

<b>Delegated Report</b>			<b>Expiry Date:</b>	<b>16/05/2018</b>
<b>Officer</b>			<b>Application Number(s)</b>	
Leela Muthoora			2018/1115/A	
<b>Application Address</b>			<b>Application Type:</b>	
19-20 High Holborn London WC1V 6BS			Advertisement Consent	
<b>1<sup>st</sup> Signature</b>	<b>2<sup>nd</sup> Signature (If refusal)</b>	<b>Conservation</b>	<b>Recommendation(s):</b>	
			Refuse Advertisement Consent	
<b>Proposal(s)</b>				
Temporary display of externally illuminated shroud with a 1:1 image of the building and advertisement measuring approximately 9m x 14.5m on High Holborn elevation from April 2018 to May 2019.				
<b>Consultations</b>				
<b>Summary of consultation responses:</b>		No consultation responses received		
<b>Site Description</b>				
<p>The application site comprises of 19-20 High Holborn, a seven-storey office building with retail units at ground floor level and two flats at 6<sup>th</sup> floor level, known as Gray's Inn Chambers, located on the north side of High Holborn. The site includes the neighbouring five storey Grade II listed Gatehouse (Gray's Inn Gate) located at 21 High Holborn with an ground level pedestrian and vehicle access to (Gray's Inn) South Square to the rear and an access route linking High Holborn and Gray's Inn Road to the rear of numbers 4 to 21 High Holborn. The site is within Bloomsbury Conservation Area.</p>				
<b>Relevant History</b>				
<p>This site  <b>2016/6785/P - Granted</b> Subject to a Section 106 Legal Agreement <b>03/08/2017</b>  Refurbishment, extension and part change of use of existing building to provide a mixture of uses including retail, office and ancillary uses, involving roof, rear and basement extensions comprising 621 sq m (GEA) of additional floorspace and associated plant. Two existing residential units to be provided at 12 Gray's Inn Square as part of a land use swap.</p> <p><b>2017/7048/A - Withdrawn 21/02/2018</b>  Temporary display of a shroud and non-illuminated advertisement to scaffold fronting High Holborn from 02/04/2018 until 31/07/2019.</p> <p>Nearby sites  <b>2013/4086/A - 150 Holborn – Granted 24/09/2013</b>  Display of a non-illuminated advertisement shroud (measuring 10m x 20m) on scaffolding between second and fourth floor on the south elevation for temporary period until 1 September 2015.</p> <p><b>2013/7299/A - 150 Holborn - Refused 04/02/2014 – Appeal dismissed 08/07/2014</b>  Addition of external lighting to shroud of 1:1 image of building facade approved under permission 2013/4086/A dated 24/09/2013.</p> <p><b>2016/7108/A - 262 High Holborn – Granted 13/03/2017</b>  Temporary display of a non-illuminated shroud over the entire building with 1:1 image of existing</p>				

building and non-illuminated advertisement at first and second floor level on the front façade until 15/03/2018.

**2018/0378/A - 262 High Holborn – Granted 22/02/2018**

Temporary display of a non-illuminated shroud over the entire building with 1:1 image of existing building and non-illuminated advertisement at first and second floor level on the front façade until 09/10/2018.

**Relevant policies**

**National Planning Policy Framework 2012**

**Town and Country Planning (Control of Advertisements) (England) Regulations 2007**

**London Plan 2011**

**Camden Local Plan Policies**

A1 - Managing the impact of development

D1 - Design

D2 - Heritage

D4 - Advertisements

T1 - Transport

**Camden Planning Guidance – Advertisements March 2018**

**Bloomsbury Conservation Area Appraisal and Management Strategy 2011 (Sub-Area 8)  
(paragraphs 5.49 and 5.50)**

**Planning Enforcement Initiative to remove unsightly advertisement hoardings in the Borough**

## Assessment

### 1. Background

In August 2017, planning permission was granted under 2016/6785/P for roof, rear and basement extensions in connection with the change of use, see planning history section above. The implementation of this development has led to this application for advertisement consent for the display of a scaffold shroud with an inset externally illuminated advertising panel.

### 2. Proposal

2.1 The application relates to a temporary scaffold screening printed on fabric mesh containing a 1:1 replica image of the building façade with commercial advertisement approximately 9m by 14.5m. Five floodlights would externally illuminate the front elevation by means of metal-halide lamps fixed to the scaffold poles at fourth floor level each with illumination levels of 300 cd/m. The display would be for a temporary period until May 2019, while external works are being carried out in the building.

2.2 The application form and proposed drawing states the size of the proposed advertising panel as 9m high by 14.5m wide making the area of the advertisement 130.5sqm and the total area of the shroud elevation 367.5sqm. When measured according to the scale bar on the drawing, the dimensions are approximately 7.6m x 12.2m making the area of the advertisement approximately 93.8sqm with the total area of the shroud elevation 252.7sqm. Despite some inaccuracy of the dimensions on the drawings, in either case the advert would form approximately 37% of the overall elevation.

#### 2.3 Revisions

As the initial proposal was contrary to Council guidance, officer advice was to reduce the size of the advertisement to 10% of the overall display, re-position the panel to allow a full image of the listed building and remove the external illumination. A revision was made to this effect; however, this was subsequently revised and replaced with the original proposal by the applicant.

### 3. Planning Issues

The Town and Country Planning (Control of Advertisements) Regulations 2007 permits the Council to only consider amenity and public safety matters in determining advertisement consent applications. Therefore, the main planning considerations are the following:

- 3.1 The impact of the proposed signage on the character and appearance of the building and the surrounding area and residential amenity;
- 3.2 The impact of the proposed signage on public safety.

### 4. Amenity

4.1 Camden Local Plan states that advertisements must preserve or enhance the character of their setting and host building, as well as respect the form, fabric, design and scale of their host building and setting. Camden Planning Guidance states that shrouds on scaffolding will only be permitted where the:

- scaffolding covers the entire elevation of the building and depicts a true 1:1 image of the completed building;
- shroud does not exceed the height and length of the completed building (the 1:1 image should also not be extended where scaffolding stretches around a corner); and the
- advertisement on the shroud covers no more than 10% (on listed buildings or in conservation areas) of the shroud. The advertisement must also respect the architectural form and scale of the host building.

4.2 Whilst it is accepted that scaffold shroud advertisements can help to shield unsightly construction work, they can also create a conflict with the surrounding environment and the street scene due to their scale and size. The proposal does not comply with the guidance in that it would be much greater than 10% of the elevation. The advertisement would be

positioned from the first to third floor levels and extend close to the full width of the shroud. Little of the printed image of the building would be discernible and the height of the advertisement would dwarf the listed building. By obscuring the replica image of the listed building, the advert would draw attention away and detract from the special interest and importance of this building, which also allows access to the rear of the site.

4.3 The illumination of the advertisement would exaggerate its prominence, making it a visually dominant feature in the night-time street scene. Whilst the down-lighters would be a discrete size and level of illumination low, the size and elevated position would form a dominant and distracting feature within the area that would unacceptably harm the character and appearance of the street scene and the Bloomsbury Conservation Area.

4.4 It is considered that the size and siting of the proposal would be such that it would be unduly dominant, and cannot be considered as an appropriate feature to this prominent elevation. Due to its size, location and illumination it is considered that the proposed advertisement would be highly visible in local and longer views in both east and west directions along High Holborn. As a result, the proposal would be unduly dominant and detract from the visual amenity and would fail to preserve or enhance the character and appearance of the Bloomsbury Conservation Area and be harmful to the setting of the Grade II listed building.

4.5 Whilst two scaffold shroud advertisements were granted temporary consent at 150 High Holborn & 262 High Holborn near to the application site. Neither included illumination and both proposals were less than 10% of the overall elevation image.

4.6 The buildings opposite (within the City of London) are largely commercial and should there be residential occupiers on the upper floors, as there are in neighbouring sites, the light pollution caused by the illuminated sign would be harmful to the residential amenity and therefore unacceptable due to its location and method of illumination.

## **5. Public Safety**

5.1 It is accepted that advertisements are intended to draw the attention of passers-by, whether they are drivers, cyclists or pedestrians. The vital consideration is whether an advertisement is likely to be so distracting, or so confusing, that it creates a hazard to, or endangers, people in the vicinity who are taking reasonable care. Whilst the proposed shroud and advert would be large, and uncommon in that respect, it is unlikely to be considered hazardous to road users.

## **6. Conclusion**

6.1 The proposed externally illuminated advertisement by reason of its size, siting and method of illumination would have a detrimental impact on the visual amenity of the locality, failing to preserve and enhance the character and appearance of the Bloomsbury Conservation Area and harming the setting of the Grade II listed building, contrary to policies A1 (Managing the impact of development), D2 (Heritage) and D4 (Advertisements) of the London Borough of Camden Local Plan and the application is therefore recommended for refusal.

## **7. Recommendation – Refuse Advertisement Consent**