



**WILDSTONE  
PLANNING**

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

2<sup>nd</sup> March 2017

## // Digital Advertisement – High Holborn

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 and the following resident groups:

// Bloomsbury Conservation Area Committee (BCAC)

No comments were received during the public consultation exercise. The design and siting of each advertising proposal has however been informed by comments received during the internal consultation exercise with the Council. 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.

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## Site Description and Planning History

The application site is in the location of an existing JC Decaux Advertising Column and WC on the public highway at High Holborn. The "Willmotte Column" dates from 2008 and contains a single public toilet as well as serving the primary purpose of supporting advertising on the exterior. The site is located on a wide section of pavement to the south of the main carriageway, adjacent to the Pret a Manger and Waitrose retail units.

The area is predominantly commercial and dominated by large scale office developments most of which have active ground floor frontages. There do not appear to be any residential properties in the vicinity of the site, although the Rosewood Hotel is located approximately immediately to the southeast.

There is a wide variety of advertising and signage in the surroundings, both in relation to the ground floor units, the existing CIP panel and bus stop to the east of the site. There is also a 12m x 3m digital billboard located 50m north of the site on the road bridge elevation of 1-11 Procter Street (LPA Ref: 2011/1208/A), which can not be assimilated in the same views as the application site.

The site is within the Central London Area and is also part of a growth area as defined on the proposals map. The proposal site is within the Bloomsbury conservation area where there are listed buildings. The closest listed buildings are the Pearl Assurance Company (Grade II), 233 Holborn (Grade II) and 114 and 115 High Holborn (Grade II).

Although there have been a number of other consents for advertisements granted in the surrounding area these mainly relate to shop and building signage and are not directly relevant to the proposal. Of greater relevance, there are currently applications pending for the conversion of the poster adverts in the bus stops along High Holborn to a digital format (LPA Refs: 2017/0291/A; 2017/0294/A; 2017/0269/A).

## Application Scheme

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

The proposal seeks consent for a freestanding single-sided advertising display targeting pedestrians and the westbound vehicular traffic on High Holborn. The media display will be made up of a series of interlocking LED panels and will include an additional logo box for the media owner. Screen content will be controlled remotely allowing changeover between adverts without the need for operatives to visit the site. On the rear elevation, it is proposed that this will be used for a public art work which will be created using a laser cutting technique. This will create visual and artistic interest.

The advertisement display will be incorporated into a bespoke architecturally designed structure, which will have an elegant and sculptural form. The structure has been designed to minimise the footprint and to be an attractive piece of street furniture. The proposed materials of a composite portland stone and grey steel detail are found elsewhere in the surrounding public realm. Portland stone is a particular feature of the local architecture whilst the painted steel is in common with surrounding street furniture.

The structure is sited in place of an existing advertising unit and has a smaller footprint thereby reducing the level of potential obstruction to pedestrians.

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 screen will only display static images (i.e. no moving images or

flashing lights will be displayed). The advertisement 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 screens 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 screens 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 screens 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 displays shall not display any moving, or apparently moving, images; and
- // The advertisements displayed on each panel shall not change more frequently than once every 10 seconds.

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. The hours of illumination can also be limited by condition if required.

## Public Art

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. The proposal has been designed for the locality and is in scale and keeping with the surrounding features.

As the proposal is within a Conservation Area and proximate to listed buildings there is a general duty for the Council to preserve or enhance the character and appearance of the Conservation Area and to protect the significance of listed buildings in accordance with the

Planning (Listed Buildings and Conservation Areas Act) 1990.

Paragraph 128 of the NPPF requires applicants to describe the significance of the heritage assets affected, with the level of detail proportionate to the assets' importance and no more than is sufficient to understand the impact of the proposal on their significance. Paragraphs 134 and 135 of the NPPF requires assessment of the effect of a proposal on the significance of the asset balancing any harm against benefit.

## 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).

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 hoarding 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.

With specific reference to this site, the proposal must also be considered in the context of the Bloomsbury Conservation Area Appraisal.

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.

As set out in the previous section, National Planning Policy Guidance (NPPG) provides specific advice on how amenity impacts should be assessed and which locations are appropriate for large format advertising. The guidance confirms that the local characteristics of the site are material in assessing the proposal's impact. In this instance the proposal site is in the commercial area of a major city. Whilst located within a conservation area, the character of the site is that of a busy commercial area with the scale and form of development consistent with this. Furthermore, the majority of the commercial buildings have active frontages with signage and advertising prevalent.

The size of the proposed display has 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 supporting structure is a well-considered design that will incorporate high quality, robust materials. This is 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). Furthermore, the high quality design approach is consistent with the requirements of Core Strategy Policy CS14 part (a) and Development Policy DP24.

The proposal site is not within a residential area nor is it close to any residential properties and as such will not be harmful to residential amenity. Whilst there is a hotel in close proximity, the signage is a sufficient distance away not to materially increase the amount of light to windows and any views from inside the hotel would be at an oblique angle and screened by trees.

The advice within CPG 6 (part 5) recommends the use of conditions to control lighting and protect against environmental nuisance. In this regard, the luminance of the displays will be controlled to be within ILP guidelines as set out in PLG05 "The Brightness of Illuminated Advertisements and ILP Guidance Notes on the Reduction of Obtrusive Light (GN01:2011). A curfew will also be set for 11pm when the displays will be switched off completely. Such measures will ensure residential amenity is protected and that the proposal is compliant with Camden's Core Strategy Policy CS5 Part (d) and (e) as well as Development Policy DP26.

More generally, the proposal can be considered against the Camden CPG criteria for large format advertising as follows (see paragraph 8.17 of Camden CPG as set out earlier):

- // Locations where they may prevent or significantly damage views or obscure light – The proposed advertisement is oriented so that it would not interfere with or damage views or obscure light to neighbouring buildings;
- // Locations where they are forward of the face of adjoining buildings - The proposed advert is in an area of public realm and thus will not impact on building lines of surrounding development;
- // Locations where they project above roof ridge/eaves level - The scale and height of surrounding buildings means that the proposed advertisement would not project above the roof/eaves level;
- // Locations where they obscure architectural features or landmarks (including windows or window recesses) - The proposed advert does not obscure a strategic view or any architectural features or landmarks in the surrounding area; and
- // On side walls where they would be unduly dominant - The proposed advert is in an area of public realm and thus will not be located on a side wall.

Considering amenity in the context of National and Local Policy, the proposal can be

considered as policy compliant.

## Heritage Assessment

As set out above, where a proposal is within a conservation area or close to listed buildings there is a requirement to consider the whether the proposal preserves or enhances the conservation area or whether it might impact on the significance of a heritage asset. In this regard, it should first be noted that the context of the conservation area is commercial and advertising and signage is already prevalent. As such, the area is quite robust in terms of its sensitivity to change. The proposal also replaces an existing advertising column which dates from 2008.

Reference to the Bloomsbury Conservation Area Appraisal (BCAA) confirms that High Holborn has been a major commercial area for several centuries. The appraisal notes the mixed architectural style and the contrast between the busy thoroughfare of High Holborn with the quiet side streets, commenting that *"this adds to the interest and vibrancy of the area, where old and new stand side by side, often harmoniously stitched together"* (Para 5.163). In this context a modern advertising feature is clearly appropriate providing it matches the quality of the surroundings.

The BCAA acknowledges the pressure for new advertising in the area as well as for many other forms of development, but comments that high quality new development that is appropriate for its context can preserve or enhance the conservation area. It is also acknowledged with respect to the existing site itself that advertising can be a positive contributor. However, a proliferation of signage, even of an appropriate design, could harm the character of the conservation area. The proposal would be replacing an existing advertisement unit (which supports an overall larger area of advertising) with a modern design that is in keeping with the high quality public realm and which is considered to be of sufficient quality to preserve and indeed enhance the conservation area.

The BCAA also references the listed buildings in the area, noting that the Grade II Pearl Assurance Building is the most notable building on the south side of High Holborn. In the baroque style and originally dating from 1910-12 the front elevation was extended in 1960 and has a number of architectural features of note. However, the building is not part of a grouping and given the diversity of the surroundings the setting is not considered to be a significant element of the listing. Regardless, the proposal would not materially alter the setting and as such the significance of the asset would not be harmed.

Number 233 High Holborn (Grade II) and 114 and 115 High Hoborn (Grade II) are also listed due to their architecture, although very different in style. 233 High Holborn is a modernist building completed in 1930 using a concrete frame and cement render in the style of Le Courbusier, whilst 114 and 115 High Holborn are more classical in style. Again, neither form part of an asset grouping and both contribute to the eclectic mix of architecture in the area. The significance of the assets would not be altered by the application proposal.

Taking the above into account the proposal is therefore considered to be acceptable in terms of Chapter 12 of the NPPF and the Council's Development Policy DP25 part (d) and to meet the statutory requirements of the Planning (Listed Buildings and Conservation Areas Act) 1990.

## Public Safety

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). Suitable controls have been proposed over the operation of the display which will reduce the risk of

distraction to motorists.

Digital advertisements are now a common sight alongside roads in major cities and as such are not an “unusual” distraction for drivers. The TfL Guidance on Roadside Advertising concludes that “is not inherently unsafe but should be operationally managed in accordance with the site-specific constraints of the location”. Sites at locations with increased driver cognitive demand should not immediately be excluded or discounted, but should be subject to detailed assessment.

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

The advertisement is positioned and designed to be readily visible and will attract attention without causing a dangerous distraction to drivers, pedestrians or cyclists.

The acceptability of the proposed advertisements in terms of public safety has been assessed using the methodology recommended in TfL’s Roadside Advertising Guidance as follows:

- // The proposed advert is located on a relatively straight stretch of road with long views on the approach;
- // The nearest traffic signals are at a pedestrian crossing approximately 50 east of the site. Whilst the display would be likely to be visible on the approach to the traffic lights, it would not be prominent and would not conflict with them;
- // The advertising structure is proposed to be located so as not to cause any physical obstruction to vehicles or pedestrians. Sufficient pavement width will be maintained;
- // Maintenance of the screens will generally take place without requiring physical access to the screens. However, if physical access is required there is sufficient pavement space for access to service the screens;
- // The structure does not impact on sightlines or visibility for vehicles or pedestrians;
- // Traffic accident data for the last five years has been analysed. This shows that there have been four slight accidents in the vicinity of the advertisement over this period. Given the volume of traffic using this route this represents a very low accident rate over a five year period and the site should not be considered to be high risk.

As the proposal is for digital advertising, the displays are entirely controllable. It is proposed to limit the level of illumination and the rate and speed of change of adverts to ensure that the displays do 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.

## Conclusion

The application proposes to create a high quality advertisement in a commercial location adjacent to a busy road, replacing the existing advertising which has been in situ for almost ten years. 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;
  - // 9059\_PP\_01 Site Location Plan;
  - // 9059\_PP\_02 Existing Site Plan;
  - // 9059\_PP\_03 Proposed Site Plan;
  - // 9059\_PP\_04 A-A Elevation;
  - // 9059\_PP\_05 B-B Elevation;
  - // 9059\_PP\_06 Specification Sheet;
  - // 9059\_PP\_07 Design Sheet
  - // 9059\_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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