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The logo for SMPlanning, featuring the text "SMPlanning" in a white, sans-serif font on a dark rectangular background.

80-83 Long Lane,
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Via Planning Portal Only

9th May 2018

**Display of digital advertisement panel
176 Camden High Street, London, NW1 8QL**

The following is produced to accompany the application for advertisement consent at the above address: -

- Application form (advertisement consent)
- Existing and Proposed Elevations and Sections
- Design and Access Statement
- Road Safety Assessment

Proposal

The proposal seeks consent for a digital media screen, located at second floor level of the existing building. At present the existing building is home to HSBC at ground floor level and is within the wider ownership of Transport for London as part of the adjoining Camden Town Underground Station.

The screen will be constructed to incorporate 'The Breath' which is an innovative environmental technology that can be used to treat and purify polluted air in cities. The technology is comprised of a multi-layered fabric that separates and absorbs harmful airborne pollutants.

The screen is intended to target pedestrian and vehicular traffic. 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, and the hours of illumination can also be limited by condition if required.

Legislative Provision

Regulation 3 of The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (as amended) requires that local planning authorities control the display of advertisements in the interests 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.

Therefore, unless the nature of the advertisement is in itself harmful to amenity or public safety, consent should not be refused.

Relevant Planning Policy – Planning Assessment

The London Plan

The current London Plan identifies the importance of tackling air pollution and improving air quality to London's development and the health and wellbeing of its people. It states at Policy 7.14 that development proposals should be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality. This is consolidated in the New London Plan which states, under Policy SI1, that London's air quality should be significantly improved and that development proposals should make provision to address local problems of air quality.

Camden Local Plan 2017 – Policy D4 (Advertisements)

This is the key local policy of relevance and requires advertisements to 'preserve or enhance' the character of their setting and host building. The policy requires advertisements to respect the form, fabric, design and scale of their setting and host building – requiring them to be of the highest standard of design, material, and detail. The policy has several criteria from *a* to *g* which require consideration and will be addressed below. More specific guidance relating to digital advertisements is contained within the Camden Planning Guidance which is analysed following commentary relating to policy D4.

Criteria a: The Council will support advertisements that preserve the character and amenity of the area

The advertising space has been specifically designed to correspond with the building fabric, utilising a curved design which sits comfortably with the original building architecture. The existing building is unusual in that it has a blank elevation at second floor level with no windows or openings. The advertisement would respond positively with the buildings architectural setting and natural shape, sitting respectfully within the reveals which exist at second floor level.

The accompanying design and access statement illustrate the variety and diversity of advertisements within Camden Town, and these range from traditional hoardings, painted walls, 3d models and digital displays on bus shelters, telephone kiosks and wall mounted displays all of which add to the colour and flavour of the area.

The proposal would accord with criteria *a* of the policy by preserving the character and amenity of the area.

Criteria b. The Council will support advertisements that preserve or enhance heritage assets and conservation areas.

Whilst there are no listed buildings nearby, the site is within the Camden Town Conservation Area. Given the above points surrounding the architectural merit of the advertisement, and how it fits comfortably within the building fabric and the general character and range of advertisements locally, the proposals are considered to accord with criteria *b* of the policy which requires advertisements to preserve or enhance heritage assets and conservation areas.

The second strand of the policy, lists criteria that Camden will 'resist' in advertisements.

Criteria c: The Council will resist advertisements that contribute to an unsightly proliferation of signage in the area

Signage exists in the immediate and wider locale as would be expected in an urban location. However, the surroundings maintain an appropriate ratio of built development to advertisements and the proposal would not therefore lead to an unsightly proliferation of signage in the area.

Criteria d. The Council will resist advertisements that contribute to street clutter in the public realm

The proposed screen will be facilitated by an existing structure and therefore additional street clutter will not be created by the proposal.

Criteria e. The Council will resist advertisements that cause light pollution to nearby residential properties or wildlife habitats

The application site is located within an urban area, characterised by a mix and range of uses. There are no known areas of wildlife importance and while there are residential properties in the locale, they do not form the dominant use class. Light pollution, in the context of these surroundings, is not therefore likely or even possible.

Criteria f. The Council will resist advertisements that have flashing illuminated elements

While it is acknowledged that flashing illuminated signage has the potential to impact on amenity and public safety, the context of the surroundings ensures that those impacts are unlikely to be demonstrably noticed in this location. However, flashing illuminated elements can nevertheless be controlled by condition and the applicant would be willing to accept such controls that not only limit the level of illumination but the type i.e. no flashing elements. Conditions limiting such matters would be justified where any harm is identified by the elements to be controlled.

Criteria g. The Council will resist advertisements that impact upon public safety

The accompanying 'Road Safety Assessment' concludes there is no impact on public or road safety but please also refer to the comments above in relation to the imposition of planning conditions.

The later part of the policy is more prescriptive and seeks to resist advertisement on shopfronts that are above fascia level or ground floor level, except in 'exceptional circumstances'. Whilst the presumption against high level advertisements as the norm is understood, this policy is not read as a blanket ban on all such proposals which should be considered on their planning merits. In this case, it has been demonstrated how the advertisement would sit comfortably within its context and local character, according with the various strands of policy A4, and as such should be granted express consent.

Camden Planning Guidance Note 2 – Advertisements

The Camden Planning Guidance provides more clarity about the application of policy D4 and provides a separate category in relating to 'Digital Advertisements' – Pages 7-8.

The CPG states that proposals for digital advertisements should adhere to the best practice guidance set out in the Transport for London Guidance for Digital Roadside Advertising and Proposed Best Practice (March 2003).

This best practice guidance sets out detailed considerations and requirements including:

- Siting of adverts including proximity to traffic signals, hazards, and longitudinal spacing;
- Position and orientation to the carriageway;
- Message duration, transitions, and sequencing; and
- Lighting levels.

The proposal accords with all these principles, and this is further analysed in the Road Safety Audit accompanying the application.

The guidance states further that the Council **support** the development of digital signboards provided they meet the criteria set out in Local Plan Policy D4 on advertisements, the guidance set out in this document, TfL best practice, and where they are located in a suitable location. The majority has been analysed above, however further guidance on what the CPG sees as appropriate locations are noted below.

The guidance states, that digital adverts are not suitable on sites (i) within predominantly residential areas, (ii) with a uniform heritage character, (iii) within conservation areas, and (iv) with large numbers of listed buildings. Dealing with each point in turn;

(i) Digital adverts are not suitable on sites within predominantly residential areas

The site is not located in an area that is predominantly residential. The area is of course characterised by an element of residential use but the overriding character is one of an urban landscape.

(ii/iii/iv) Digital adverts are not suitable on sites with a uniform heritage character/conservation areas/areas with a large number of listed buildings

The site does not present a uniform heritage character and there are not a large number of listed buildings in the immediate locale. The site is located within a conservation area. However, as the regulations to control advertisements require that decisions are made only in the interests of amenity and public safety, this guidance cannot alone be decisive. It must allow for each development proposal to be considered on its merits and as noted above in the character and design analysis the proposals would sit comfortably within this particular part of the conservation area, and Camden Town generally.

Turning to factors for suitable digital advertisement locations, the proposals state there should be in the following areas:

- In predominantly commercial areas,
- Along major roads carrying high levels of traffic, and

- In areas with larger buildings where signage can be integrated into the architecture.

The proposals comply with all the above, and as a result point to this as an ideal location for digital advertising.

Summary

The proposal is of high quality and located in a commercial area appropriate for an advertisement of this scale and design. 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.

If there are any questions or required points of clarification, please contact me as soon as possible.

Yours sincerely

SM Planning