing to the north of Bedford Avenue. This is due to a combination of the high traffic and pedestrian flows. The proposed advertisement could lead to an increase in accidents at these locations due to motorists and also potentially pedestrians being distracted by the extremely large and changing nature of the advertisements. This distraction could be compounded if multiple images are displayed at the same time.

In terms of amenity, the proposal will detract from the de-cluttering and public realm improvements which are due to be carried out as part of the Tottenham Court Road two-way scheme (also known as the West End Project). This project seeks to improve the whole of Tottenham Court Road and the surrounding streets— (including Bedford Avenue and Great Russell Street) by widening footways, making it safer for pedestrians, improving facilities for cyclists, reducing congestion, and introducing new street trees and green spaces amongst other

measures to improve the overall look and feel of the area, including removing large advertising hoardings wherever possible.

The West End Project will make Tottenham Court Road two-way for buses and cyclists. In addition, some sections of the street could potentially allow access for other motor vehicles outside of peak times (e.g. to facilitate east/west movement through the area). Once complete, cyclists and drivers travelling in both directions could be distracted by the advertisements. It is common knowledge that the majority of collisions involving cyclists and/or pedestrians occur at junctions. The proposal would therefore be potentially harmful to public safety at the junctions directly adjacent to the western façade of the property.

Pedestrians intending to cross the road in the vicinity of the property could also be distracted by the advertisements. This could lead to dangerous situations where pedestrians fail to notice vehicular traffic as they attempt to cross the road. This can be a particular where vehicles are quiet (e.g. bicycles and electric vehicles) as pedestrians would not necessarily hear them approaching.

Bullet point h on the summary page of DP21 states that the Council will expect works affecting highways to avoid causing harm to highway safety or hinder pedestrian movement and avoid unnecessary street clutter. The main element of the proposal would be located directly adjacent to arguably the busiest pedestrian environments/route in the borough. It is worth noting that pedestrian flows are projected to increase significantly in the local area once Crossrail trains become operational and once the Council delivers the West End Project which will transform the public realm in the area. The proposal could lead to pedestrians stopping to view the information being advertised on the screens. This would hinder pedestrian movement which would have a detrimental impact on pedestrian comfort and amenity. It could also lead to dangerous situations where pedestrians are forced to walk in the carriageway. This would obviously be hazardous due to conflicts between pedestrians and vehicular traffic.

Formatted: Justified

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**To:** Jagdish Akhaja  
**From:** John Duffy  
**Date:** 3 July 2015  
**Re:** **St Giles Hotel, Bedford Avenue, London, WC1B 3GH**  
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**Reference:** **2015/3210/A**

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- CS14(c) as they do not contribute towards high quality streets or public spaces;
- DP21(h) as they do not avoid harm to highway safety and they represent unnecessary visual street clutter;

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## Akhaja, Jagdish

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**From:** Cardno, Steve  
**Sent:** 06 July 2015 09:32  
**To:** Duffy, John; Akhaja, Jagdish  
**Cc:** Hammond, James  
**Subject:** RE: Bedford Ave St Giles Hotel re Obs  
**Attachments:** Bedford Avenue, (St Giles Hotel), 2015-07-06, Draft Obs (SC edits).doc

**Importance:** High

**Follow Up Flag:** Follow up

**Flag Status:** Flagged

**Categories:** Red Category

Hi Jagdish

I agree with John but would like to add a few things.

DP21 summary page, bullet Point h. This states that the Council will expect works affecting highways to avoid causing harm to highway safety or hinder pedestrian movement and avoid unnecessary street clutter. The main element of the proposal would be located directly adjacent to arguably the busiest pedestrian environments/route in the borough. It is worth noting that pedestrians flows are projected to increase significantly in the local area once Crossrail trains become operational and once the Council delivers the West End Project which will transform the public realm in the area. The proposal could lead to pedestrians stopping to view the information being advertised on the screens. This would hinder pedestrian movement which would have a detrimental impact on pedestrian comfort and amenity. It could also lead to dangerous situations where pedestrians are forced to walk in the carriageway. This would obviously be hazardous due to conflicts between pedestrians and vehicular traffic.

I have attached revised obs with track changes.

Regards

Steve

Steve Cardno  
Principal Transport Planner

Telephone: 020 7974 8800

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**From:** Duffy, John  
**Sent:** 03 July 2015 17:52  
**To:** Akhaja, Jagdish  
**Cc:** Cardno, Steve; Hammond, James  
**Subject:** Bedford Ave St Giles Hotel re Obs

Hi Jagdish,

Further to our conversation please find attached my draft observations on 2015/3210/A.

These are subject to further comment from Steve Cardno/James Hammond, but I wanted to at least get something in before I head off on leave.

Kind regards,

John Duffy

Transport Strategy

Telephone: 020 7974 3343