



**WILDSTONE  
PLANNING**

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

28<sup>th</sup> March 2017

## // Digital Advertisement – Land Adj 100-110 Euston Road

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 portrait single-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 advertisement is proposed to be located on area of pavement adjacent to the Hotel Pullman at 100-110 Euston Road. The pavement is very wide at this point with limited pedestrian obstructions or clutter in the vicinity. Euston Road forms part of London's strategic road network and as such is a red route. The road comprises a dual carriageway and at this points is straight and uncomplicated.

The character of the area in the immediate vicinity comprises large scale modern buildings in a variety of commercial and cultural uses including hotels, retail, bars, restaurants and cafes and offices. The British Library is located to the east of the site. The scale of the

buildings is varied with the tallest buildings being between 10 and 16 storeys in height. There is no prevailing architectural style in terms of either the detailed design or materials in the immediate setting of the site. Materials include modern cladding systems, stone and brick. This gives the area an eclectic and diverse character.

The site is not within a Conservation Area although there are a number of listed buildings in the wider area including the British Library (Grade I), St Pancras Station and the former Midland Grand Hotel (Grade I), Camden Town Hall (Grade II) and the Rising Sun Public House (Grade II).

There is existing advertising in the area comprising digital bus shelters, small format digital advertising and fascia signs on commercial buildings.

The site is located within the Central London Area and the adjacent property is designated as Central London Frontage.

There is limited planning history in the surrounding area relating to large format advertising. The only relevant applications relate to temporary banner applications on buildings comprising the following:

- // A temporary (a period of a year) banner shroud (10m by 22m) on the town hall (LPA Ref: 2016/4603/A) – This application was refused and an appeal has been lodged but remains undetermined;
- // The display of a shroud advertisement for a temporary period (6 months) (LPA Ref: 2014/2537/A) – Application Granted
- // The display of a non-illuminated Olympic wall banner to the north elevation (Midland Road) for a temporary period (3 months) (2012/3072/A) - Granted

## 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 land is unregistered but the applicant has initiated conversations with Transport for London who maintain the adjacent road.

The advertising will comprise a single portrait media screen with a small logo box for the media owner, which will face west bound traffic. The media screen 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. 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 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 a simple and elegant form. Given the variety and lack of consistency in the materials used in buildings in the surrounding area it is proposed that the materials palette for the structure will comprise a dark powder coated metal combined with inset composite stone finish to match the Portland Stone used as the main building material for Camden's Town Hall. These materials will be hard wearing whilst giving the structure a high-quality finish.

The siting of the structure has been carefully considered to ensure that it minimises any obstruction to the public realm. The supporting structure has been located on the outside of the pavement nearest the road as this is the least intensely used part of the public footpath.

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

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

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

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

The 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 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.

## Public Art

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

Wildstone's design team has developed an artistic impression for the rear elevation using a laser cutting technique. This technique creates a pattern with three dimensional qualities which will enliven the rear façade 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. Conditioning this detail is an accepted manner by which the detail of art works can be controlled.

## Planning and Policy Considerations

## National Policy Overview

The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 is the legislative framework upon which the National Planning Policy Framework (NPPF) is based. Regulation 3 states that advertising should be controlled in the interest of amenity and public safety taking into account the provisions of the development plan, in so far as they are material, and any other relevant factors.

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

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

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

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

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

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

Further advice is included within the National Planning Practice Guidance (NPPG). The advice on amenity serves as a reminder to Local Authorities that large format advertising is acceptable in principle in the right locations, and states:

*"...In assessing amenity, the local planning authority would always consider the local characteristics of the neighbourhood: for example, if the locality where the advertisement is to be displayed has important scenic, historic, architectural or cultural features, the local planning authority would consider whether it is in scale and in keeping with these features. This might mean that a large poster-boarding would be refused where it would dominate a group of listed buildings, but would be permitted in an industrial or commercial area of a major city (where there are large buildings and main highways) where the advertisement would not adversely affect the visual amenity of the neighbourhood of the site." (Paragraph 79)*

Considering the proposal against the above it is entirely appropriate for an advertisement to be located in a town centre location such as this, where the opportunity to significantly impact on visual amenity is very limited.

## Local Policy Considerations

Local policies alone cannot be used to determine an application for advertisement consent, but are a material consideration in assessing amenity and public safety impacts.

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

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).

The site is located within the Somers Town Neighbourhood Forum Area. The Neighbourhood Area Plan was adopted in February 2015. The Plan does not have any specific policies relating to advertising other than for temporary hoardings.

## 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. 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. The commercial buildings and the highways infrastructure dominate the visual and aural amenity of the area.

In this instance the proposal site is not in a conservation area although the King's Cross St Pancras and Bloomsbury Conservation Areas are located 120m to the east and 80m to the south respectively. There are also buildings separating the site from the Bloomsbury Conservation Area. It is considered that the site is sufficiently separated in order that the proposed advert would not affect the setting or significance of either conservation area.

There are a few listed buildings in the wider area which is to be expected in a central area of London. The listed buildings are physically separated from the application site and as such the proposed advertisement would not affect key views of the listed buildings. Euston Road has a significant impact on the setting of these listed buildings as it visually limits and restricts views of the principle elevations fronting the road. The proposed advert will be located such that it would not affect the setting or the understanding of the significance of any of the listed buildings in the surrounding area in terms of their architectural or historic interest.

The area is predominantly commercial in character and as such is an appropriate location for advertising in principle. There are no residential properties which would be impacted by the proposed advert. In terms of the hotel, the advertising structure has been positioned so that it aligns with the stair core rather than any of the rooms so as to maintain outlook and ensure there is no material impact on daylight to these rooms. The displays are fully controllable and will be set within guidance limits set by the ILP for a city centre location such as this. 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 illuminated shop fascia signs and advertising on bus shelters. There is also large format advertising on Euston Road which have also helped to establish this strategic road as an acceptable location for advertising in principle subject to the detailed design and siting.

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. 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). 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 scale is deemed to be entirely appropriate given the width of the pavement and scale and height of the surrounding buildings.

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 each of the criteria;

- // Locations where they may prevent or significantly damage views or obscure light – The proposed advertisement is sufficiently separated from the adjacent building at 100-110 Euston Road so that it would not damage views or obscure light. It should also be noted that the building is not of any architectural merit;
- // 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. The location of the advert is similar to other free-standing advertisements in London;
- // 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 has been situated so that is in line with the building's core and therefore it will not obscure any architectural features; and
- // On side walls where they would be unduly dominant - The proposed advert is free-standing within 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 and it would not impact on the setting or significance of any heritage assets in the wider area.

## Public Safety

Digital advertisements are now a common sight alongside roads in major cities and as such are not an “unusual” distraction for drivers. 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 located and designed to be readily visible and will attract attention

without causing a dangerous distraction to drivers, pedestrians or cyclists. Euston Road is straight and relatively uncomplicated road and traffic speeds are often slow due to the volume of traffic and the number of traffic signals.

The proposed advertisement is located on a four arm off-set traffic controlled junction on Euston Road with Ossulston Road and Mabledon Place. The advert is positioned so that it does not interfere with the sight lines of either the Chalton Street or Ossulston Road junctions with Euston Road. The west bound decision making points for the junction take place before the advertisement would become readily visible to road users. The advert conflict with any traffic signal at the junction.

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 adjacent to traffic controlled 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 junctions 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 seven slight and one serious accident in the vicinity of the advertisement. Three of the accidents are on the eastbound carriageway which are not relevant as the advert would not be visible. Five accidents are on the westbound carriageway of which three took place after the point where the advertisement would be visible. Only two accidents are therefore, relevant. Whilst any accident is regrettable, two accidents in five years on the approach to the proposed advertisement represents a very low accident rate for a road of this type in this location. This data indicates that the road and junction does not have a high accident rate and that it is not a complicated or dangerous location which would be inappropriate 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 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;
  - // 9054\_PP\_01 Site Location Plan;
  - // 9054\_PP\_02 Existing Site Plan;
  - // 9054\_PP\_03 Proposed Site Plan;
  - // 9054\_PP\_04 A-A Elevation;
  - // 9054\_PP\_05 B-B Elevation;
  - // 9054\_PP\_06 Specification Sheet;
  - // 9054\_PP\_07 Design Sheet;
  - // 9054\_PP\_08 Artist's Impression

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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