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**From:** McLaughlin Gavin [REDACTED]  
**Sent:** 22 May 2017 14:18  
**To:** Whittingham, Gideon; Planning  
**Subject:** 2017/1268/A - TfL response

Dear Gideon,

**2017/1268/A**

**Land adjacent to 243-245 High Holborn London**

**Installation of digital advertisement screen (Dimensions: 3m height x 2m width x 0.4m depth) and associated stand (Dimensions: 6.3m height x 0.4m width x 0.4m depth).**

Thanks for consulting TfL on this planning application.

TfL Planning notes the comments already given by the London Underground Infrastructure Protection team.

TfL Planning reminds the Council that they should consult [boroughplanning@tfl.gov.uk](mailto:boroughplanning@tfl.gov.uk) for all applications with strategic transport planning implications, for example those on or close to the Transport for London Road Network (TLRN) or Strategic Road Network (SRN) or which impact on TfL assets, services or infrastructure.

TfL Planning has the following comments:

- This proposed advertising structure is very close to a bus stop and pedestrian crossings. The exact distance between the structure and the crossings is not specified in the drawings. In addition the drawings do not show how introducing the structure would affect footway width on Shaftesbury Avenue. TfL seeks clarification on these impacts.
- TfL reminds the applicant and Council that the London Plan favours decluttering and simplifying the streetscape wherever possible (see policy 6.10) and this is also prioritised in TfL Streetscape Guidance (available from <https://tfl.gov.uk/corporate/publications-and-reports/streets-toolkit>)
- Detailed road safety and driver distraction analysis has not been provided to support this advertising proposal. TfL Guidance for Digital Roadside Advertising and Proposed Best Practice (available from <http://planning.islington.gov.uk/NorthgatePublicDocs/00418387.pdf>) states clearly that Adverts close to pedestrian crossings, low bridges or schools require detailed analysis to ensure that no conflict occurs (4.1).
- The document also contains a standard risk assessment process which involves a Site Visit and Desk Based Assessment of the potential advert by two qualified safety assessors. The form for this assessment (the 'Advertising Safety Guidance Form') is included in Appendix A of the document.
- Completion of this form requires input of the accident record for the proposed advert location in the 36 months prior to the Site Visit at Section D. TfL Planning notes this has been mentioned by local objectors to the planning application due to the close proximity of the pedestrian crossing.
- The assessment produces a recommendation by appropriately qualified professionals on whether the advert proposal should be accepted or rejected on highway safety grounds. Alternatively assessors may recommend a full Road Safety Audit (for further information on how to commission or carry one out, see <http://content.tfl.gov.uk/tfl-road-safety-audit-procedure-may-2014-sqa-0170.pdf>)
- This approach is used by TfL for similar advertising proposals on our own land and the TLRN. Therefore we would encourage the Council and applicant to take a similarly robust approach to assessing the highway safety impacts of this proposal.

- Please feel free to contact me should you require any further clarification or information on the above comments.
- To summarise and conclude, TfL Planning objects to the application currently, as more detailed and robust analysis of the road safety impacts of the proposed advertisement should be carried out.

Thanks,

**Gavin McLaughlin**  
**Planner, TfL Planning, Transport for London**  
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For more information regarding the TfL Borough Planning team and TfL's *Transport Assessment Best Practice Guidance* please visit <https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guidance> and for pre-application advice please visit <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-applications/pre-application-advice>.

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