



**Date: 23/06/2016**  
**Our ref: 2016/2878/PRE**  
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Dear Mr Michael Doyle

115-121 Finchley Road, NW3 6HY

Thank you for submitting a pre-planning application enquiry for the above property with the required fee of £960.

### **1. Proposal**

The proposal is for the 'upgrade' of an existing internally illuminated advertising panel (4.5m x 3m), consented at appeal.

The proposed advertisement would be an illuminated digital media screen (6m x 3m) on which static images or motion video/animation would be displayed.

As part of the proposal, the flank elevation of 115-121 Finchley Road would be clad in weathering steel panelling.

### **2. Site description**

The hoarding would be positioned at first floor level, on the north-facing flank elevation of 115-121 Finchley Road; a busy area of mixed use, with high traffic and pedestrian flows.

The wall is adjacent to a large modern commercial building (Overground House).

The site is not within the setting of a listed building or conservation area.

### **3. Relevant planning history**

2011/6188/A - Retention of internally illuminated advertising panel measuring 4.5m high by 3m wide attached to the side elevation at first-floor level. Refuse advertisement consent and warn of prosecution to be taken 24/01/2016.

APP/X5210/H/12/2170846 – Retention of internally illuminated advertising panel measuring 4.5m high by 3m wide attached to the side elevation at first-floor level. Appeal allowed 01/08/2012.

#### 4. Relevant policies and guidance

##### **National Planning Policy Framework, 2016**

##### **The London Plan 2016**

##### **LDF Core Strategy:**

CS5 Managing the impact of growth and development

CS14 Promoting high quality places and conserving our heritage

CS17 Making Camden a safer place

##### **Camden Development Policies:**

DP17 Walking, cycling and public transport

DP21 Development connecting to the highway network

DP24 Securing high quality design

DP26 Managing the impact of development on occupiers and neighbours

##### **Supplementary Planning Guidance:**

CGP1 Design, chapter 3, 8 and 9, updated 2015

CPG6 Amenity, chapter 5, updated 2013

##### **Streetscape Design Manual, 2005**

##### **Planning enforcement initiative to remove unsightly advertisement hoardings in the borough - updated 2013**

#### 5. Assessment

The main issues are the effect of the proposed advertisement on amenity and public safety.

##### Public Safety

Advertisements will not be considered acceptable where they impact upon public safety, i.e. they are hazardous to vehicular traffic (block sight lines, emit glare) or pedestrian traffic (disrupt the free flow of pedestrian movement).

The proposed advertisement would be located in a busy area of mixed use, where there are traffic signals and signs, busy pedestrian footways and pedestrian crossings.

The Council's Transport Department have been consulted on the proposal. They consider that a motion advertisement in this location i.e. on the skyline and close to pedestrian crossings/traffic signals could be a harmful distraction to drivers.

As such the proposal would conflict with the aspirations of policy DP21 which states that works affecting highways should avoid causing harm to highway safety.

Since the previous application was allowed at appeal, TFL have produced a best practice guidance document on digital roadside advertising. Section 4 of this

document discusses potential conflict locations. It states that 'locations with tight geometry or major junctions, merges, diverges or pedestrian crossings and located in the urban environment would require detailed analysis'.

The guidance goes on to state that where potential conflicts may occur, an application should not be outright refused but should be reviewed further and undergo an assessment that will deem the proposal acceptable or not. Appendix A of TfL's guidance notes; "Advertising Safety Guidance Form – ASGF" includes an assessment criteria and application form that must be filled out to assist with this process.

TfL have also derived a formula that can determine the minimum time each advertisement is to be displayed. Paragraph 4.9 states that 'maximum sight distance to the digital advertisement (metres / speed limit (metres / sec) = minimum display duration (sec).' These details would need to be provided in order to determine the appropriate minimum display duration.

#### Amenity (aural and visual)

The NPPF states that poorly placed advertisement can have a negative impact on the appearance of the built environment. These policies are reflected in supplementary guidance CPG1 (Chapter 8).

The Council is committed to improving Camden's streets and public spaces and has carried out many improvement schemes with many more on-going and planned.

The Camden Streetscape Design Manual has been produced to raise the standard of street works throughout the borough. Section 4.13 covers advertising and publicity. The guidance states that 'street advertising should be kept to an absolute minimum in all locations'.

CPG1 states that 'good quality advertisements respect the architectural features of the host building and the character and appearance of the surrounding area'.

'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'.

Large, internally illuminated digital hoardings of this nature are not considered appropriate, particularly in highly prominent locations.

The proposed new advertisement would be prominently position and would be highly visible in long views from Finchley Road and from the junction with Avenue Road.

By virtue of its size and location the digital advertisement would appear over-bearing and dominate the immediate surroundings.

Although it is acknowledged that the host building itself is not of any particular architectural merit, the proposed hoarding would appear as an incongruous feature which is to the detriment of the wider street scene.

The wider streetscape currently suffers from visual clutter including public payphones, bus stops, bins, telecommunication cabinets, various traffic signs and advertisements. The proposed media screen would further exacerbate this.

### Cladding

It is proposed to clad the flank elevation of 115-121 Finchley Road in weathering steel panelling.

CPG1 states that 'the most satisfactory advertisements are those which take into account the character and design of the property, its surroundings and alter the external fabric of the building as little as possible'.

Although it is acknowledged that 115-121 Finchley Road is not of any particular architectural merit, however the proposed cladding is considered to be overly prominent and out of keeping with both the host building and the adjacent Overground House.

### Lighting

A 'soft' backlighting system is also proposed. Policy DP26 aims to ensure artificial light levels are controlled and managed. Poorly designed lighting can be damaging to the environment and result in visual nuisance.

In the absence of detailed plans, it is difficult to comment on the proposed backlight system. However, given that Overground House is in commercial use, the proposal is unlikely to harm the quality of life for those living nearby.

All light installations must be energy efficient and 'Dark Sky' compliant, thereby not causing obstructive light pollution, glare or spillage (by reference to the British Astronomical Association Campaign for Dark Skies).

Applicants are advised to follow the general principles taken from the Institution of Lighting Engineers, Guidance Notes for the Reduction of Obtrusive Light (2005):

- a) Lighting is to be directed downwards wherever possible to illuminate its target. If there is no alternative to up lighting, then the use of shields will help reduce the spill of light to a minimum. Up lighting is a particularly bad form of obtrusive light and contributes to sky glow.
- b) Lighting is to be designed to minimise the spread of light near to, or above, the horizontal. Again, any light that shines above the horizontal line of the light adds to the sky glow effect.
- c) Lighting should be designed to the correct standard for the task. Over-lighting is a cause of obtrusive light and also represents a waste of money and energy.

- d) The main beam angle of all lights proposed directed towards any potential observer is to be kept below 70°. It should be noted that the higher the mounting height, the lower the main beam angle could be. This will help reduce the effect of glare and light spill on neighbouring dwellings, passing motorists, pedestrians, etc.
- e) Lighting should be directed to minimise and preferably avoid light spillage onto neighbouring properties. Wherever possible use floodlights with asymmetric beams that permit the front glazing to be kept at, or near parallel to, the surface being lit.
- f) The lights used should be the most efficient taking into account cost, energy use, and the purpose of the lighting scheme required. All lighting schemes should meet British Standards.

## 6. Conclusions

In summary the Council's would raise the following concerns regarding the proposal:

- The Council's Transport Department consider that a motion advertisement in this location could distract drivers and prove detrimental to the safety of highways.
- The proposed advertisement would be unacceptably harmful to visual amenity.
- The steel cladding would alter the external fabric of the building and is considered overly prominent and out of keeping with the host building and the adjacent Overground House.
- Amenity issues will further be explored on a site visit/at the formal application stage, however given that Overground House is in commercial use, the proposed backlighting is unlikely to harm the quality of life for those living nearby.

## 7. Supporting information

Given the above advice and concerns raised the Council could not support the proposal. However if you are minded to submit an application the following information should be submitted as part of any future planning application.

- Please ensure that you submit all the required information in accordance with the validation checklist, details of which can be obtained from the Council's website:  
<http://www.camden.gov.uk/ccm/navigation/environment/planning-and-built-environment/planning-applications/making-an-application/supporting-documentation--requirements-/>
- Appendix A of TfL's guidance notes; "Advertising Safety Guidance Form – ASGF" includes an assessment criteria and application form that must be filled out to assist with this process.
- TfL have derived a formula that can determine the minimum time each advertisement is to be displayed. These details would need to be provided in order to determine the appropriate minimum display duration.
- Any future planning application for security lighting should be accompanied by the following information:
  - The design of lighting infrastructure;

- A plan or plans showing layout of the lighting including orientation of the beams of light;
- Lighting levels, lumen details, lamp type, wattage;
- Control systems including types and location of sensors, times lighting will be on;
- The need for lighting, that is, an explanation of what activity the lighting is supporting i.e. to increase on site security; reducing the opportunity for criminal activity and increasing the opportunity for natural surveillance.

**This document represents an initial informal officer view of your proposals based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.**

Please note that the comments on amenity do not represent a full assessment of the amenity impacts on the development. Amenity issues will further be explored on a site visit. As such these comments may be altered during the formal application.

If you have any queries about the above letter or the attached document please do not hesitate to contact Anna Roe on 020 7974 1226.

Thank you for using Camden's pre-application advice service.

Yours sincerely,

Anna Roe

BA (Hon) MSc  
Planning Officer  
Planning Solutions Team

