



Planning Department
Camden Council
Camden Town Hall Extension
Argyle Street
London
WC1H 8ND

1st March 2017

// Digital Advertisement – St Giles High Street

Dear Sir or Madam,

Wildstone Planning has been instructed by Camden Council's Supporting Communities Directorate to submit an application for advertisement consent for the display of a digital advertisement on the above-mentioned site.

Background

Camden's grant funding from central government will have been halved by the end of the period from 2010/11 and 2018/19. As a result of this reduction in funding the Council is having to make cuts of £78m by 2018/19, with an additional £25m of cuts required by 2021/22, on top of the £93m already cut.

As part of Camden's Medium Term Financial Strategy, following resident consultation on Camden's Financial Challenge in 2014, it was agreed that £1.5m of income should be generated from the installation of digital screen advertising in the Borough to reduce further cuts to frontline services. It is hoped that digital advertising will bring in essential funding to continue delivery of our frontline services. Unfortunately, there is a risk that if Camden cannot deliver this income target further cuts would need to be identified to balance the budget.

This application forms part of this strategy to deliver additional revenue to off-set cuts and is brought forward following a rigorous site selection process involving the Council's Highways, Planning and Regeneration and Place Teams and responses received from the pre-application public consultation. Each site was assessed having regard to amenity and public safety considerations.

Public Consultation

In addition to internal consultees, the applicant has also engaged local residents in the vicinity of the site. The following comments were received during the public consultation exercise:

- // One response was received from a local resident who expressed some concerns regarding amenity and public safety, however, concluded that they could not form an opinion until further information regarding the size of the advertising unit was made available.

The design and siting of each advertising proposal has been informed by comments received during the internal and external consultation exercise. As a result of this process, a final design has been produced which incorporates concerns thus produces a far more appropriate proposal for its context.

Site Description and Planning History

The application site is located in the Holborn and Covent Garden ward of the London Borough of Camden land at the junction of Shaftesbury Avenue and St Giles High Street/A40.

The area does not have a consistent character in terms of design, materials, form or building pattern. The surrounding area features a range of mainly commercial buildings ranging in height from four to eleven storeys. A range of uses are evident in the surrounding buildings, including retail, offices, leisure and residential. Buildings of note in the immediate surroundings include the ultra-modern Central Saint Giles building which is located opposite the application site and the historic Shaftesbury Theatre which is located approximately 75 metres to the north east. The surrounding street furniture consists of several mature trees, rubbish bins, a telephone kiosk, traffic signals, a lamppost and street signs. A set of traffic lights is located immediately adjacent to the application site whilst further sets of lights are evident in close proximity on the A40 adjacent to the junction with the B401 and next to the Shaftesbury Theatre.

Whilst there are no examples of large format advertising in the immediate surrounding area, there is widespread fascia advertising, including large scale adverts promoting theatrical productions. Advertising is also apparent on telephone kiosks and bus shelters in the vicinity. There is an existing advertising column featuring air quality monitoring equipment adjacent to the application site which would be removed as part of the proposals.

The application site is not subject to any specific policy designations, nor is it located within a conservation area. There are several listed buildings in close proximity including the aforementioned Shaftesbury Theatre which is Grade II Listed. The St Mungos Housing building is Grade II Listed and is located approximately 60 metres to the east whilst the drinking fountain located approximately 55 metres to the north east at the Junction with Shaftesbury Avenue and St Giles High Street is also Grade II Listed. The proposed structure and advertising display is sited and orientated such that the setting of the listed buildings/structures will not be negatively impacted upon. There are no locally listed buildings in close proximity. The site is not located within an area of Special Advertisement Control or within the root protection zones of the surrounding trees.

The site is undeveloped and there has been no planning history of relevance. Advertisement consent was granted for a freestanding internally illuminated advertisement column located adjacent to the application site in November 1999 (LPA Ref: AS9904935). The advertising column also features air quality monitoring equipment and will be removed should consent be granted for the application proposal.

Application Scheme

Wildstone's Design Studio has worked with Camden's Planning and Regeneration and Place Teams to evolve the design for the site.

It is proposed to locate a freestanding digital advertisement unit at St Giles High Street. The advertising unit will be located at the junction of St Giles High Street and Shaftesbury Avenue.

The proposed screen will be a single sided portrait format measuring 2 metres by 3 metres along with an associated logo box. The screen will feature modern LED technology which will enhance the quality of the development.

The proposal has been subject to a unique design approach by Wildstone's in house design team in the context of the setting whilst the cladding materials have been chosen according to the characteristics of the site. The design is minimalistic in nature, focused on the simplicity of a monopole, whilst deriving inspiration from high quality corporate commercial infrastructure. The structure will be clad in high quality materials that are in keeping with the cityscape and modern architecture apparent throughout the London Borough of Camden. The materials consist of composite stone cladding (portland stone finish) which is extremely versatile (can be moulded and comes in a variety of finishes) and grey painted steel to provide a design link to the local architecture. The result is that the proposed structure is attractive in its own right without being overly prominent.

The proposed advertisement location is at the edge of a wide stretch of pavement. A barrier is in place which prohibits pedestrians from crossing Shaftesbury Avenue, other than at the traffic signal controlled crossing point. The surrounding street furniture consists of several mature trees, rubbish bins, a telephone kiosk, traffic signals, a lamppost and street signs. The closest piece of existing street furniture is the aforementioned advertising column which will be removed should consent be granted. The proposed advert is located at a sufficient distance from each of the other existing items of street furniture so as to avoid clutter on the streetscene.

The advertisement will primarily be used for the display of commercial advertising although a proportion of the time (up to 10%) will be used for non-commercial advertising and public announcements.

It is proposed that the digital screen will only display static images (i.e. no moving images or flashing lights) will be displayed. The advertisements will change sequentially a maximum of once every ten seconds. The changeover between adverts will take place instantaneously in line with established best practice.

The maximum luminance levels of the screen at night will not exceed 300 cd/sq.m from dawn till dusk. This accords with the advice for illuminated advertisements from the Institute of Lighting Professionals (ILP) Technical Guidance Note 5 (2015). The screen will be fitted with a light sensor, which will be used to control lighting levels automatically during the day, which will ensure that the level of luminance is sensitive to the change in sunrise and sunset from summer to winter and environmental conditions. The screen will have a fail-safe system so that the screen turns black should there be an error.

The advertising structure and media screen will be constructed in a manner that minimises disruption to the highway network. It is proposed that the structure will be fabricated off-site and will be craned in to place over night to avoid disruption to the highway network. The media screen will be implemented on site.

The screen will be remotely controlled via broadband or wireless connections, which will mean that images can be changed without the need to visit the site. Planned maintenance of the structure and media screen can be carried out at times to minimise disruption to the highway network

Any advertisement consent will be granted subject to the five standard conditions. It is proposed that in order to control the operation of the digital display the following special conditions should be applied to any advertisement consent:

- // The intensity of the illumination of the signs shall not exceed 300 cd/sqm from dusk till dawn;
- // Any change in advertisement display shall be instantaneous;
- // The signs shall not display any moving, or apparently moving, images;

- // The advertisements displayed on each panel shall not change more frequently than once every 10 seconds;
- // The existing advertisement shall be removed prior to the implementation of the consented advertisement; and
- // Details of the proposed public art shall be submitted to and approved by the local planning authority prior to the implementation of the scheme.

The above special conditions are now used as best practice for the control of digital advertisements having been originally proposed by Transport for London (TfL) in relation to applications adjacent to the strategic road network.

Art Work

The proposed design only features a single media screen which provides an opportunity on the rear elevation to create an art work, which has a visual amenity and artistic benefit to the scheme and the surrounding built environment.

Wildstone's design team has created an artistic approach for the rear elevation using a technique to laser cut the metal cladding to create a pattern with three dimensional qualities. It is proposed that each single-sided site will have a pattern which combined with the proposed materials will create a unique pattern. The technique is extremely flexible and provides infinite opportunities to create interesting and thought provoking art works which will enliven the rear facades and create a point of interest rather than having a blank elevation. The application drawings and illustrative design material show the final detail of the art work and its visual appearance.

Planning and Policy Considerations

National Policy Overview

The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 is the legislative framework upon which the National Planning Policy Framework (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.

Paragraph 9 of the NPPF states that pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment. The NPPF places great importance on the design of the built environment and as such is a key aspect of sustainable development.

The NPPF states that advertisements should be subject to control only in the interests of amenity and public safety, taking into account cumulative impacts.

The NPPF states the following specifically in relation to advertisement control at paragraph 67:

"Poorly placed advertisements can have a negative impact on the appearance of the built and natural environment. Control over outdoor advertisements should be efficient, effective and simple in concept and operation. Only those advertisements which will clearly have an appreciable impact on a building or on their surroundings should be subject to the local planning authority's detailed assessment. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts."

The NPPF states that heritage assets may be affected by direct physical change or by change in their setting. As such, the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals (Paragraph 09 Historic Environment).

The location of the advertisement has been chosen, in part, to ensure that there is no adverse effect on amenity or public safety caused by the advertisement element.

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.

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. In assessing applications for advertising regard is given to Core Strategy Policies CS5 (Managing the Impact of Growth and Development) and CS14 (Promoting High Quality Places and Conserving Our Heritage) along with Development Policies DP17 (Walking, Cycling and Public Transport), DP21 (Development Connecting to the Highway Network), DP24 (Securing High Quality Design), DP25 Conserving Camden's heritage and DP26 (Managing the Impact of Development on Occupiers and Neighbours).

The application site is not located within an area that benefits from an adopted Neighbourhood Plan or approved Neighbourhood Forum.

More specific advice is provided within the Camden Planning Guidance (CPG) documents which are Supplementary Planning Documents (SPD). Chapter 8 of CPG1 – Design, deals directly with advertisements signs and hoardings and more specifically with large format advertising at paragraphs 8.16 to 8.19.

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.

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.

Compliance against National and local policy will be considered in the next section in so far as it relates to amenity and road safety, in accordance with the Advertisement Regulations.

Amenity

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 Policy Guidance (NPPG) provides more specific advice on how amenity impacts should be assessed and which locations are appropriate for large format advertising. The local characteristics of the site are therefore material in assessing the proposal's impact. In this instance the proposal site is not in a conservation area and is in the commercial area of a major city. The character of the surrounding area is that of a busy commercial area with the scale and form of development consistent with this, with large scale modern buildings predominating. However, there are residential uses in proximity above retail units and within the Central Saint Giles building opposite. As such, it is perhaps fitting to describe the context of the surroundings as mixed in character.

Typical of a location of this kind, other forms of advertising in the immediate and surrounding vicinity are present and include illuminated shop fascia signs, A-boards, advertising on bus shelters and large fascia adverts promoting theatrical productions which have all helped to establish the general location as acceptable in principle for advertising.

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 simple and elegant structure has been designed to integrate into its surroundings, the straightforward design drawing inspiration from high quality corporate commercial architecture. The proposal is a well-considered design that will incorporate high quality, robust materials that are in keeping with the cityscape and the modern architecture of the surrounding area. As such, the structure will fit seamlessly into its surroundings. This is also consistent with the NPPF which attaches great importance to good quality design and requires that Local Authorities give great weight to "*outstanding or innovative designs which help raise the standard of design more generally in the area*" (Paragraph 63).

Whilst the proposed advertising display unit is in the vicinity of several listed buildings/structures, its orientation and distance from these properties is such that their settings will not be unduly compromised. In addition, the settings of the heritage assets have been significantly altered by the surrounding large scale, modern developments. As such, the settings are confined to the respective, individual boundaries and would not be further compromised by the proposals. As such, the proposed advert will be located such that it would not affect the setting or the understanding of the significance of any of the listed

buildings in the surrounding area in terms of their architectural or historic interest and would comply with policies CS14 and DP25.

The size of the proposed display has also been carefully selected to ensure visibility from the road in order to meet market requirements, whilst remaining in context and subordinate to the surrounding buildings.

The applicant is of the view that the proposals are in accordance with paragraph 8.17 of CPG1 – Design:

- // Locations where they may prevent or significantly damage views or obscure light - The application site is not located in the vicinity of any key views and the elegant and sleek design and siting ensure that light will not be obscured;
- // Locations where they are forward of the face of adjoining buildings - Whilst the proposed advertising location is forward of the face of adjoining buildings, this brings it into line with the existing street furniture (trees, bins, telephone kiosk, street sign, lampposts). It should also be noted that the proposed location is an atypically wide section of footpath which offers ample space for such an installation. The proposal also concerns a slimline free standing structure (rather than a typical hoarding type display) which complements the existing street furniture;
- // Locations where they project above roof ridge/eaves level - The proposed structure is free standing and so will not project above roof ridge/eaves level;
- // Locations where they obscure architectural features or landmarks (including windows or window recesses) - The structure will not obscure any architectural features or landmarks given that it is set away from the adjacent buildings; and
- // On side walls where they would be unduly dominant - The proposal is not wall mounted.

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 siting and orientation of the display has been carefully considered to ensure that no residential properties are unduly affected by the proposal in accordance with policy DP26. The nearest residential properties are located approximately 20 metres to the south west (above retail units on Shaftesbury Avenue) and 17 metres to the north (Central Saint Giles). These properties will be unaffected by the proposal due to the orientation of the proposed advertisement. Whilst there may be some properties at Central Saint Giles where the advert could be visible, this will be at an oblique angle. It is worth noting in this regard that LED displays are only visible in a 140 degree arc, with the brightness and image clarity dropping off considerably beyond 90 degrees. The application proposals comply with Policy CS5 and Policy DP26 in that the orientation of the display is away from residential properties.

Illuminated advertisements are common in the surrounding area. The display will be fully controllable and the luminance would be limited to 300cd/sqm at night time, which would be in accordance with the Institute of Lighting Professionals (ILP) Technical Note 5 on roadside advertisements. It should also be noted that site is located within an inner city location where brightly lit surroundings are the norm. Streetlights, fascia signs and lighting associated with the Shaftesbury Theatre are all evident. As such, the proposal will complement the character of the area in accordance with paragraph 8.19 of CPG1 – Design. The hours of illumination can also be limited by condition if this is required.

As previously mentioned, the application site is located on an abnormally wide section of pavement. This allows for the structure to be sited away from the adjacent building without causing an obstruction. The existing advertising column is due to be removed and there is ample space for pedestrians to navigate around the structure and existing items of street furniture which are set back from the most convenient pedestrian route.

It is noted that the Covent Garden area has higher than average levels of crime. The design and siting of the structure have been carefully considered so as to reduce the opportunity for crime whilst also allowing for ease of maintenance and management. The slimline design of the structure and its location away from the building line will limit opportunities for potential criminals to find hiding spaces. The illumination of the display will also act as a deterrent in this regard. As such, the proposal complies 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 proposed display will be in keeping with the scale of the existing and adjacent buildings, and will contribute positively to the city centre streetscape without resulting in advertising clutter or detrimental impacts upon residential amenity. The bespoke structure features an innovative design, comprising of cladding patterns, presenting as attractive piece of public art to pedestrians and motorists alike. The proposed method of illumination for the display is internal, and will comply with ILP guidelines. As such, the proposal constitutes a high quality design in accordance with policy DP24.

In summary, the proposal accords with national and local policy and will contribute a high-quality, bespoke, architecturally designed structure with suitable advertising display in this central commercial area.

Public Safety

Digital advertisements are now a common sight alongside roads in major cities and as such are not an "unusual" distraction for drivers. Drivers are used to distractions in urban areas, whether it be buildings, people, shop fronts, traffic signs or other adverts. The advertisement would be no different in terms of attracting a driver's momentary attention and would not impact on the driving task.

Research on roadside advertising demonstrates 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 tended 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. There is no conclusive evidence to show that a correlation exists between advertising and road safety.

As such the key considerations are whether the location is appropriate (i.e. undemanding on the driver); and whether the level of illumination and the sequential change between adverts is controlled to prevent distraction from the driving task.

The advertisement is positioned and designed to be readily visible and will attract attention without causing a dangerous distraction. The site is located on the southern side of St Giles High Street and the advertising will be directed towards westbound vehicular traffic as well as pedestrians and cyclists.

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 (with a speed limit of 30mph) 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. There are also traffic lights at the junctions of St Giles High Street and Shaftesbury Avenue immediately adjacent to the application site whilst further sets of lights are evident in close proximity on the A40 adjacent to the junction with the B401 and next to the Shaftesbury Theatre. These traffic lights serve to slow traffic further in the vicinity of the application site. The advert will not obscure the signals and would be visible behind them for some distance to the east.

There is one traffic sign in the vicinity of the proposed display. This is located on a traffic island approximately 40 metres to the east. The advert would be located behind the signs and would not cause drivers to look a significant distance from the signs. There would be no conflict between the proposed advertisement and traffic sign.

It should also be considered that St Giles High Street and Shaftesbury Avenue are one way roads in the vicinity of the application site. Thus, motorists travelling along Shaftesbury Avenue will have no view of the advertisement display. The sole decision making point for drivers travelling westbound is located approximately 140 metres east of the application site. At this point drivers must navigate into one of the two left hand lanes if they wish to turn left onto Shaftesbury Avenue. The decision making point is located at a sufficient distance from the advertising display so as not to constitute a distraction.

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 footway at the application site is of substantial width. The siting of the structure will not adversely impact upon pedestrian flow and has been located away from the point of main pedestrian thoroughfare at this location. In addition, there is fencing along the boundary of the footpath adjacent to the proposed location. As such, pedestrians are directed towards the signal controlled crossing and will not have their sightlines compromised by the structure when crossing the road.

The location of the advertising display unit on a wide stretch of footpath ensures that it can be serviced safely without the need for lane closures.

As the proposal is for digital advertising, the display is entirely controllable. It is proposed to limit the level of illumination and the rate and speed of change of adverts to ensure that the display does not cause glare or become an unacceptable distraction to drivers. In addition, there will be no moving images or flashing lights displayed in accordance with the digital roadside code and TfL's Guidance.

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.

A review of the available CrashMap demonstrates that there were no 'serious' accidents at the junction of St Giles High Street and Shaftesbury Avenue during the three year period from 2014-16. There have been 4 slight incidents during this period involving traffic involving vehicles travelling in a direction where the proposed advert could be viewed, which is a positive indication in terms of road safety in the vicinity and demonstrates that this is not a complicated or dangerous section of road.

Taking into account the above, it has been demonstrated that the proposal complies with the requirements of the TFL Advertising Safety Guidance Form, and, as such, is considered to be appropriately located and appropriately controlled to ensure that driver and pedestrian safety is not compromised.

Conclusion

The application proposes to create a high quality advertisement in a commercial location adjacent to a busy road. The character and setting of the area is entirely appropriate for an advert of this scale and type.

The advertisement would not give rise to any public safety concerns due to the character and layout of the road network in the immediate area.

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 Wildstone Planning;
- // Cover letter prepared by Wildstone Planning (this letter); and
- // Architectural drawings prepared by Wildstone Studio;
 - // 9057_PP_01 Site Location Plan;
 - // 9057_PP_02 Existing Site Plan;
 - // 9057_PP_03 Proposed Site Plan;
 - // 9057_PP_04 A-A Elevation;
 - // 9057_PP_05 B-B Elevation;
 - // 9057_PP_06 Specification Sheet;
 - // 9057_PP_07 Design Sheet; and
 - // 9057_PP_08 CGI.

Payment of the application fee of £385 to cover the cost of the Advertisement Consent application is made separately.

It should be noted that at the pre-application stage Highways advised a road safety assessment would not be required to validate and determine the application.

I trust you will find the application in order and look forward to receiving notification of the registration of the application in due course. Should you require any further information to validate the application please do not hesitate to contact me.

Yours faithfully,

Philip Allard

Planning Director

For and on behalf of Wildstone Planning

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