



Anna Roe
Planning and Built Environment
Camden Council
Town Hall Extension
Argyle Street
London

18th August 2016

REF: 121 Finchley Road, Swiss Cottage

Dear Ms Roe,

This statement has been prepared to support an application for planning and advertising consent to secure the upgrade of an existing longstanding advertising hoarding on the northern elevation of 121 Finchley Road from an internally illuminated format to a digitally illuminated format, along with an associated building lighting scheme.

Site and Surrounding Area

The application site is located on the blank brick façade of the northern flank elevation of 121 Finchley Road in the Swiss Cottage ward of the London Borough of Camden. The host building is a four storey block with retail units on the ground floor and residential units on the upper floors. 121 Finchley Road protrudes from the prevailing building line partially exposing the northern façade of the building. This otherwise unattractive and uninteresting façade has supported a backlit advertising display for a number of years.

The development surrounding the site is large in scale, with the closest adjacent building to the site being the nine storey commercial office building "Overground House".

According to the Camden Proposals Map, the site is located within the designated Town Centre. The site is not constrained by any conservation areas or listed buildings.

Finchley Road is typical of its Town Centre designation, with a mixture of offices, ground floor retail units with residential above, and entertainment facilities. Street lights and the illuminated signs and window displays of the various commercial uses ensure the area has a vibrant character and is brightly illuminated at night.

The site is seen primarily from the A41/Finchley Road, with the target audience being vehicles travelling southbound and queuing at the traffic lights.

Planning History

There is recent planning history associated with the use of the site for advertising that is material to the consideration of this proposal. In August 2012 an application for the *"retention of an internally illuminated advertising panel measuring 4.5m by 3m wide attached to the side elevation at first floor level"* was allowed at appeal. (Appeal Ref:

APP/X5210/H/12/2170846). This proposal was assessed against the 2007 Advertising Regulations, 2010 Core Strategy and 2010 Development Policies, which remain the most up to date development control policies in Camden. Whilst sections of the Camden Planning Guidance SPD have been updated since 2012, the section on advertising remains the same as that considered by the Inspector in this instance. As such, the conclusions reached by the Inspector should carry significant weight in the determination of this proposal. Whilst the full decision can be seen at **Appendix 1**, specific attention should be drawn towards Paragraph 8, where;

- The Inspector acknowledges that although above fascia level, the proposal would relate satisfactorily to the design and scale of the host building;
- The Inspector makes an important distinction that although the advert is prominent when viewed from the north, it is not unduly dominant or intrusive, particularly given the scale of the adjacent building;
- The Inspector notes that the advert would add colour and interest in a noticeably drab part of the streetscape.

Furthermore, at Paragraph 11 it should be noted that the Inspector considered a maximum luminance of 600cd/sqm to be acceptable in this location, and at Paragraph 12 it was concluded that the proposal would not add to visual clutter.

The above comments set a baseline for the determination of this application and are entirely relevant considerations for the proposal application.

Pre-Application Feedback

In advance of the submission of the application, Vision Sites sought pre-application advice on the form of the application and the proposals. The purpose of the meeting was to seek officers' agreement over the best design solution for the upgrade of the site. A pre-application meeting was held with Anna Roe on 22nd June 2016.

At the meeting concerns were raised regarding the policy compliance of the proposal and of the visual impact of the proposed design and its relationship with the host building. Concerns were also raised regarding highways safety due to the belief that the proposed display could prove to be a distraction to drivers on Finchley Road.

Further discussion was held following the meeting and a formal written response was received on the 21st July 2016. This was shortly followed by additional comments from highways dated 28th July 2016.

The pre-application response identified the Camden Streetscape Manual and the Camden Planning Guidance SPD's on Design (CPG1) and Amenity (CPG6) as being key policy documents to consider. In particular it was cited that the CPG1 stated that *'advertisements above fascia level can appear visually obtrusive and unattractive and, where illuminated, they can cause light pollution to neighbouring residential properties. If an advertisement is required at high level for a specific business use then this will usually be restricted to non-illuminated images on windows'*.

Whilst it is noted that the above advice is intended to be applied to "all advertisements" this is an all encompassing piece of guidance which covers a very broad range and which is not well suited to the consideration of large format advertising hoardings, most of which will be located above fascia level. In fact as there are so few examples of hoardings which would be located below fascia level it would be expected that for this advice to be relevant, it would need to be specifically included in the guidance for advertising hoardings at Paragraphs 8.16 to 8.19 of the

document. Instead, the section on hoardings is set out as an entirely new section to the one on “all advertisements” where the advice quoted above appears, which indicates an acknowledgement that their consideration requires a different approach to other forms of advertisement such as business signage.

In support of this point, it is noted that at paragraph 8.17 there are a number of bullet points setting out circumstances where hoardings may be unacceptable. If the intention was to try to limit large advertising hoardings to below fascia level it would be expected that this would be listed here.

Furthermore, as set out in the previous section it should be noted that this point has already been specifically considered by a Planning Inspector and dismissed as a reason for refusal. As such, the initial policy based objection provided at pre-application stage should be revisited as part of the overall consideration of the proposal.

In addition to the policy appraisal, officers provided advice on the design of the proposal presented, and on the form of the application. It was recommended that the design be revisited and paired back to enhance the existing external fabric of the building rather than adding to it. It was also advised that any additional work to the gable wall would require an accompanying planning permission and would not be capable of being undertaken under the advertising regulations. As a result of the advice received, the proposal presented at pre-application stage has been significantly amended in order to reduce its overall impact. Instead of the rear illuminated steel cladding previously proposed, the gable wall will be repainted, the canopy above the shops extended, and external architectural lighting added to assist with assimilating the advertisement with the host building.

The application is submitted for Planning and Advertisement Consent in order to secure the accompanying improvements.

Finally, in response to the comments received at pre-application stage from the highways department, the applicant can confirm that the proposal will not display moving images as this may be considered distracting. As advised the proposals follow the advice set out in Transport for London (TfL) Guidance for Roadside Digital Advertising and an Advertising Safety Guidance Form (ASGF) has been completed by Waterman’s Transportation, the original authors of the TfL report.

Background

The out of home advertising market is undergoing a period of rapid change as the demand for digital media increases. This shift in focus has led to falling numbers of billboard sites nationwide as investment in new technology is targeted towards the best and most viable sites, with lower quality (e.g. temporary sites on residential streets with limited viewing) either being voluntarily decommissioned through lack of demand, or enforced and discontinued by Local Planning Authorities seeking to declutter the streetscene.

The application site has the potential to attract investment, being in a town centre location on a major thoroughfare. The proposal seeks to achieve this through securing consent for a digital media display and through improving the immediate setting of the signage. Brands always want to be associated with quality and providing signage in the right location, will pay a premium for better quality design. As such there is an opportunity to capitalise on the investment in digital media and to improve the built environment.

Proposals

In response to advice received at pre-application, the proposal has been amended to seek to repair the existing fabric of the host building rather than to screen the unattractive parts of the gable wall with feature cladding. The existing signage on the site will firstly be removed allowing for a pressure clean of the walls and shop front canopy. The canopy and the ground floor of the gable wall will then be repainted white providing the building with an instant facelift. To assist with integrating the proposed new display with the building, the shop front canopy will be extended outwards to the same depth as the display. Mirroring this, there will be new cladding pieces at the top of the first and second storey levels which will accentuate the lines of the existing building features and will house lighting strips. The lighting will be "ambient" and will assist in integrating the illuminated main display with the gable wall. The proposed lighting will be designed and installed in accordance with ILP Guidance Notes on the Reduction of Obtrusive Light (GN01:2011). On the basis that the site would be considered as "Environmental Zone 4" this would mean an average luminance of 25 Lux.

As discussed during the pre-application meeting, it is necessary to marginally increase the height of the display from the existing in order to create a format which meets the market requirements for out of home digital advertising. In response to the comments made at pre-application it has however been decided to keep the advert in the same location as previously and not to raise it any higher up the building. As such the change in size would be extremely minor in its material impact. Details of the design are included in the supporting plans.

In summary, the application seeks advertisement consent for consent for the upgrade of the existing 3m x 4.5m illuminated hoarding on the northern flank wall of 121 Finchley Road with a 3m x 6m digital LED display. The proposal includes minor building works that will improve the general amenity of the area and add visual interest to the site.

Operational controls

The brightness of digital advertisement displays is fully controllable and can be reduced to within 1% of the maximum output. The maximum luminance levels of the screen at night will not exceed 300 cd/sqm which is half of the maximum amount allowed under the previous consent and brings the site in line with current guidance limits suggested in the Institute of Lighting Professionals (ILP) Technical Guidance Note 5 (2015), which relates specifically to illuminated advertisements. During the day, particularly during periods of bright sunshine, the luminance will be increased in order for the screen's content to remain visible. An ambient light sensor will control these levels automatically and thus the screen would not be perceived as being any brighter. This will also allow the level of luminance to be sensitive to the change in sunrise and sunset from summer to winter. The proposal will not therefore cause any glare, which could distract drivers, or cause light trespass.

It should be noted that there is no commercial imperative for an overly bright screen and there is a cost associated with displays that are run at higher levels of luminance. As such, should the Council consider a lower luminance level to be justified, the applicant will give this due consideration.

The performance and quality of LED products has increased dramatically over the past few years which has led a revolution in their use for all types of displays ranging from televisions, computer screens and tablets to outdoor media. The reason for this is their durability and reliability alongside their low energy consumption. The use within outdoor media also means that vehicle trips can be dramatically reduced as

there is no need to regularly visit the site to repost adverts. In this regard everything is controlled centrally and wirelessly. This allows quick response to events and increases the potential for signage to carry public messaging alongside the use for advertising.

Only static images (i.e. no moving images or flashing lights) will be displayed, but it will be capable of changing to display new adverts every ten seconds depending on how the advertising space is sold. This is in line with standard industry units for sale of advertising space. The changeover between adverts will take place instantly in line with established best practice.

In order to control the operation of the display the following conditions are proposed. These conditions have been applied elsewhere and represent current best practice:

- The intensity of the illumination of the signs shall not exceed 300 cd/sqm from dusk till dawn;
- The architectural lighting shall be designed and installed in accordance with the ILP Guidance Notes on the Reduction of Obtrusive Light (GN01:2011);
- Any change in advertisement display shall be instantaneous;
- The signs shall not display any moving, or apparently moving, images; and
- The advertisements displayed on each panel shall not change more frequently than once every 10 seconds.

Planning Considerations

National Policy Overview

According to the National Planning Policy Framework (NPPF), advertisements should be subject to control only in the interests of amenity and public safety, taking into account cumulative impacts.

The NPPF places great importance on the design of the built environment and as such is a key aspect of sustainable development.

Paragraph 9 of the NPPF states that pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment. Amongst other things this includes *"replacing poor design with better design"* as is the central aim of the application proposal.

The NPPF is a pro-growth document which includes a *"presumption in favour of sustainable development"*. The Government's economic policy objective is to achieve strong, sustainable and balanced economic growth. Advertising plays a key role in a dynamic economy, attracting investment from foreign companies and stimulating consumer spending at home. Advertising can also help companies to increase their profile and grow. Successful companies create more jobs, pay more tax and contribute directly to economic growth.

The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 is the legislative framework upon which the NPPF is based. Regulation 3 states that advertising should be controlled in the interest of amenity and public safety taking into account the provisions of the development plan, in so far as they are material, and any other relevant factors.

The DCLG has produced informal guidance in the publication "Outdoor Advertisements and Signs: A Guide for Advertisers". The DCLG guidance provides broad-brush definitions of what is meant by the terms 'amenity' and 'public safety' and some general guidance on assessing proposals.

Further advice is included within the National Planning Practice Guidance (NPPG). The advice on amenity serves as a reminder to Local Authorities that large format advertising is acceptable in principle in the right locations, and states:

"...In assessing amenity, the local planning authority would always consider the local characteristics of the neighbourhood: for example, if the locality where the advertisement is to be displayed has important scenic, historic, architectural or cultural features, the local planning authority would consider whether it is in scale and in keeping with these features. This might mean that a large poster-boarding would be refused where it would dominate a group of listed buildings, but would be permitted in an industrial or commercial area of a major city (where there are large buildings and main highways) where the advertisement would not adversely affect the visual amenity of the neighbourhood of the site."
(Paragraph 79)

Considering the proposal against the above it is entirely appropriate for an advertisement to be located in a town centre location such as this, where the opportunity to significantly impact on visual amenity is very limited. The impact of the proposal in amenity and road safety is considered in more detail later on.

Local Policy Considerations

Local policies alone cannot be used to determine an application for advertisement consent, but are a material consideration in assessing amenity and public safety impacts.

Camden's Local Plan consists of the Core Strategy, the Development Policies, the Camden Planning Guidance and the Site Allocations. Although Camden does not have a specific advertisement policy, regard is given to Core Strategy Policies CS5 (Managing the Impact of Growth and Development), CS14 (Promoting High Quality Places and Conserving Our Heritage) and CS17 (Making Camden a Safer Place) along with Development Policies DP17 (Walking, Cycling and Public Transport), DP21 (Development Connecting to the Highway Network), DP24 (Securing High Quality Design) and DP26 (Managing the Impact of Development on Occupiers and Neighbours) when assessing advertisement applications.

The Supplementary Planning Documents, Camden Planning Guidance 1 – Design, and Camden Planning Guidance 6 – Amenity, are also considered when assessing advertisement consent applications, as is the Streetscape Design Manual, which informed the development of the CPG's but contains no specific guidance in relation to large format out of home advertising.

Chapter 8 of CPG1 deals directly with advertisements, signs and hoardings. The guidance states that the most satisfactory adverts are those which take into account:

- The character and design of the property;
- The appearance of the surroundings; and
- The external fabric of the building.

As set out earlier in the section relating to the pre-application discussion, the Council's approach towards assessing applications for large format advertising hoardings/billboards is set out in paragraphs 8.16 to 8.19 of CPG1.

Paragraph 8.17 states that *"if an area has a mix of uses or is predominantly in commercial use some poster or hoarding advertising may be acceptable where they satisfactorily relate to the scale of the host building or feature and its surroundings"*. The circumstances where hoardings are not considered acceptable are set out in a bullet point list in paragraph 8.17 as follows:

- Locations where they may prevent or significantly damage views or obscure light;
- Locations where they are forward of the face of adjoining buildings;
- Locations where they project above roof ridge/eaves level;
- Locations where they obscure architectural features or landmarks (including windows or window recesses); and
- On side walls where they would be unduly dominant.

It is considered that the proposal passes the above test, being on a non-descript side wall and not protruding from the face of a building or above a roof ridge. The test of whether an advert on this side wall location is "unduly dominant" has already been carried out by a Planning Inspector who noted that the scale of the adjacent Overground House would provide a context of sufficient magnitude to ensure that an advertising display would not dominate it.

In circumstances where a display is considered acceptable Paragraph 8.17 expects that *"they should be designed and positioned as an integral feature of the building"*. The proposal seeks to achieve this as set out in the previous section.

Paragraph 8.19 states that the impact of illumination will be taken into consideration and where it is seen to be a nuisance or out of character it will not be acceptable. The proposal is for an illuminated sign and also includes ambient illumination of the area around the sign. It is considered that by softly lighting the wall the transition between the illuminated display and dark brick wall will be less stark. The proposed lighting would be cast back onto the wall and as such will enhance the site whilst not increasing prominence or causing a nuisance. The lighting has been designed with due regard to the ILP Guidance Notes on the Reduction of Obtrusive Light (GN01:2011).

In all other regards the proposal complies with Council Policy. With reference to residential amenity, Core Strategy Policy CS5 (Managing the Impact of Growth and Development) Part (d) refers to protecting and enhancing the amenity of local communities and part (e) states that the impact of development on neighbours must be fully considered. Similarly, Development Policy DP26 (Managing the Impact of Development on Occupiers and Neighbours) seeks to protect residential amenity. The application proposals comply with Policy CS5 and Policy DP26 in that the orientation of the display is away from residential properties.

With reference to design, Core Strategy Policy CS14 (Promoting High Quality Places and Conserving Our Heritage) part (a) requires high quality design in developments in a manner that "respects local context and character". Development Policy DP24 (Securing High Quality Design) requires that alterations to buildings consider the character of the existing (part a) and adjacent buildings (part b) along with the quality of the materials used (part c) and the "provision of visually interesting frontages at

street level" (part d). The proposal seeks a light touch way of enhancing the site by concentrating the existing building features. Through the use of high quality materials to accompany the high tech signage, the site will be significantly improved as an advertising display and will help to tidy up the host building and improve the street scene.

In addition to the above, the proposals comply with Core Strategy Policy CS17 (Making Camden a Safer Place), part (e) of which seeks to promote safer streets. Investing in cleaning up "grot spots" has a positive effect on promoting safer streets.

The applicant has also considered the necessity to comply with Development Policy DP17 (Walking, Cycling and Public Transport), part (b) of which calls for "convenient, safe and well-signalled routes". Policy DP21 (Development Connecting to the Highway Network) also stresses the importance of avoiding causing harm to highway safety in part (h). The applicant has engaged with Waterman Group who have completed a TFL Advertising Safety Guidance Form as recommended in the written pre-application advice response. The submitted form demonstrates that the advertisement will not be detrimental to public safety.

Amenity

Notwithstanding the above, in accordance with the Advertisement Regulations (2007) all applications for advertisement consent should primarily consider the impact on amenity and public safety as set out in the NPPF.

The meaning of amenity can be wide ranging. In the context of assessing advertising, it is usually defined as being the impact on visual or aural amenity in the immediate neighbourhood. National Planning Practice Guidance (NPPG) makes it clear that the character of the local area is material to the consideration of impact on amenity. In this instance the proposal site is in a vibrant town centre location with large scale commercial development surrounding. It is not in a conservation area or close to any listed buildings or buildings of local merit. This type of environment is robust and can easily accommodate advertising and other forms of illuminated signage. Whilst there is only one other example of large format advertising in the town centre (possibly due to the lack of appropriate sites), there is a plethora of other signage including illuminated shop fascia signs, advertising on bus shelters, and advertising on telephone kiosks.

The existing illuminated advertising panel at the application site has been in situ for 4 years having originally been allowed at appeal in 2012. There has been no material change in the context of the site since the appeal was allowed and the policy context it was assessed against also remains the same. As such, the site can be considered as acceptable in principle for advertising and as a baseline, a 3m x 4.5m, 600cd/m² illuminated display is not considered to be harmful to amenity in this location. The assessment of the proposal must therefore consider whether the change to a 3m x 6m, 300cd/m² digitally illuminated display (with sequential changes in advert), is considered to have a material impact and whether this impact is harmful to the amenity of the area.

Considering first the materiality of the changes, it is noted that whilst the level of illumination will decrease, the size of the display is to increase and the advert being displayed will now change every ten seconds rather than being reposted every two weeks. The size of the proposed display has been selected to meet market requirements and to make the investment to digital viable. It is not considered that the increase in the size of the display is materially significant in the context of the scale of the surrounding built development. The position of the base of the display is exactly the same as that previously allowed at appeal. The format and orientation fits

in with the scale and size of the flank wall and the increase in height will not encroach on, or exceed, the ridge height of the building.

Returning to the previous appeal decision, it is worth noting again that the appeal Inspector commented that *"the host building itself is of no great distinction architecturally and its flank wall is not an asset to the street scene"*. As such the increase in height of the display would not harm the building or the street scene. Furthermore, the Inspector concluded that the proposed illuminated panel *"would be positively advantageous to amenity"*. As the current proposal proactively seeks to clean up the gable elevation and create a more attractive advertisement site, it can reasonably be concluded that the impact of the changes would be seen as having a positive effect on amenity rather than negative.

The changes proposed would therefore be consistent with the NPPF requirement that poor design be replaced with good design.

Whilst the display will be set within a primary commercial environment, it is noted that there are residential properties in proximity and as such the impact on residential amenity requires consideration. As the nearest properties face away from the proposal they will remain unaffected by the proposal. This was recognised in the written pre-application response. Furthermore, the display is fully controllable and will be set within stricter guidance limits set by the ILP in 2015, meaning the maximum level of illumination is halved from 600cd/m² to 300cd/m². The hours of illumination can also be limited by condition if the Council deems this to pass the test of being necessary.

In summary, the previous consent establishes the principle of advertising at this location. It is considered that the upgrade of the advertisement to digital and the bespoke designed mounting would have a positive impact on the area in amenity terms.

Public Safety

Digital advertisements are now a common sight alongside roads in major cities and as such are not an "unusual" distraction for drivers. Despite the increasing number of digital advertising sites, research on roadside advertising has not provided any evidence of an increase in accident rates in proximity to digital signage.

The available research suggests that drivers always give priority to the driving environment taking in non-essential information according to road conditions and whether there is sufficient 'spare capacity' to perform such tasks. Where external stimuli are present in demanding circumstances drivers tend to adopt a 'glance' strategy taking repeated short duration views of less than 1 second to either side of the vehicle's path but maintaining awareness of vehicle conditions.

The advertisement is positioned and designed to be readily visible and will attract attention without causing a dangerous distraction to drivers, pedestrians or cyclists. As the display is located on a gable wall it will also not cause any physical obstruction to vehicles or pedestrians.

The site is located on the western side of Finchley Road and the advertising will be directed towards southbound vehicular traffic as well as pedestrians.

The approach to the site is relatively straightforward and uncomplicated, meaning that the proposal can be readily assimilated without impacting on a driver's ability to control their vehicle and navigate through the area safely. The fact that the area is generally busy and that there is a lot of other visual stimulus will ensure that the advert is assimilated as part of the general context of the area rather than as a stand

out dominant feature.

The pre-application response advised that the applicant follow the Transport for London adopted "Guidance for Digital Roadside Advertising and Proposed Best Practice" (2012) in assessing the application. This guidance recommends screening sites for suitability according to road conditions and accident rates as well as suggesting proposed controls which could limit the potential for distraction. The applicant engaged Waterman Transportation to undertake an assessment of the site using the TfL endorsed approach of an Advertising Safety Guidance Form (ASGF). The completed form is submitted as part of this application and demonstrates that the site has a low risk for advertising.

In terms of operational controls, the proposal follows the guidance closely by setting a maximum level of luminance in line with the ILP Technical Note 5 and in limiting the display to static content with instant changeovers between adverts rather than slow merges. In terms of the frequency of change between adverts this has been set to 10 seconds in line with how the advertising will be sold. The guidance explains that this changeover should limit the potential for drivers to view multiple adverts on the approach, although it is accepted that it is impossible to get this below two adverts as there is always the potential to arrive at the point of changeover (as there was with traditional adverts). If the formula suggested in the guidance were to be applied in this instance, then the 10 second changeover would be appropriate. The advertisement would become readily visible on the approach from Finchley Road and College Crescent at about 120m distance. Travelling at 30mph this distance would take 8.9 seconds which would indicate that a ten second changeover is appropriate. Whilst the junction is signalled and traffic often moves slow through the area, the risk of accident is decreased at slower speeds and as such this is not a factor that should influence the changeover rate.

Taking into account the above, the proposal is considered to be appropriately located and appropriately controlled to ensure that driver and pedestrian safety is not compromised.

Conclusion

The application proposes to replace and upgrade an existing advertising located within a commercial centre. The site has already been deemed as appropriate for illuminated advertising by an appeal Inspector. The proposal will represent a significant investment in the site and will seek improvements to the site as a whole to make it more attractive, including cleaning the building and introducing a high quality lighting scheme. Overall it is considered that the scheme would serve to positively enhance the site.

When considering the individual merits of the proposed scheme and the particular circumstance of this site, the proposal is not harmful to amenity or public safety and does not conflict with adopted Council Policy nor its guidance on assessing large format advertising hoardings as set out in paragraphs 8.16 to 8.19 of CPG1.

For the reasons given above, it is considered that this is an appropriate proposal for this location and should therefore be granted consent.

Application Submission

In order to complete the application, please find attached the following documentation:

- Completed application forms prepared by Vision Sites;

- Cover letter prepared by Vision Sites (this letter);
- TFL Advertising Safety Guidance Form (ASGF) prepared by Watermans; and
- Full set of plans and elevations:
 - 2794_PP_01 (Rev A) Site Location Plan;
 - 2794_PP_02 (Rev A) Site Plan;
 - 2794_PP_03 (Rev A) A-A Elevation;
 - 2794_PP_04 (Rev A) B-B Elevation;
 - 2794_PP_05 Specification Sheet;
 - 2794_PP_06 Design Sheet;
 - 2794_PP_07 CGI.

Additionally, we will arrange payment to Camden Council for the sum of £385 to cover the cost of the Advertisement Consent application.

I trust that the above is clear and look forward to receiving notification that the application has been registered in due course. Should you have any queries in relation to any of the attached information, please do not hesitate to contact me.

Yours faithfully

A large black rectangular box used to redact the signature of Martin MacNamara.

Martin MacNamara
Managing Director

Appendix 1 – 2012 Appeal Decision (Ref: APP/X5210/H/12/2170846)