



**WILDSTONE
PLANNING**

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

2nd March 2017

// Digital Advertisement – Theobalds Road/ Old Gloucester 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 public consultation. The assessment of each proposed site considered the size and siting of the advertisement having regard to the site context and character.

Public Consultation

In addition to internal consultees, the applicant has also engaged local residents in the vicinity of the site and the following residents group:

// Bloomsbury Conservation Area Advisory Committee (CAAC)

Two comments were received during this consultation exercise including a request for further information regarding the screen's specifications which are provided in the associated drawings and this letter. The other comment related to the erection of advertising on bus stops along Theobalds Road and thus did not directly relate to this proposal.

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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 within the Holborn and Covent Garden ward of Camden and forms part of the Council-owned pavement situated on the northern side of Theobalds Road to the east of Old Gloucester Street. The site itself currently contains an unused kiosk which is planned to be replaced by the proposal. The kiosk is of poor quality and contains a proliferation of advertisements. A mature tree is located to the north of the site and will remain unaffected by the development. The area to the east contains bicycle racks and two telephone kiosks which currently contain non-illuminated poster advertising. The surrounding area is wholly commercial in character with large scale office buildings, hotels and other commercial uses surrounding the site. The area does not have a consistent character in terms of design, material or building pattern and buildings vary in height (3 to 10 storeys) and range in period of build.

Theobalds Road itself is a straight, relatively uncomplicated, section of road and carries high volumes of traffic with two lanes for east bound general traffic and one lane for west bound buses. The surrounding road system is also relatively uncomplicated and includes a traffic light controlled cross-junction of the A40/Southampton Row approximately 80 metres to the west of the site and the junction of Old Gloucester Street/Theobalds Road immediately west of the site. A pedestrian crossing is also located approximately 30 metres to the west of the site.

According to the Camden Proposals Map, the site is located within the Central London Area and the Holborn Growth Area. The Kingsway Conservation Area is located approximately 15 metres to the south west of the site across Theobalds Road and the Bloomsbury Conservation Area is located approximately 60 metres to the south west of the site across the junction of the A40/Southampton Row. The Red Lion Gardens area of designated Open Space, located approximately 80 metres to the south west, is also just visible from the site. The Cochrane Theatre, located to the east of the site, has been granted a Certificate of Immunity (Col) by Historic England which expires in 2018. There are a number of statutorily listed buildings to the south west of the site between 45 metres and 130 metres away and include the Victoria House and Attached Railings; Avenue Chambers; Numbers 25-35 and 35a and Attached Screen to Sicilian Avenue; a Telephone Kiosk; and Kingsway Tram Subway (all Grade II) and the Central St Martins College of Art and Design (Grade II*). There are no locally listed buildings in the vicinity of the site.

Other than the kiosk, the site is undeveloped and there has been no planning history of relevance. Nevertheless, there are other advertisement applications of relevance in the immediate area as follows:

- // A number of applications have recently been submitted to the London Borough of Camden regarding the installation of digital screens to existing bus stops. These applications were submitted on 23/01/2017 and are still pending consideration by the Council. The advertisements are located between 80 metres and 120 metres from this proposal site and are located at: 45 Theobalds Road (LPA Ref: 2017/0288/A); 98 Theobalds Road (LPA Ref: 2017/0270/A);
- // An application for the display of 2 internally illuminated advertisements was submitted to the Council at 128 Theobalds Road (LPA Ref: 2017/0645/A / 2017/0457/P). This application proposes the replacement of two telephone kiosks with a singular kiosk incorporating digital advertising. This site is located immediately east of the site. The application is pending consideration by the Council.

- // An application for the display of 2 internally illuminated advertisements was submitted to the Council at 67 Theobalds Road (LPA Ref: 2017/0581/A / 2017/0456/P). This application proposes the replacement of a telephone kiosk with a singular kiosk incorporating digital advertising. This site is located approximately 90 metres east of the site. The application is pending consideration by the Council.
- // An application for the installation of a double-sided advertisement to an existing bus shelter opposite 12-16 Theobalds Road was refused by the Council (LPA Ref: 2016/2950/A). The application was refused due as it failed to preserve the setting of the Bloomsbury Conservation Area in which it is located and the several adjacent listed assets including a Grade II* listed park.
- // An application for the installation of a double-sided advertisement to an existing bus shelter opposite 14-16 Theobalds Road was refused by the Council (LPA Ref: 2015/5233/A). The application was refused due as it failed to preserve the setting of the Bloomsbury Conservation Area in which it is located and the several adjacent listed assets including a Grade II* listed park.
- // An application for the installation of a double-sided advertisement to an existing bus shelter opposite 12-16 Theobalds Road was withdrawn (LPA Ref: 2015/5217/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 scheme seeks advertisement consent for one portrait LED media screen with an associated logo box which will be positioned to face eastbound traffic travelling along Theobalds Road. The advertisement will sit within a bespoke and architecturally designed structure which will be slim and elegant in appearance and will be composed of steel elements and a plinth of composite stone with a Portland Stone effect. As the proposed design only features a single media screen it 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 reinterpretation of traditional wrought ironmongery found in the Borough. This bespoke artistry will be arranged in a lattice pattern and will enliven the rear of the structure and create a point of interest rather than having a blank elevation.

The siting of the structure has been carefully considered to ensure that it does not cause an obstruction to the public realm. In this regard, it has been located on the site of an existing kiosk whose mass already influences pedestrian movements to a greater extent than the slimline proposed structure will. The footprint of the structure will be minimal, ensuring encroachment onto the public realm is minimal.

The advertisement will be primarily 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). 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. Additionally, as the screen will be remotely controlled via broadband or wireless connections, it means 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.

The maximum luminance levels of the screen at night will not exceed 200 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, and 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 it 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.

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 sign shall not exceed 200 cd/sqm from dusk till dawn;
- // Any change in advertisement display shall be instantaneous;
- // The sign shall not display any moving, or apparently moving, images; and
- // The advertisement displayed 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.

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 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 elements.

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).

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-hoarding 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 commercial 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).

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.

In all regards the proposal complies with Council Policy. 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 application proposals comply with Policy CS5 and Policy DP26 in that the amenity of neighbouring properties has been fully considered and the orientation and illumination of the advertisements adjusted for minimal impact. The Holborn Hotel is located to the west of the site although due to the orientation of the building's windows, patrons of the hotel will remain unaffected by the development.

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).

In addition to the above, the proposals comply with Core Strategy Policy CS17 (Making Camden a Safer Place) part (e) of which seeks to promote safer streets. Investing in sites has a positive effect on promoting safer streets.

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-signaled routes". Policy DP21 (Development Connecting to the Highway Network) also stresses the importance of avoiding causing harm to highway safety in part (h).

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.

The 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 sufficiently separated from the Kingsway Conservation Area, the Bloomsbury Conservation Area and any listed assets 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.

Also, typical of a location of this kind, other forms of advertising are present in the immediate and surrounding vicinity and include advertisements on the existing kiosk, illuminated shop fascia signs, A-boards, advertising on bus shelters; which have also helped to establish the general location as acceptable in principle for advertising. The advertising structure will have a modern appearance and will be sculptural and elegant in its form which ensures that it has a minimal footprint and in turn minimises its impact on the public realm.

The proposal is a well-considered design that will incorporate high quality, robust materials that will fit in with the mixed palette of materials present in the surrounding buildings. This

ensures that the advertisement structure is in harmony with the surrounding built environment but also has its own identity. 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).

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 and public realm.

At present, the quality of the public realm is low, with the bulky kiosk prominent on the pavement. The proposals to replace the kiosk with a structure with a far smaller footprint will greatly improve the area for pedestrians. This proposal, combined with the application to consolidate the adjacent telephone kiosks ensures the amenity of the area will be improved dramatically.

In terms of impact on amenity, the proposed advertisements will be situated to the east a hotel although, due to the orientation of the hotel's windows, the advertisement would not have a detrimental impact on amenity. An office building is located immediately north of the site but it is worth noting that LED displays are only visible in a 140-degree arc, with the brightness and image clarity dropping off considerably beyond 90 degrees and thus the proposed advertisement would not impact on these units. Nevertheless, 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) and as such the illumination of the advertisement will not exceed 200 cd/sqm at nighttime. This will ensure 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. In addition, the hours of illumination can also be limited by condition if this is required.

Where a proposal is within a conservation area or close to listed buildings there is a requirement to consider whether the proposal preserves or enhances the conservation area or whether it might impact on the significance of a heritage asset. The site is located approximately 15 metres to the north of the Kingsway Conservation Area and approximately 60 metres to the north east of the Bloomsbury Conservation Area and is visible from approximately 6 statutorily listed buildings which are located between 60 metres and 100 metres to the west of the site.

According to the Kingsway Conservation Area Appraisal (KCAA) and the Bloomsbury Conservation Area Appraisal (BCAA) the western end of Theobald's Road, where the site is situated, is not included within a Conservation Area itself as it is more modern in appearance and character than the rest of the road. Since the 1940s the character of this end of the road has changed with the introduction of modern office buildings. The site is sufficiently separated from the Conservation Area and located within a robust commercial setting which is not sensitive to change. Furthermore, the introduction of the advertisement, due to its physical separation from the listed assets by Theobald's Road itself, the cross-junction and the distance ensures that it will not alter their individual significance, setting or appreciation of these heritage assets.

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.

As discussed above, 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.

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

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 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.

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 northern side of Theobalds Road and the advertising will be directed towards east-bound vehicular, pedestrian and cycle traffic. Theobalds Road has a speed limit of 30mph with a traffic-light controlled crossing approximately 30 metres to the east which ensures a reduced traffic speed. The advertisements will not obscure or sit behind these signals.

The relatively straightforward and uncomplicated nature of the approach along Theobalds Road towards the advertisement means that the proposal can be readily assimilated without

impacting on a driver's ability to control their vehicle and navigate safely through the area. The fact that the area is generally busy and that there is a lot of other visual stimuli will ensure that the advertisement will be assimilated as part of the general context of the area rather than as a standalone and dominant feature.

The footway at the application site is of a substantial width ensuring that the introduction of the structure will not adversely impact upon the safe movement of pedestrians. Additionally, and as mentioned previously, the existing kiosk already dictates the pedestrian flow of the immediate area. The replacement of the kiosk with the slimline structure will improve pedestrian flow along the pavement and its positioning away from the edge of the pavement ensures that it will not affect sightlines for pedestrians or vehicles. The wide nature of the footpath also ensures that the advertisement can be serviced safely and 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 the advertisement 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.

With regards to 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. The guidance explains that this changeover should limit the potential for drivers to view multiple adverts on the approach, although it is accepted that it is impossible to get this below two adverts as there is always the potential to arrive at the point of changeover (as there was with traditional adverts).

The approaches towards the advertisement are summarised below:

- // East-bound traffic travelling along Bloomsbury Way – The advertisement will be first visible at a distance of approximately 100 metres. The road at this point contains 3 lanes for traffic turning left, right or straight on. However, the key decision making point for drivers is located approximately 60 metres in advance of the junction where the advert is not visible and thus its introduction will have no effect on the drivers' decision making abilities. Once the advertisement is visible, due to the straight nature of the road the advertisement will be within the driver's cone of vision which ensures that it can be assimilated without impacting upon the driving task. This section is traffic-light controlled which ensures speeds are generally low. The advertisement will not sit behind the signal heads.
- // Northbound traffic travelling along Southampton Row – Other than local buses, traffic travelling north along the road cannot turn right onto Theobalds Road. For traffic allowed to turn right, i.e. buses, the advertisement will not be visible at the decision-making point and once committed, the advertisement will be within the driver's cone of vision. The junction is traffic light controlled which ensures low speeds.
- // Southbound traffic travelling along Southampton Row – Traffic can turn left into Theobalds Road or continue straight along Southampton Row. Drivers will only be able to view the advertisement once they have turned into Theobalds Road itself and thus the introduction of the advertisement will not impact on the key decision making point. Again, due to the traffic light controlled nature of the junction, traffic speeds will be low.

- // Traffic travelling east along Theobalds Road – Traffic can either continue straight along Theobalds Road or turn left onto Old Gloucester Street. Due to the slow-moving nature of the traffic, drivers will have plenty of time to assimilate the advertisement and it will not impede on the driving task.

A review of the available CrashMap data demonstrates that there were five 'serious' accidents and 15 'slight' accidents on the 100 metre approach to the site during the five-year period from 2012-16. An in-depth review of the data reveals that 3 of the 'serious' accidents and 9 of the 'slight' accidents involved traffic travelling away from the screen or traffic not visible from the screen and thus have been discounted.

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 advertisement is located on a relatively straight stretch of road with low traffic speeds;
- // The advertisement would be positioned so that it would not conflict with traffic signals or signs;
- // 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 screen 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 2 'serious' and 6 'slight' accidents of relevance in the vicinity of the advertisement over this period. Given the volume of traffic using this route this does not represent a high accident rate over a five-year period and the site should not be considered to be high risk.

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;
 - // 9053_PP_01 Site Location Plan;
 - // 9053_PP_02 Existing Site Plan;
 - // 9053_PP_03 Proposed Site Plan;
 - // 9053_PP_04 A-A Elevation;
 - // 9053_PP_05 B-B Elevation;
 - // 9053_PP_06 Specification Sheet;
 - // 9053_PP_07 Design Sheet;

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

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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