



SEPTEMBER
2016

Appeal Statement

Land at St Giles Circus,
126-136 Charing Cross Road,
London WC2H 8NJ

Iceni Projects Limited on behalf of
Outdoor Plus Limited

September 2016

Iceni ref. 15/389

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ON BEHALF OF OUTDOOR
PLUS LIMITED

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Appeal Statement
LAND AT ST GILES CIRCUS,

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1. INTRODUCTION

1.1 This Appeal Statement supports an appeal against the decision made by the London Borough of Camden (the "Council" or "LPA"), under delegated powers on 11 August 2015, to refuse express advertisement consent (LPA ref. 2016/2888/A) for Land at St Giles Circus, 126-136 Charing Cross Road, London WC2H 8NJ (the "Appeal Site"). This appeal is submitted on behalf of Outdoor Plus Ltd (the "Applicant") and developers Consolidated Developments Ltd.

1.2 The application which is the subject of this appeal sought express consent for:

Temporary display of internally illuminated LED display board signage (measuring 3m in height by 12m in width and 0.6m in depth) to Andrew Borde Street and Charing Cross Road elevation from 01/09/2016 to 23/05/2018.

1.3 This application was refused for two reasons, these relating to amenity and public safety.

1.4 The application for advertisement consent was submitted in the context of significant redevelopment proposals for the wider St Giles Circus site, which were granted on 31 March 2015 and have since been implemented. The relevant planning permission grant approval for the following development:

"The erection of three buildings (5 and 7 storey buildings facing Centre Point Tower and a 4 storey building on Denmark Place), to provide 2895sqm of basement Event Gallery space, exhibitions, product launches, live music (including recorded music), awards ceremonies, conferences and fashion shows (Sui Generis), urban gallery, retail, advertising, exhibitions, brand and product launches, corporate events, screenings, exhibitions and events, flexible retails and restaurant floorspace, drinking establishment (Class A4) and a 14 bedroom hotel (Class C1) between Denmark Place and Andrew Borde Street."

1.5 The associated advertisement consent (ref.2012/6863/A) was for:

"Installation of 1912sqm of internally illuminated intermittent digital LED display to the internal walls, ceiling and floor of the urban gallery in connection with the redevelopment of St Giles Circus site."

1.6 This permanent "urban gallery" would be installed once the redevelopment of St Giles Circus is complete.

1.7 While the site is under construction, the intention was to erect a shroud advert with commercial advert inset (LPA ref. 2016/0522/A). However, this style of advert requires a lot of space within the compound for the supporting scaffolding structure and it is not possible to sacrifice this space for 8-

9 months of the construction programme. Hence why a smaller temporary advert in a display board style (the Appeal Scheme), to be erected above the hoarding, was proposed.

- 1.8 From the outset it should be noted that the Appeal Scheme is significantly smaller than both the temporary shroud scheme (LPA ref. 2016/0522/A) and permanent urban gallery (LPA ref. 2012/6858/P), both of which was granted by the LPA.
- 1.9 The Appeal Scheme would be linked to the wider redevelopment proposals have evolved to build on the developer's (Consolidated Developments Ltd's) track record of supporting music and local retailers with significant improvements proposed to both the shops and the public realm, ensuring that this area continues to be at the heart of the British music scene. Denmark Place which is currently an unattractive and underused back alley, would be re-invigorated to tap into this music heritage and help ensure the on-going vitality of this specialist retail area. This advert would include commercial content but would also offer the opportunity for local traders to draw people from Tottenham Court Road station down towards Denmark Street, reminding people that the businesses are very much still open for trade.
- 1.10 The purpose of this Appeal Statement is to identify and address the main planning issues associated with the proposed development in order to demonstrate how the proposal would be acceptable in the context of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (as amended) ('the Regulations'), Planning (Listed Buildings and Conservation Areas) Act 1990 and Development Plan (DP) and other material planning considerations, as necessary.
- 1.11 The statement is structured as follows:
 - Section 2 describes the application site and its surroundings;
 - Section 3 outlines the planning history;
 - Section 4 describes the Appeal Scheme;
 - Section 5 identifies the planning policies relevant to the determination of the appeal;
 - Sections 6 addresses each reason for refusal against the relevant policy and legislative framework, in terms of amenity and public safety; and
 - Section 7 concludes that the appeal should be allowed.
- 1.12 Appendices to this statement comprise:
 - Appendix A.1 – Map identifying Heritage Assets.

- Appendix A.2 – Photographic Study.
- Appendix A.3 – Advertisement consent ref. 2016/0522/A.
- Appendix A.4 – Advertisement consent ref. 2014/6754/A.
- Appendix A.5 – Urban Gallery Application Extract ref. 2012/6853/A.
- Appendix A.6 – Listed Building Description Centre Point.
- Appendix A.7 – Listed Building Description 20 Denmark Street.

2. SITE AND SURROUNDINGS

- 2.1 The Appeal Site forms part of the approved St Giles Circus redevelopment site. The development site consists of 4 core areas, these being the area to the north of Denmark Place, the area lying between Denmark Place and Denmark Street north, properties to the south of Denmark Street and 71 Endell Street. The proposed advertisement would be located on the area to the north of Denmark Place.
- 2.2 As noted by the Denmark Place Planning Brief (adopted July 2004), the main site lies at the very heart of the west end of London. Immediately to the north sits an important crossroads of some of the West ends busiest streets – Oxford Street, New Oxford Street, Tottenham Court Road, Charing Cross Road, although it is relevant to note that the road network in the vicinity of the site is under temporary alignment and will not be fixed until the wider development is completed.
- 2.3 St Giles Circus is also a strategically important pedestrian hub, lying as it does at the heart of some of London's most popular visitor attractions, including Tottenham Court Road, Bloomsbury and the British Museum to the north, Holborn to the east, Covent Garden, Shaftesbury Avenue and London's Theatreland to the south east and south, and Soho and Oxford Street to the west.
- 2.4 With the advent of Crossrail and other significant developments in the area the importance of St Giles Circus as a pedestrian hub will increase even further, making this a key gateway site for this area of Central London
- 2.5 The Appeal Site is in Denmark Street Conservation Area and the advertisement would be in the setting of Grade II Centre Point Tower and Centre Point Flats to the north and east and 20 Denmark Street, albeit all of these buildings are currently undergoing works of redevelopment There are also a number of non-designated heritage assets within the setting of the Appeal Scheme. The heritage assets are identified on an extract from Denmark Street Conservation Area Appraisal, see **Appendix A.1**.
- 2.6 The Appeal Site is in Central London Area (CLA), the Tottenham Court Road Opportunity Area as designated by the London Plan and is identified by Core Strategy Policy CS2 as a Growth Area. The wider redevelopment site is also allocated, in the Site Allocations DPD.
- 2.7 The St Giles Circus is currently under construction – photographs of the site and its surroundings are included at **Appendix A.2**.

3. PLANNING HISTORY

- 3.1 The site forms part of the St Giles Circus redevelopment, which has a long history. The relevant applications in relation to the Appeal Scheme are outlined in Table 3.1.

Table 3.1 Relevant Planning history

Ref.	Description	Decision	Date
2016/2888/A	Temporary display of internally illuminated LED display board signage (measuring 3m in height by 12m in with and 0.6m in depth) to Andrew Borde Street and Charing Cross Road elevation from 01/09/2016 to 23/05/2018.	Refused (appeal lodged)	11 August 2016
2016/0522/A	Temporary display of a shroud with 1 x non-illuminated advertisement to Charing Cross Road and Andrew Borde Street elevations from 01/04/2016 to 01/04/2018.	Granted	4 April 2016
2014/6754/A	Temporary display of a shroud with 1 x non-illuminated advertisement to Charing Cross Road and Andrew Borde Street elevations and display of a shroud with 1 x non-illuminated advertisement to St Giles High Street and Denmark Street elevations from 01/01/2015 to 01/01/2017.	Granted	24 April 2015
2012/6863/A	Installation of 1912sqm of internally illuminated intermittent digital LED display to the internal walls, ceiling and floor of the urban gallery in connection with the redevelopment of St Giles Site	Granted	31 March 2015
2012/6858/P	Redevelopment involving the erection of three buildings (5 and 7 storey buildings facing Centre Point Tower and a 4 storey building on Denmark Place), to provide 2895sqm of basement Event Gallery space, exhibitions, product launches, live music (including recorded music), awards ceremonies, conferences and fashion shows (Sui Generis), urban gallery, retail, advertising, exhibitions, brand and product launches, corporate events, screenings, exhibitions and events, flexible retails and restaurant floorspace, drinking establishment (Class A4) and a 14 bedroom hotel (Class C1) between Denmark Place and Andrew Borde Street.	Granted	31 March 2015

- 3.2 For ease of reference the application documents for the previous advertisement schemes can be found at **Appendices A.3 and A.5**.
- 3.3 Also relevant to the determination of this appeal, is the urban gallery (an interactive and illuminated digital surface) providing 1,912 sqm of advertisement space, which was consented under planning permission ref. 2012/6858/P. See **Appendix A.5**. for relevant extracts of the submission documents, including plans and road safety audit which are referred to again at Section 6 of this Appeal Statement.

4. THE APPEAL SCHEME

- 4.1 The Appeal Scheme seeks express advertisement consent for the display of a LED internally illuminated digital advertisement, affixed/located above hoarding boards surrounding the St Giles Circus construction site.
- 4.2 The Developer's original intention was to erect a shroud advert with commercial advert inset (LPA ref. 2016/0522/A). However, this style of advert requires a lot of space within the compound for the supporting scaffolding structure and it is not possible to sacrifice this space for 8-9 months of the construction programme.
- 4.3 Taking into consideration the sequencing of the redevelopment works, the Appeal Scheme was prepared and sought consent for a smaller standalone temporary advertisement, as follows:

Temporary display of internally illuminated LED display board signage (measuring 3m in height by 12m in width and 0.6m in depth) to Andrew Borde Street and Charing Cross Road elevation from 01/09/2016 to 23/05/2018.

- 4.4 This scheme proposes to replace the advertisement reference 2016/0522/A measuring 18m x 9m (not yet built) granted consent from 1 April 2016 until 1 April 2018, with a billboard of traditional proportions of 12m x 3m. The advert would be one-sided facing north towards Andrew Borde Road and Tottenham Court Road station.
- 4.5 The Appeal Scheme represents a significant reduction in advertising area from 162 sqm (LPA ref. 2016/0522/A) to 36 sqm. In fact this is a 77% decrease compared to the display area which has recently been approved.
- 4.6 The advertisement would be an illuminated LED screen with images changing once every 10 seconds, all to be controlled via planning condition. Illuminance would be at 300 cd/m.

5. RELEVANT PLANNING POLICY AND LEGISLATION

- 5.1 This Section outlines the main planning policies and legislation, relevant to the determination of this Appeal.

Planning (Listed Buildings and Conservation Areas) Act 1990

- 5.2 Section 66 of the Act establishes a general duty for a local planning authority (LPA), in considering whether to grant consent for a development which affects a listed building, to have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historical interest which it possesses. A building is listed by virtue of its special architectural or historical interest (Section 1(1)).
- 5.3 Section 72 of the Act establishes a duty in the exercise of any function under the Act to pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area.

National Planning Policy Framework (NPPF) (2012), National Planning Practice Guidance (NPPG) (2014), and Town and Country Planning (Control of Advertisements) (England) Regulations 2007, as amended ('the Regulations')

- 5.4 Section 12 of the NPPF deals with the consideration of cultural heritage assets and sets out the importance of being able to assess the impact of a development on the significance of heritage assets. Significance is defined in Annex 2 as the value of an asset because of its heritage interest. This interest may be archaeological, architectural, artistic or historic and can extend to its setting. The setting of a heritage asset is defined in Annex 2 as the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve.
- 5.5 A designated heritage asset is recognised by the NPPF to be a World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.
- 5.6 With regard to designated assets, Paragraph 132 states that the more important the asset, the greater the weight should be on its conservation. Distinction is drawn between those assets of highest significance and those of a lesser significance.
- 5.7 The NPPF also identifies at Paragraph 132 harm as being either substantial or less than substantial. In cases where less than substantial harm to the significance of a designated asset is anticipated,

- 5.8 Paragraph 134 requires that this harm should be weighed against the public benefits of the proposal. In respect of non-designated assets, Paragraph 135 requires a balanced judgement having regard to the scale of any harm or loss and the significance of the asset.
- 5.9 In accordance with the NPPF, this statement sets out the significance of heritage assets likely to be affected by the proposed works. The information provided in this assessment conforms to Paragraph 128 of the NPPF, thus the level of detail provided is proportionate to the significance of the affected heritage assets and no more than is sufficient to understand the potential impact of the proposal on that significance.

Advertisement Control

- 5.10 Current national guidance for advertisement control is set out in the NPPF (Paragraph 67 and 68), which recognises that the control over outdoor advertisements should be efficient, effective and simple in concept and operation.
- 5.11 The NPPF clarifies at Paragraph 67 that the display of outdoor advertisements can only be controlled in the interests of “amenity” and “public safety”, taking account of cumulative impacts, as guided by the Town and Country Planning (Control of Advertisements) (England) Regulations 2007, as amended (‘the Regulations’).
- 5.12 The NPPG provides further interpretation of the Regulations; it replaces Circular 03/2007 in this regard. The Regulations repeat the provisions in the NPPF adding that the development plan may be taken account as a material consideration, although it cannot override the two principal issues.
- 5.13 The 2007 Regulations states that factors relevant to amenity include the general characteristics of the locality, including the presence of any features of historic, architectural, cultural or similar interest. The NPPG, on amenity, states at Paragraph 79, that:

“‘Amenity’ is not defined exhaustively in the Town and Country Planning (Control of Advertisements) (England) Regulations 2007. It includes aural and visual amenity (regulation 2(1)) and factors relevant to amenity include the general characteristics of the locality, including the presence of any feature of historic, architectural, cultural or similar interest (regulation 3(2)(a))”,

“In practice, ‘amenity’ is usually understood to mean the effect on visual amenity in the immediate neighbourhood of an advertisement or site for the display of advertisements, where residents or passers-by will be aware of the advertisement.”

- 5.14 In terms of ‘amenity’ the LPA is required to consider the effect of the proposals on the appearance on the building or on the visual amenity in the surrounding area (including the cumulative impact of

multiple advertisements in the surrounding area and the brightness of any proposed illuminations). Heritage assessment is a necessary part of considering visual amenity.

- 5.15 In considering visual amenity, the LPA should consider the impacts as well as the benefits associated with the advertisement proposals. The proposals are related to special temporary circumstances, when the visual amenity of this site is significantly reduced when compared to the past and future situations with the majority of the immediate area acting as a building site - and where the proposals offer a benefit to the setting of heritage assets.
- 5.16 When considering 'public safety' the LPA are advised to have consideration to the effect the signage has upon the safe use and operation of any form of traffic and transport (particularly the potential to distract drivers, cyclists and pedestrians).

Historic England Guidance

The Setting of Heritage Assets (2012 Revision)

- 5.17 (Paragraph 2.2) Setting does not have a fixed boundary and cannot be definitively and permanently described as a spatially bounded area or as lying within a set distance of a heritage asset. Views on what comprises a heritage asset's setting may change as the asset and its surroundings evolve, or as the asset becomes better understood.
- 5.18 (Paragraph 2.4) Setting is not a heritage asset, nor a heritage designation. Its importance lies in what it contributes to the significance of the heritage asset. This depends on a wide range of physical elements within, as well as perceptual and associational attributes, pertaining to the heritage asset's surroundings. Each of these elements may make a positive or negative contribution to the significance of the asset, or be neutral. In some instances, the contribution made by setting to the asset's significance may be negligible: in others it may make the greatest contribution to significance.

Conservation Principles (2008)

- 5.19 Conservation Principles (English Heritage, 2008) advises that the 'definition of the setting of a significant place will normally be guided by the extent to which material change within it could affect (enhance or diminish) the place's significance'.

Local/Regional Planning Policy

- 5.20 The development plan consists of:
- The London Plan (2016), as amended;
 - Camden Core Strategy (adopted 2010);

- Development Policies Development Plan Document (“DPD”) (adopted 2010);
- Site Allocations DPD (adopted 2013); and
- Emerging Local Plan (Examination in Public 2016).

Camden Core Strategy

- Policy CS5 (Managing the impact of growth);
- Policy CS14 (Promoting high quality places and conserving our heritage); and
- Policy CS17 (Making Camden a safer place).

Development Policies

- Policy DP17 (Walking, cycling and public transport);
- Policy DP21 (Development connecting to the highway network);
- Policy DP24 (Securing high quality design);
- Policy DP25 (Conserving Camden’s Heritage); and
- Policy DP26 (Managing the impact of development on occupiers and neighbours).

Emerging Camden Local Plan

- Policy D1 (Design);
- Policy D2 (Heritage); and
- Policy D4 (Advertisements).

Camden Planning Guidance 2015 (as amended)

- CPG1 (Design) Chapter 8.

Denmark Street Conservation Area (Designated June 1991)

6. ADVERTISEMENT ASSESSMENT

- 6.1 This section addresses the “amenity” and “public safety” tests, outlined in the Town and Country Planning (Control of Advertisement) (England) Regulations 2007, as amended, and relevant development plan policies.
- 6.2 In considering the Appeal Scheme it is important to bear in mind the baseline of extant consents as well as the current setting within which the proposals will be read:
- Non-illuminated large shroud with inset commercial advertisement (LPA ref. 2016/0522/A);
 - Non-illuminated shroud with inset commercial advertisement (LPA ref. 2014/6754/A);
 - Interactive and illuminated digital surface, which would form an urban gallery providing 1,912 sqm of advertisement space (LPA ref. 2012/6853/A);
 - Significant area of demolition where the majority of heritage assets are shrouded and the surrounding area is used as a temporary building/works site.
- 6.3 For ease of reference, the relevant plans and documentation in relation to these two consents is provided at **Appendices A.3 and A.5.**, respectively.

Refusal Reason 1

- 6.4 The first reason for refusal states:

The proposed digital sign, by reason of its size, siting and method of illumination would result in an overly dominant addition which would be highly detrimental to the appearance and character of the streetscape and adjoining station building and would fail to preserve or enhance the character or appearance of the Camden Town Conservation Area contrary to Core Strategy Policies CS5 (Managing the impact of growth) and CS14 (Promoting high quality places and conserving our heritage) and Development Policies DP24 (Securing high quality design), DP25 (Conserving Camden's Heritage) and DP26 (Managing the impact of development on occupiers and neighbours) of Camden's Local Development Framework and paragraphs 14, 17, 56 -67, 126 -141 of the National Planning Policy Framework.

- 6.5 Firstly, in considering this refusal reasons it should be noted that the Council have referred to the wrong conservation area and listed building on the decision notice, it is assumed, therefore, that the heritage assets which could be temporarily impacted by the advertisement would be Denmark Street Conservation Area, and Grade II listed Centre Point and 20 Denmark Street.

6.6 There are three key considerations to appreciate when considering the acceptability of the Appeal Scheme:

- The extant advertisement consents, as stated above.
- The surroundings are currently a building site with significant levels of approved demolition, hoarding, and listed buildings covered in shrouds, see **Appendix A.1**.
- The site is in London Zone One in a busy commercial area with 24-hour tube is running and night time economy is important, where temporary advertisements of this nature would be appropriate.

6.7 The Developers of the site are committed to the redevelopment of St Giles Circus and the appearance of the area during construction for the benefits of their tenants, the condition of the site, its impact on neighbours, impressions of tourists and the general appearance in the streetscene.

6.8 Firstly, in considering the rationale for the advertisement and its impact, it is important to consider the 'do nothing' scenario. This would entail hoarding, erected under permitted development rights, adorning the host building and negatively impacting on the streetscene. It would also negatively impact upon the setting of adjacent listed buildings and the character and appearance of the conservation area.

Scale

6.9 The position of the inset commercial content on the building has been carefully considered to ensure that it would visually integrate with its setting. The advertisement is significantly smaller than those previously approved, given that it is illuminated and without a shroud.

6.10 In the context of the site's setting, the scale of the temporary advertisement is appropriate and would not be harmful to the conservation area or setting of listed buildings.

Visual Appearance

6.11 As noted above, this area is undergoing significant change and as such the visual appearance of the surrounding area is not as it was prior to works beginning, nor is like the future situation when works are completed. The erection of the proposed advertisement would help create vitality and interest into the street scene in an area which would otherwise offer limited attraction in place of a capital city destination. There is anecdotal evidence to suggest that people enjoy advertisement installations and that they can be positive additions to the street scene.

6.12 This advert would include commercial content and may also be utilised by local traders, drawing people from Tottenham Court Road station down towards Denmark Street, reminding people that the businesses are very much still open for trade despite the construction works taking place in the area. This would link the advert to the wider redevelopment proposals which have evolved to build

on the developer's (Consolidated Developments Ltd) track record of supporting music and local retailers with significant improvements proposed to both the local shops and the public realm, ensuring that this area continues to be at the heart of the British music scene. Denmark Place which is currently occupied as part of the building site will be re-invigorated as part of the wider redevelopment proposals.

- 6.13 As required by Policy DP24, the advert has been designed to be of a high quality, with a lightweight framed structure, which would be sensitive to its visual appearance of the streetscene.
- 6.14 It is key to note that the character and appearance of this part of the Denmark Street Conservation Area, as detailed within the 2010 Conservation Area Appraisal, is now outdated as the area is in transition with the majority of the surrounding streetscape being demolished to be used as a construction site for the wider redevelopment of the area. As such it is considered the existing, temporary nature of the area would be enhanced by the proposals through the creation of some interest within the streetscene acting as a foil to the extensive building works. In this context, the proposal would preserve the character and appearance of the conservation area.
- 6.15 Likewise the Centre Point (Grade II listed building) within the setting of the site, is also under construction and is heavily shrouded. This temporary advertisement would therefore preserve the setting of the listed building and would have negligible harm.
- 6.16 The advertisement would create an atmosphere of colour, variety and interest, and thus make a positive contribution to the visual environment, and amenity of the area, during the course of the building works.

Illumination

- 6.17 The illumination of the advert would be internal LED and illuminance would be set at a reasonable 300 cd/m level. The level of illumination and hours of use, are normally controlled by condition. In considering the acceptability of illumination, we note that the "urban gallery" a significantly larger development included illumination and this Appal Scheme is only temporary in nature.
- 6.18 There would be no visual intrusion by virtue of light pollution into adjoining residential properties, as required by Development Policies DP24 (Securing high quality design), DP25 (Conserving Camden's Heritage) and DP26 (Managing the impact of development on occupiers and neighbours).

Cumulative Impact

- 6.19 The immediate vicinity has a strongly commercial character and the proposal would be read in the context of the streetscene. Following a recent site assessment, whilst the Grade II listed Centre Point is currently shrouded, this does not comprise commercial content advertising space. This is considered to be a scheme benefit.

- 6.20 Furthermore, it is noted that the Advertising Standards Authority is the regulatory body responsible for ensuring acceptable standards are maintained in the form and content of advertisements. In this regard, the content of future commercial content would be appropriate and subject to scrutiny. We also note that our client would undertake regular policing of the site hoarding, and future installations and content.
- 6.21 Therefore, the proposals would not result in a proliferation of signage to the detriment of the visual appearance of the area, as required by Paragraph 67 of the NPPF.

Refusal Reason 2

- 6.22 The second reason for refusal states:

The proposed digital sign, by reason of its size, siting and method of illumination close to a road and busy junction, would be likely to distract driver's attention on the approach to Borde Street to the detriment of highway and pedestrian safety, contrary to Development Policies DP21 (Development connecting to the highway network) of Camden's Local Development Framework and paragraphs 14, 17, 56 -67, 126 -141 of the National Planning Policy Framework.

- 6.23 The key point here is the road alignment – Andrew Borde Street is now closed to vehicular traffic and will not reopen to vehicles (beyond construction vehicles). Charing Cross Road is currently one way with only north bound traffic so no vehicles would be driving towards the advert. By the time Charing Cross Road is reinstated, as two-way, the redevelopment of St Giles Circus would be completed and the advert removed.
- 6.24 The Safety Audit prepared in support of the urban gallery consent can also be read in support of this application, see **Appendix A.5**. It is unclear how the consent for the permanent urban gallery could be acceptable and the Appeal Scheme not, when the permanent scheme is significantly larger.
- 6.25 As required by the NPPF, NPPG and Policy DP2; the proposal would not:
- obstruct or impair sight-lines at corners, bends or at a junction, or at any point of access to a highway;
 - because of their size or siting, cause obstruct or confuse a road-user's view, or reduce the clarity or effectiveness of a traffic sign or signal, or would be likely to distract road-users because of their unusual nature. Notably because the shroud incorporates a 1:1 image of the host building and the hoarding is at ground level, not impacting on clarity or effectiveness of a traffic sign or signal;

- leave insufficient clearance above any part of a highway because the shroud would be attached above the scaffolding gantry and would not project;
- include external illumination that would be flashing, be a colour which could be confused with traffic signals/authorised signals, or because of their size or brightness, could result in glare and dazzle, or distract road-users.

6.26 For these reasons, it is therefore considered that the proposal would not create a hazard to highway safety and complies with the NPPF, and the design advice set out in the adopted Development Management Plan.

7. CONCLUSION

7.1 In summary:

- the advertisement is only temporary in nature, with consent being sought up to May 2018 to coincide with the completion of the wider redevelopment proposals;
- the previous shroud advert with commercial advert inset (LPA ref. 2016/0522/A) cannot be maintained throughout the construction programme because of the space that would be needed for the development of the site;
- the advertisement is of an appropriate height and scale, and is significantly smaller than both the temporary shroud scheme (LPA ref. 2016/0522/A) and permanent urban gallery (LPA ref. 2012/6863/A);
- the illumination is suitable for the commercial character of the area and is normally controlled by condition in any event;
- the alternative is a blank hoarded site, which would detract from the heritage assets and streetscene and provide no announcement or signposting to the music and local retailers on Denmark Street;
- the impact on character and appearance of the Denmark Street Conservation Area is minor and temporary, when considered in the content of the St Giles Circus and Tottenham Court Road redevelopment works;
- impact on the setting of the Grade II statutory listed Centre Point is minor and temporary;
- impact on the setting of the Grade II statutory listed 20 Denmark Street is negligible given the construction works that are taking place and that the building's significance lies mainly in its frontage to Denmark Street.

7.2 As the proposals accord with Regulation 3, the Development Plan and other relevant factors, expressed advertisement consent should be granted.

A1. MAP IDENTIFYING HERITAGE ASSETS

A2. PHOTOGRAPHIC STUDY

A3. ADVERTISEMENT CONSENT REF. 2016/0522/A

A4. ADVERTISEMENT CONSENT REF. 2014/6754/A

A5. URBAN GALLERY APPLICATION EXTRACT REF. 2012/6853/A

A6. LISTED BUILDING DESCRIPTION – CENTRE POINT

Name: CENTRE POINT

- List entry Number: 1113172
- 5-24, ST GILES HIGH STREET
CENTRE POINT, 101 AND 103, NEW OXFORD STREET
CENTRE POINT, CHARING CROSS ROAD
- The building may lie within the boundary of more than one authority.
- County: Greater London Authority
- District: Camden
- District Type: London Borough
- Parish: Non Civil Parish
- National Park: Not applicable to this List entry.
- Grade: II
- Date first listed: 24-Nov-1995
- Date of most recent amendment: 26-Apr-2013
- This list entry does not comprise part of an Asset Grouping. Asset Groupings are not part of the official record but are added later for information.

List Entry Description

Summary of Building

Offices, flats and shops complex built 1961-66. Designed by Richard Seifert and Partners for the developer Harry Hyams; leading design partner George Marsh. Ground floor of tower remodelled 2000.

Reasons for Designation

Centre Point is designated for the following principal reasons:

- * Architectural interest: the slender tower, with its delicately modelled surfaces, carried on the very visible pilotis, is one of the most distinctive high-rise compositions of the 1960s and a major London landmark. Attention is given to detail in the way the brise-soleil expresses the width of the link on the other side. The link provides an elegant transition between the high and low-rise elements, its huge expanse of glazing forming a dramatic contrast with the lively rhythm of the tower elevation. The east block, while of less intrinsic design merit, nonetheless forms a key component of the ensemble and is integral to Centre Point's planning interest. Its brise-soleil, expressing the office tier, is again a distinctive use of this feature, forming a strong, horizontal continuum with the glazed link
- * Planning interest: the relationship of tower, link and east block is a notable instance of Le Corbusier-inspired planning in London. The combination of, and contrast between, these elements is thus of note, not just the principal tower
- * Technological innovation: for the ingenious use of pre-cast panels, which were hung from the frame without the use of scaffolding: the first tall building in London to be constructed this way, and for the link block, a very early use in Britain of armour-plate glazing with metal fixings
- * Interiors: while the majority of the office, retail and residential interiors lack special interest, the tower, link and east block do each possess specific interiors of note which are specified in Details;
- * Historic interest: . Centre Point, now seen as a symbol of 1960s 'swinging London', is one of the most important speculative developments of its period in Britain, the most notable work of Seifert and Partners, one of the most prolific commercial practices of its day, and an early mixed-use development. The inclusion of shops, and especially housing, was a response to preserving these uses at a time when central London was becoming saturated with new offices

History

St Giles's Circus, one of London's most congested intersections by the 1950s, was earmarked for redevelopment by the London County Council (LCC) for the creation of a gyratory system. In March 1957, Hubert Bennett, the new LCC Chief Architect, produced a design for an 18-storey building, with nine and eleven-storey blocks to the east to rehouse the people living on the site. Legal disputes between the LCC and landowners over compensation were circumvented by Harry Hyams' Oldham Estates Co, which purchased the land as a speculative undertaking whereby the LCC would receive the land required for road widening in exchange for a higher development than would normally allowed under the LCC's 'plot ratio' regulations. Hyams engaged Richard Seifert and Partners as his architects. Seifert's leading design partner was George Marsh, who had previously worked for Burnet, Tait and Partners. In November 1959 an application for a 29-storey office block, with an 8-storey block of shops and flats, linked by a bridge over a gyratory, received outline planning permission from Camden Council, and designs for a 31-storey curtain-wall tower with a lozenge-shaped plan, closely resembling the Pirelli Tower, Milan (1955-60 by Gio Ponti, Pier Luigi Nervi and others), were drawn up. Further modifications were required due to the LCC's demand for wider

roads, and Seifert negotiated a reduction in the tower's footprint in return for two more storeys, plus an extra storey on the link; the lower block was subsequently widened. Work began on the lower block in 1961. A revised application for the tower received planning permission in January 1963, and the scheme was completed in 1966. The pond and fountains in the open area to the front of the tower, designed by the German émigré artist Jupp Dernbach-Mayen (1908-1990) were removed in 2009 as part of the Crossrail development.

Centre Point received limited but mainly enthusiastic reception. The design of the tower, which shows a deliberate move from the smooth regularity of International Modernism towards a more inventive, sculptural approach with strong contrasts between light and shade, was admired at the time and since for its confidence and originality. It rapidly becoming a symbol of the sixties: Ernő Goldfinger dubbed it 'London's first pop art skyscraper while Building (24 May 1968) enthused that 'like the Beatles and Mary Quant, this building expresses the supreme confidence of sheer professionalism... more than any other building Centre Point made London swing, it backed Britain, a product of real team work which must figure as an invisible export.' By 1966 however the market was saturated with new offices and Hyams, who had assigned the freehold to the LCC in return for a 150-year lease at low rent, chose to hold on to his portfolio until he could get a better price. Centre Point, including all the flats, thus gained notoriety for standing empty for many years at a time of housing shortage. It was not unique in this respect, but it was the most prominent empty high-rise and came to symbolise 1960s speculative greed. It has been more fully occupied since 1987 when it was sold and refurbished. In 2000 the area at the base of the tower was adapted to create a new entrance hall.

Details

A6.1 MATERIALS: reinforced pre-cast concrete. Tower clad in polished Capstone pre-cast concrete mullions. Armour-plate curtain-wall glazing to link block. Rear block faced in panels of grey glass. Polished 'blue pearl' granite to part of ground floor. Metal-framed windows throughout, some replaced.

PLAN: Centre Point consists of three elements: a 33-storey tower to the west; a 9-storey rectangular block to the east, aligned north-south, comprising a former bank, shops and pub at ground floor; offices at first and second, and maisonettes above (Centre Point House), and a link over St Giles High Street connecting the two blocks at first-floor level.

EXTERIOR

TOWER: slender tower with slightly convex faces; the narrow side elevations are recessed at the centre with slightly canted projections on either side. An open-tread concrete staircase leads from the left of the west elevation up to a projecting platform to the original entrance (similar stair on E elevation of tower). First floor is double height and carried on a base in the form of a zig-zag valance. To left of west elevation is a vertical concrete 'brise-soleil' with hexagonal terminations to top and

bottom, expressing the junction with the link block. The tower has pre-cast external faceted mullions in the form of 'H' turned on its side, which are partially load bearing and decrease in depth from bottom to top. This shape allowed the reinforcement of each unit to be bolted to that of the one above from within the building, which had to be erected without scaffolding due to space restrictions, and also enabled rainwater to be thrown clear of the structure without use of flashings. Thermal expansion joints are expressed between each mullion. Above the top storey is an open viewing gallery with the words 'CENTRE POINT' in neon-lit capital letters running along either side; these are a later addition. Above is a zig-zag cornice which projects to the building edge and has a faceted edge, picking up the rhythm of the structural frame below. The tower is supported on distinctive paired 'wasp-waisted' pilotis, eight in number. These are slightly faceted and clad in grey glazed mosaic tiles; those to upper facet in contrasting darker mottled grey.

LINK: this is supported on mosaic-clad pilotis to either side of the roadway. The underside has the exposed soffit of the inner staircase. Full-height armour-plate glazed curtain walls to both levels with steel patch-plates at intersections. The set-back clerestory has a very shallow pitched central apex.

EAST BLOCK: former bank at N end with original frontage; shops along W elevation with later shop fronts (not of special interest), together with the entrance to the maisonettes. Utilitarian service bays on east elevation to Earnshaw St. South end of the block has a remodelled pub front at ground floor (not of special interest). Above is a 2-storey tier containing offices. This is of equal height to the link, and is accentuated by a pre-cast concrete brise-soleil to E and W elevations forming a staggered rectangular pattern in front of the recessed windows (the S end is glazed). The upper level, placed above a set-back intermediary space, comprises a contrasting 6-storey section with 3 tiers of projecting rectangular balconies faced in grey geometric mosaic, alternating with sections of metal-framed curtain wall glazing with opaque glass panels beneath the windows. At either end of the block is a glazed stair compartment.

INTERIORS: the majority of the office, retail and residential interiors lack special interest. The following are of note, however: TOWER: the main entrance, originally at mezzanine level accessed by the external staircase, is now in the glazed entrance hall on the ground floor created in 2000; the lobby is thus now on two levels linked by a stair installed in 2000. The lobby is paved in a distinctive manner with alternating long-and-short strips of white marble mosaic tiles set within a field of black terrazzo. The space is dominated by the exposed upper sections of the pilotis. At either end of the tower are granite-faced lift shafts, and a staircase with balustrades of thick cast-glass sheets set below heavy metal handrails. The rest of the tower comprises functional offices which were designed to be adapted, as has been the case, and is not of special interest. The only exception is the surviving staircase between the 31st and 32nd floors, which was intended to serve a restaurant (which was never installed).

LINK: a stair with heavy timber staggered handrails leads up to link; at its foot is a pair of copper-

clad columns. The main space to the link has a central longitudinal mezzanine floor accessed by open stair at W end, and modern ramp at E. Mosaic floor matches that of tower lobby. Curtain-wall glazing on each side has a series of tapering glass fins which project upwards to the ceiling from the central steel patch-plates. Along each wall is a timber cill carried on a series of glass cross walls aligned with the glazed panels above; mezzanine has balustrades of similar design. At the E end is a further stair to the upper level of offices in the east block; mosaic floor to lobby.

EAST BLOCK: the former bank has a mosaic floor matching those of the tower lobby and link. Mezzanine level has a glazed timber balustrade, similar to that of link, supported on concrete piers clad in grey mosaic tiles. On the stair wall is an openwork sculptural metal relief by Jupp Dernbach-Mayen depicting banking motifs, currently (2012) in storage pending conservation work; on wall behind is a decorative panel of red and gold mosaic tiles on a grey tile background. The pub, shops, offices at intermediary level, and maisonettes above, are without internal features of note and lack special interest.

Books and journals

Cherry, B, Pevsner, N, *The Buildings of England: London 4, North*, (1998 revised 2001), 316

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'Building' in *Centre Point Symbol of the Sixties*, (24 May 1968), 99-106

Ambrose, E, 'Ideal Homes' in *The Sculptural Approach*, (February 1968), 90-94

Banham, R, 'New Society' in *An Added Modern Pleasantness*, (28 April 1966), 19-20

A7. LISTED BUILDING DESCRIPTION – 20 DENMARK STREET

Name: 20, DENMARK STREET, 16, DENMARK PLACE

- List entry Number: 1271980
- 16, DENMARK PLACE
20, DENMARK STREET
- The building may lie within the boundary of more than one authority.
- County: Greater London Authority
- District: Camden
- District Type: London Borough
- National Park: Not applicable to this List entry.
- Grade: II
- Date first listed: 14-May-1974
- Date of most recent amendment: Not applicable to this List entry.
- Legacy System Information
- The contents of this record have been generated from a legacy data system.
- Legacy System: LBS
- UID: 477057
- Asset Groupings
- This list entry does not comprise part of an Asset Grouping. Asset Groupings are not part of the official record but are added later for information.

List entry Description

Reasons for Designation

Legacy Record - This information may be included in the List Entry Details.

History

Legacy Record - This information may be included in the List Entry Details.

Details

CAMDEN

TQ2981SE DENMARK PLACE 798-1/104/303 No.16 14/05/74

GV II

See under: No.20 DENMARK STREET.

CAMDEN

TQ2981SE DENMARK STREET 798-1/104/303 (North side) 14/05/74 No.20

GV II

Includes: No.16 DENMARK PLACE. Terraced house with later shop, and former warehouse (known as No.16 Denmark Place) attached at ground floor level to rear. Now in use as shop and offices. c1686-89 as part of an estate development by Samuel Fortrey and Jacques Wiseman, early C19 warehouse.

House: multi-coloured stock brick; 4th storey yellow stock brick. Stucco keystones and string course at 1st floor. 4 storeys (4th storey later addition) 2 windows. Gauged red brick flat arches & dressings to recessed sashes with flush frames & exposed boxing. C20 shop at ground floor extends through into ground floor of No.16 Denmark Place. Warehouse: yellow stock brick, painted on ground and 1st floor; brown brick to rear. 3 storeys and basement. Ground floor has C20 shopfront; 1st floor, C20 windows; 2nd floor, original central loading doors, flanked by sashes. Parapet. To rear, a range of 6 unhorned, gated sashes to each of 1st and 2nd floors and chimney-stack full height of building to right.

INTERIOR: with pine beams, late C20 main stair and original subsidiary stair. 3rd floor has glazed roof lantern.