



28th November 2016

Dear Sir/Madam,

Re: Appeal against the decision to refuse Express Advertisement Consent at Camden Town Hall Annex, London WC1H 9JE

Please find enclosed completed Appeal papers submitted under the provisions of the Advertisement Regulations.

The Appeal relates to the Council decision to refuse Express Advertisement Consent for an 2.2 m by 1.0 m (reduced to 199sqm) open weave fabric mesh banner upon a fully working scaffold at Camden Town Hall Annex, Euston Road, London, WC1H9JE (LPA ref. 2016/4603/A). It is proposed that the commercial area of the display would be positioned upon the scaffold and be surrounded by a "1-1" mesh photo-montage of the building behind the scaffold. The forms, plans and other documents that accompanied the original application are attached to the appeal form, along with the Decision Notice dated 9th November 2016.

Reason for Refusal (decision notice 9th November 2016)

"The display of the shroud advertisement, by reason of its size, scale and prominent location, would be an obtrusive addition which would be harmful to the visual amenity of the street scene, the character and appearance of the conservation area and the setting of the surrounding listed buildings, contrary to policy CS14 (Promoting High Quality Places and Conserving Our Heritage) of the London Borough of Camden Local Development Framework Core Strategy and policies DP24 (Securing high quality design) and DP25 (Conserving Camden's Heritage) of the London Borough of Camden Local Development Framework Development Policies."

Grounds of Appeal

The appellant disputes the above reason for refusal and the grounds of appeal are detailed below.

Camden Town Hall Annex is undergoing major refurbishment and has been completely obscured by a scaffold and stark white monaflex sheeting and as a result in our view is currently... ***"harmful to the visual amenity of the street scene, the character and appearance of the conservation area and the setting of the surrounding listed buildings."*** This is a legitimate development site and the advertising will only be in situ for a limited period as substantiated within the application. The site is located in a heavily trafficked, predominantly commercial area where a variety of signage is to be expected. Planning regulations are largely supportive of advertising in such locations, stating that the effect of an advertisement should be considered in relation to the 'characteristics of the neighbourhood'.

In our initial planning application, we proposed to install a temporary shroud upon the scaffold, - a "1-1 image montage" – This 1-1 image would cover the scaffold and hide the ongoing works, completely obscuring the unsightly scaffold and replace the bright stark white debris sheeting and the works taking place within, thereby ameliorating many issues of on-site light pollution and works noise. This would be effective up to the highest point on the building.

From time to time, a commercial banner advert of 10m x 22m (reduced to 199sqm at Camden's request) less than 10% of elevation area would be displayed. Our proposal to limit the size of the proposed unilluminated commercial display to less than 10% of the available space upon the existing scaffold is in line with the Councils own guidelines for commercial banner advertising in such locations.

A drawing showing the position of the proposed commercial advertising banner space (Appendix page 1) "Camden Annexe 10% + external dimensions" was enclosed in our initial planning application and subsequently updated to reflect the reduced area agreed with Camden i.e. 199sqm (Appendix page 2). The drawing demonstrates how the commercial advertising space would be framed by the proposed "1-1 image montage" of the existing building.

We therefore suggest that the assessment of the visual amenity of our proposal should be considered against the scaffold



and monaflex and not the building itself as it is purely proposed for the redevelopment period. As the working scaffold, would be obscured at all times by a high-quality shroud, we dispute that our proposal can be considered as a detriment to visual amenity or to the adjacent Conservation Area. It is also important to make clear, that this advertisement display will, at no point, ever become a permanent fixture and therefore cannot be judged as having an impact on the amenity of the area. The building is under development for a significant and sizable international hotel so a long- term advertisement display is not possible.

It is important to note that previous council officers and planning inspectorates have all granted consent for identical schemes. i.e. short term temporary advertising displays onto temporary scaffolds within the same conservation area of Camden and throughout the borough in similar settings. - details attached (appendix page 3). It is not an unusual proposal or one that will have any sort of long term detrimental effect on the area.

Indeed, Matthias Gentet Camden planning officer stated on several different occasions including via email (appendix page 4) during the application process that our proposals met the relevant criteria and was to be recommended for approval. We understood that all amenity issues had been considered and that this banner complies with their guidance for such a location - CPG1 (Design) clearly states that:

"Where shroud and banner advertisements are considered acceptable on listed buildings or in conservation areas the advertisement should not cover more than 10% of each elevation and should not be fragmented. The location of the advertisement on the shroud will depend on the character of the local built form and the nature of views within it."

Camden subsequently requested a reduction in advert area to 199sqm (as referred to earlier in this statement appendix page 2 drawing). We were surprised to receive the request to reduce the advert area further as Camden (Mr Gentet) had previously suggested in their email of 30th Sept 15 for our previous application 2015/5487/NEW that *"The entire area of the Euston Road elevation is around 2226.7sqm, As such, the proposed advertisement must not exceed more than 222.7sqm to comply with the Council's policy"*. Our application for 220sqm was already less than 10% as calculated by Camden, but in attempt to appease them on this issue, we agreed to the further reduction to 199sqm and issued a supplementary elevation plan detailing the agreed reduced commercial area.

HS1 visual amenity objection

During the course of the application process we met with Ben Olney (Planning and Consent Manager HS1) & Josie Murray (historic Building advisor HS1) following their objection to our proposal.

Although they were unwilling to withdraw their objection to our current application, they did state that they would be supportive to a 100% 1:1 image shroud (no advertising content) as opposed to the current stark white monoflex.

Clearly this is unrealistic financially, as the unsupported cost for such an installation would be prohibitive. However, our proposed solution of a 100% 1 to 1 shroud incorporating a 10% advertising content from time to time when the commercial space is sold would be financially viable as the advertising would contribute to the installation and maintenance of the 1:1 image shroud. Surely our proposal is a far more sympathetic solution than the current stark white monaflex and would allow the building to sit better in its surroundings during this temporary redevelopment period.

Ben Olney (HS1) himself said of their objection in an email to us prior to our meeting " That of course is HS1's view, although this would not normally be a reason to refuse an application and the Council will need to demonstrate that your proposal is contrary to Camden Policy, you will need to discuss this with the Planning Officer"

Following the redevelopment of St Pancras some years ago the arch in question is rarely used and is no longer one of the main entry/ exit point from the station as suggested by Ben Olney of HS1.

It is our declaration that a scaffold covered by a professionally installed shroud would be a benefit to the visual amenity of the surrounding area, rather than the highly visible stark white sheeting currently installed. The benefits of this substantial 1:1 image of the host building in different shades of subdued grey incorporating a minor commercial element (from time to time when sold) should provide a positive outlook from St Pancras as opposed to the large pure white poorly fitting monaflex sheeting currently installed that sits at odds to the surrounding area.

To demonstrate the comparison between the 2 solutions, we attach 2 photos of a site (appendix page 5) we had in St Marks Square Venice on the Marciana Public Library during external refurbishment works. As you will be aware this is a world heritage



site.

- The first image is of the installed shroud with (illuminated) commercial advertising content ratio to 1:1 image was substantially higher than the (less than) 10% in this application.
- The second image is the same photo with an image taken of the current monaflex from Camden annex and photoshop'd approx. to scale onto the scaffold.

Even with the larger commercial advertising content shown on this image. we believe it clearly demonstrates how 1:1 and commercial image sits far more sympathetically with its surroundings than pure white monaflex. Please note - the Venice images are purely for comparison to highlight the difference between 1:1 shroud/ commercial advert AND white monaflex.

Finally, we would like to bring to your attention to a banner installed by Camden Council (appendix page 6) previously themselves whilst undertaking renovation works to the building when it was Camden council offices. As can be seen the installed banner is scaffold mounted, unilluminated and is similar if not slightly bigger than that proposed in our application and positioned in a similar location on the scaffold elevation. This is a far poorer installation than that proposed in our application and does not include any of the desirable 1:1 printed building image surrounding the banner.

A copy of all relevant papers has been sent to the Council.

Respectfully, the Inspector is requested to allow this appeal and to grant Express Advertisement Consent for the proposed advertisement display.

Yours Faithfully

Mark Wilkinson
Development Director
Infinity Outdoor Ltd



Appendix:

PAGE 1 – Camden Annex 10% commercial advert area (220sqm) + external dimensions

PAGE 2 – Revised Drawing with agreed revised 199sqm commercial advert area

PAGE 3 – Other Camden approved similar temporary scaffold banner consents

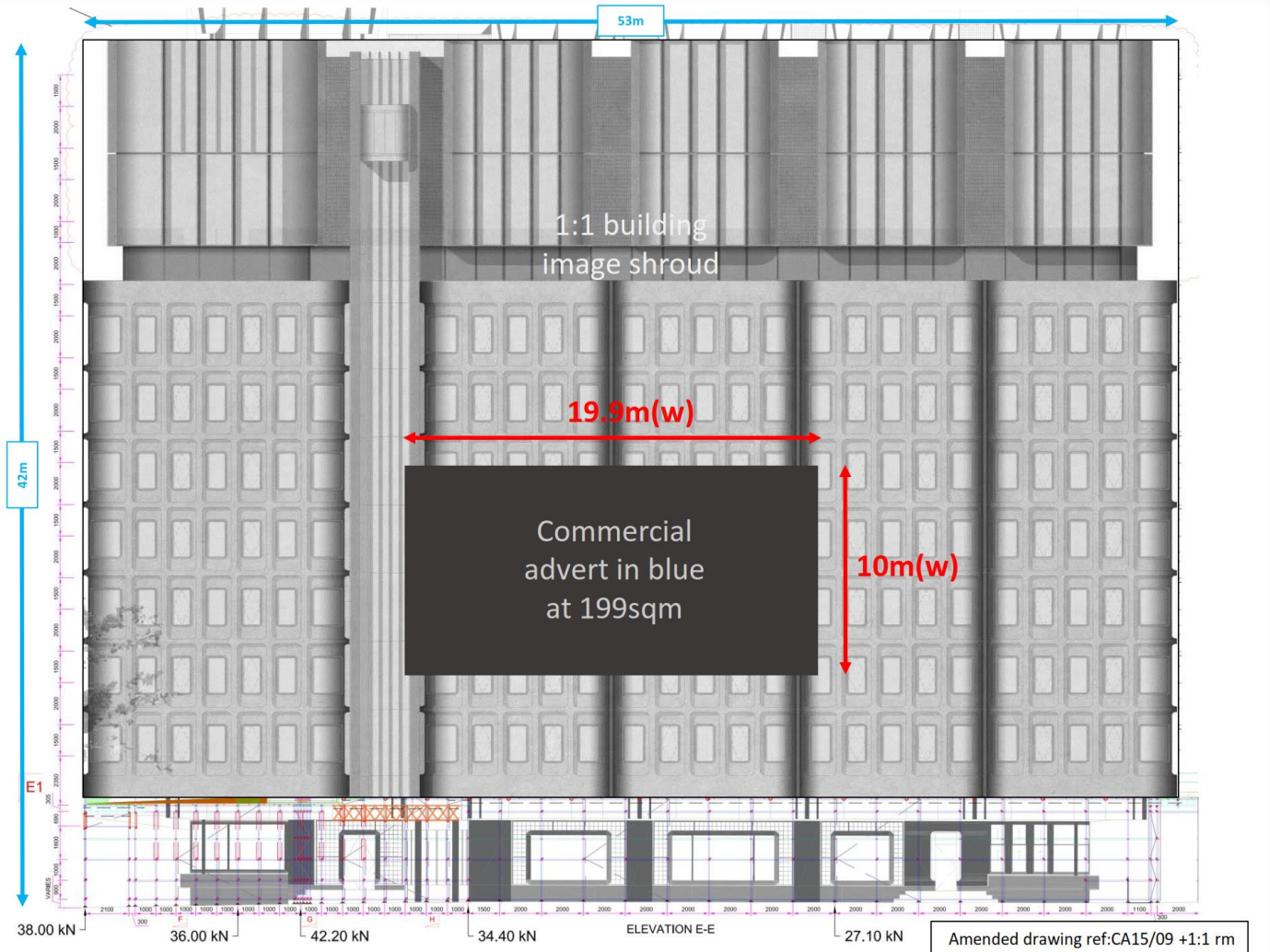
PAGE 4 – email From Mathias Gentet (Camden Council Planning Officer) advising application to be recommended for approval

PAGE 5 - Two images for demonstration of visual amenity comparison only between white monaflex sheeting and 1:1 shroud building image incorporating commercial advert area

PAGE 6 - Camden Council banner installed on same elevation of this same building previously

PAGE 1 – initial elevation drawing submitted with application 220sqm commercial advert area





PAGE 3 - Other Camden planning approved temporary banner consents:

2011/1413/A

6	<p>The advertisements hereby permitted are for a temporary period only and shall cease on or before 11th July 2013, at which time the advertisements shall be removed in their entirety.</p> <p>Reason: The Council would wish to review the permission at the end of the period to consider the progress of construction on site in order to ensure compliance with the requirements of policy CS5 and CS14 of the London Borough of Camden Local Development Framework Core Strategy and policy DP24, DP25 and DP26 of the London Borough of Camden Local Development Framework Development Policies..</p>
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2014/2687/A

The Council has considered your application and decided to grant consent subject to the following condition(s):

Conditions and Reasons:

1. The advertisement hereby granted consent shall only be displayed while the external refurbishment works which require scaffolding are being undertaken and shall be completely removed and the building made good by three months from the date of this permission or when the above works have been completed/scaffolding is no longer required, whichever is the sooner.

Reason:

In order to enable the Council to control the effects of the advertisement on the visual amenity of the area in accordance with policy CS5 (Managing the impact of growth and development), CS14 (Promoting high quality places and conserving our heritage of the London Borough of Camden Local Development Framework Core Strategy and policies DP24 (Securing high quality design) and DP25 (Conserving Camden's heritage) of the London Borough of Camden Local Development Framework Development Policies.

2 No advertisement is to be displayed without the permission of the owner of the site or any other person with an interest in the site entitled to grant permission.

Reason: - As required by regulation 2(1) and Schedule 2 of the Town & Country Planning (Control of Advertisements) (England) Regulations 2007.



PAGE 4 – email from Matthias Gentet advising application compliance with Camden planning guidelines:

On 25 Aug 2016, at 11:37, Gentet, Matthias <Matthias.Gentet@camden.gov.uk> wrote:

Dear Mark Wilkinson

In view of the revised proposed in line with what was originally advised, the application is to be recommended for approval.

I am, however, unable to issue the draft decision so soon after registration as we are allowing two weeks to allow for any possible comments even though this type of application rarely carry out consultations, others than the relevant internal and external bodies.

In this particular case, none of the statutory bodies have been consulted - the signage being non-illuminated.

I will aim to draft the decision by mid-September.

Many thanks

Matthias Gentet
Planning Technician
Regeneration and Planning
Culture and Environment
London Borough of Camden

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PAGE 5 – 2 images for demonstration of visual amenity comparison only between white monaflex sheeting and 1:1 shroud building image incorporating commercial advert area



PAGE 6 – Camden Council banner installed on same elevation of this same building previously

