



**WILDSTONE  
PLANNING**

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

28<sup>th</sup> March 2017

## // Digital Advertisement – Land at Euston Circus

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 double-sided 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.

### Site Description and Planning History

The site is located at the junction of Hampstead Road and Euston Road adjacent to a Santander cycle hire node. The area is dominated by large scale buildings and roads, has extensive street lighting and is essentially commercial in character. The surrounding buildings are generally modern in appearance with limited consistency in terms of design, scale and materials. There is also existing advertising, including media screens, which is located at street level.

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The junction has been the subject of significant changes to the road infrastructure to provide improved services to pedestrians, cyclists and vehicular traffic. These works were partially funded by advertising which is located on the adjacent underpass.

The materials used on the sides and rear of the underpass advertising structure is consistent with the new cladding within the underpass. The materials were chosen to not only improve and modernise the appearance of the underpass but also to be hard wearing given the harsh urban setting. The selection of materials for this project was undertaken in consultation with the urban designers for the Euston Circus urban realm improvements and officers at Camden Council.

The site is located within the Euston Road Masterplan Area but is not located within a Conservation Area or an Area of Special Advertisement Control. There are no listed buildings in the immediate vicinity of the site.

There are large format advertising panels in the vicinity of the site comprising two digital advertisements above the eastern and western entrances to the Euston Underpass and a portrait P250 on the vent shaft immediately to the south of the underpass (Appendix 1). The advertisements on the underpass were installed in 2011 as part of works to upgrade the cladding in the underpass and to improve the public realm at ground level. The P250 advertisement has been in-situ for a number of years and benefits from deemed consent.

The existing screens measure 12 metres by 3.5 metres and their height means that they project above street level by approximately 2.7 metres. The advertising structures give the impression of two bookends, which define the Euston Circus public realm. It also means that the advertising is partially submerged below the prevailing ground level, which means it is not visible in the wider area other than in views east and west along Euston Road.

The screens were granted advertisement consent (LPA Ref: 2010/6613/A) and the associated recladding of the underpass was granted planning permission (LPA Ref: 2010/6615/P) on 1st July 2011. The consent was granted on a temporary three-year basis to allow the Council to assess the impact of the advertising on the area. The advertisement consent was renewed in 2014 under application 2014/4499/A.

The Officer's Report acknowledges that the "surrounding area is highly commercial and contains a range of large and tall buildings" and "there are a number of advertisements along the Euston Road corridor of varying design, scale and style". In terms of the proposed advertising, the Officer's Report states:

*"The proposed advertisement signs are not of a scale that the Council would normally encourage. However, it is acknowledged that the signs would be located above a vehicle-only part of the one of the busiest vehicle corridors in this part of London, at an exposed and expansive open road junction which is not typical of Camden's road network. These factors serve to mitigate the impact of the signs".*

The officer's report concluded that the advertising was far enough from any local building that it would not lead to the loss of visual amenity, daylight or sunlight nor would they be likely to result in light pollution to occupiers.

Since this consent was granted there have been two applications and appeals for advertising on the University College Hospital building on the corner of Tottenham Court Road and Euston Road. These applications comprised the following:

- // An application for a single display screen built into the building façade was refused on 22/10/13 and subsequently dismissed at appeal on 31/12/13 (LPA Ref: 2013/6400/A).

// An application for the installation of a curved media screen affixed to the Hospital façade was refused on 18/10/12 and subsequently dismissed at appeal on 11/07/13 (LPA Ref: 2012/4564/A).

The Inspector drew a clear distinction between the proposals for advertising on the Hospital and the advertising at street level concluding that the scale and elevated position of the proposed advertisement “would appear incongruous and excessively prominent and would dominate this important corner of the building” (Paragraph 7).

## Application Scheme

Wildstone’s Design Studio has worked with Camden’s Planning and Regeneration and Place Teams to design the advertising structure for the site. The land is unregistered but the applicant has initiated conversations with Transport for London who maintain the adjacent road.

The advertising will comprise two portrait media screens with a small logo box for the media owner. The screens will face both southbound and northbound traffic. The media screens will be made up of a series LED panels. Screen content will be controlled remotely allowing changeover between adverts without the need for operatives to visit the site.

The advertisements will be incorporated in to a bespoke architecturally designed structure, which will have an elegant and sculptural form. The structure has been designed to minimise the footprint and ensure that it has an elegant form. The proposed materials reference the materials that have been used in the public realm and the advertising structures on the underpass and comprise respectively a composite stone finish and copper finish metal cladding.

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 sited adjacent to TfL’s bike stand which already influences pedestrian movements.

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 screens 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 screens will be constructed in a manner that minimises disruption to the highway network. The foundations will be constructed on site but the advertising 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 commissioned 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. Maintenance issues will generally be resolved either remotely or without the need to physically access the media screens. Planned maintenance of the structure or media screens will be carried out at off peak times to minimise disruption to the highway network. A servicing and maintenance strategy will be prepared by the media owner that operates the site. 3

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; 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.

## 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-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 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).

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.

In all other 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 orientation of the display is away from residential properties.

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 cleaning up “grot spots” 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-signalled 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.

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 or close to any listed buildings 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. These buildings dominate and the highways infrastructure comprising Euston underpass the Euston Circus junction at street level dominate the visual and aural amenity of the area.

The area is predominantly commercial in character and as such is an appropriate location for advertising in principle. Any residential properties will be sufficiently separated from the proposed advertising so that it would not have any material impact on residential amenity. In any respect, the displays are fully controllable and will be set within guidance limits set by the ILP. The hours of illumination can also be limited by condition if this is required, although it is considered that in this instance the characteristics of the area would not justify such a restriction.

Typical of a location of this kind, other forms of advertising in the immediate and surrounding vicinity are present and include shop fascia signs, digital advertising on bus shelters, and large format advertising. The large format advertising has established the general location as acceptable in principle for such forms of advertising. It should be noted that the existing large format advertising will not be visible in the context of the proposed advertising due to its position and orientation.

The proposal is a well-considered design that will be constructed using high quality and robust materials, which reflect the materials used in the surrounding public realm. The advertising structure will have a modern appearance and will be sculptural and elegant in its form. The supporting structure minimises its footprint and therefore, its impact on the public realm.

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 to meet market requirements, whilst remaining in context and subordinate to the scale of the surrounding buildings and public realm.

The design and siting of advertising is dealt with at Paragraph 8.17 of Camden’s Planning Guidance (See above). Although this deals predominantly with advertising on buildings the proposed scheme has nonetheless, been assessed against these criteria;

- // Locations where they may prevent or significantly damage views or obscure light – The proposed advertisement is sufficiently separated from any buildings so that it would not damage views or obscure light;
- // 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 any protected views and will not obscure 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.

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

## Public Safety

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 approximately 20 metres from a junction;
- // The adverts would be positioned so that they 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 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 is sufficiently separated from the access to maintain so as not to effect sightlines or visibility splays. The size of the supporting structure has been minimised and the screen position so as not to obstruct views from vehicles;
- // Traffic accident data for the last five years has been analysed. This shows that there have been four slight accidents (three northbound and one southbound) in the vicinity of the advertisement. The accidents took place in locations where drivers would either not be able to see the advertisement or would have already assimilated the advertisement. Whilst any accident is regrettable, four slight accidents in five years represents a very low accident rate for a road of this type in this location. This data indicates that the road does not have a high accident rate and that it is an appropriate location for advertising.

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 structure in a predominantly commercial location adjacent to a busy strategic 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;
  - // 9052\_PP\_01 Site Location Plan;
  - // 9052\_PP\_02 Existing Site Plan;
  - // 9052\_PP\_03 Proposed Site Plan;
  - // 9052\_PP\_04 A-A Elevation;
  - // 9052\_PP\_05 B-B Elevation;
  - // 9052\_PP\_06 Specification Sheet;
  - // 9052\_PP\_07 Materials and Concept Development;
  - // 9052\_PP\_08 Design Sheet;
  - // 9052\_PP\_09 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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Encl Appendix 1 – Photographs of Surrounding Area

# // Appendix 1



Euston Underpass Advertisement (Eastern Entrance) and P250



Euston Underpass Advertisement (Western Entrance)



Euston Underpass Advertisements Rear Cladding Material

