

<b>Delegated Report</b>		<b>Analysis sheet</b>	<b>Expiry Date:</b>	<b>10/07/2018</b>
		N/A / attached	<b>Consultation Expiry Date:</b>	<b>14.6.18</b>
<b>Officer</b>			<b>Application Number(s)</b>	
Charles Thuaire			2018/2165/A	
<b>Application Address</b>			<b>Drawing Numbers</b>	
Kings Cross Square Kings Cross Station Euston Road London N1C 4TB			See decision notice	
<b>PO 3/4</b>	<b>Area Team Signature</b>	<b>C&amp;UD</b>	<b>Authorised Officer Signature</b>	
<b>Proposal(s)</b>				
Display of two internally illuminated digital media screens (4m high x 27m wide and 6.5m high x 60m wide) on circular and oval ventilation shafts respectively				
<b>Recommendation(s):</b>	<b>Refuse advertisement consent</b>			
<b>Application Type:</b>	<b>Advertisement Consent</b>			

<b>Conditions or Reasons for Refusal:</b>	<b>Refer to Draft Decision Notice</b>					
<b>Informatives:</b>						
<b>Consultations</b>						
<b>Adjoining Occupiers:</b>	No. notified	<b>00</b>	No. of responses	<b>07</b>	No. of objections	<b>07</b>
<b>Summary of consultation responses:</b>	<p>Press advert and site notice displayed 23.5.18 to 14.6.18</p> <p><u>Objections from 7 individuals</u>, including users of square and residents in Argyle Square area and above St Pancras station-</p> <p>shaft structures are very visible within Kings Cross Square and from surroundings including Argyle Square; great effort were made to have them sympathetically designed to neither draw attention to them nor distract from the beautiful stations; shaft structures are well detailed, covering them in illuminated advertising will have a significant negative visual impact on the public square and on Grade 1 listed St Pancras and Kings Cross stations; also will create advertising clutter where there is enough visual clutter already; size of these screens would create an enormous visual eyesore within magnificent vista on square; large flashing illuminated screens is unacceptable and will create noise and light pollution to neighbouring flats such as St Pancras Chambers; Square's visual calm and simplicity derive from the simple order and dramatic symmetry of the entrance elevation of Kings Cross Station and proposed advertisements constantly moving and distracting would significantly downgrade the visual environment of the Square; funds can be raised in another way that are not detrimental to the square and neighbours.</p>					
<b>CAAC/Local groups* comments:</b> <small>*Please Specify</small>	<p><u>Kings Cross CAAC</u>- strongly object to most outrageous development ever received; immense efforts made in restoring KX station and designing scheme for new square; 'proposal to wrap these two carefully designed shafts in gaudy primrose-yellow would normally be seen as an April Fool's Day joke'; 'proposed scheme will do everything possible to counter years of careful work by culturally sensitive experts and by Camden planners'; impact of proposed pollution-absorbent backing of the screens will be wholly insignificant and is merely a gimmick designed to distract.</p> <p><u>Bloomsbury CAAC</u> strongly object- 'the new forecourt to Kings Cross is an immense improvement on the previous extension which was blighted by advertisements and general tat. A great deal of effort has gone into the design and construction of the vent towers to make them as subdued and 'polite' as possible so as not to distract from the superb listed building behind them. The proposed illuminated signs would completely reverse all of this and be highly prominent - a complete distraction from the listed station building to which they should be subservient (as are the vents currently)'.</p> <p><u>Friends of Argyle Square</u>- object- 'shaft structure closes a vista from one side of Argyle Square down Belgrove Street, and covering it in a back illuminated advertising hoarding will have a significant detrimental effect on half of the Square; it would also seriously detract from the setting of two prominent Grade 1 Listed buildings adjacent to a public square'.</p> <p><u>Bloomsbury Residents Action Group</u> (representing streets south of the Euston Road)- object- vents were designed to respond sympathetically to</p>					

the setting of two Grade I listed buildings and to permit large scale digital advertising in this location is completely inappropriate; 'by reason of size, scale and prominent location, the proposed digital screens would be an obtrusive addition which would be harmful to the visual amenity of the streetscene, the character and appearance of the conservation area and the setting of the surrounding listed buildings.'

Greater London Industrial Archaeological Society- object- scheme is totally unacceptable; architects and Council applied a great deal of thought to the simple forms and dark grey, finned texturing of these towers, so as to tone down their intrusive size and blend them with the square's grey granite paving. The scheme would destroy all that'.

St Pancras Chambers Residents Association (representing residents in flats above station)- object- 'not clear that these proposed advertising signs are an improvement. In our collective view they would not be in keeping with or sympathetic to the Kings Cross and St Pancras frontages. Particular areas of concern include the level of lighting which they will generate and the degree of likely continuity of use'.

HS1 (who manage and operate St Pancras International station)- object- completely inappropriate in this location within Kings Cross conservation area and in close proximity of two Grade I listed buildings and a range of Grade II listed buildings, would seriously detract from the setting of these, add visual clutter to public realm and interrupt views across Square.

Historic England- agree with HS1 comments above; 'proposed signs cause a high degree of harm to the setting and significance of the grade I listed St. Pancras and King's Cross Stations, the grade II Great Northern Hotel and the King's Cross Conservation Area. We do not consider there to be any public benefits arising from the proposals that would outweigh the proposed harm, in accordance with policies 133 or 134 of the National Planning Policy Framework'.

Transport for London- make comments on process of installing adverts to ensure no impact on public highway and to request conditions on advert displays and illumination if consent is granted.

London Underground- no objection.

## Site Description

Kings Cross Square in front of the station was laid out to replace the old southern concourse canopy, following approval for a landscaping scheme- see history. This new landscaped square includes- 2 reconfigured ventilation shafts with 2 small retail kiosks included, 2 reconfigured staircase canopies, a series of planting beds with integral seating on the western side, a series of benches and trees plus a Henry Moore statue on the eastern side alongside bus stops, and a wide open space of striped granite paving in the middle containing some benches and lampposts.

The Square adjoins Grade 1 listed Kings Cross and St Pancras stations and is within Kings Cross conservation area.

## Relevant History

16.1.12- 2011/4782/P- approval granted for Details of hard and soft landscaping, lighting, Exit and Southeast Stair Canopies (adjacent to station facade), incorporating alterations to existing LUL structures and provision of additional retail kiosks, all relating to provision of new southern square between original station and Euston Road, pursuant to conditions 3, 17, 37a and 37d of planning

permission 2006/3387/P granted 09/11/2007 for alterations, refurbishment and extensions to King's Cross Station to provide for new operational railway purposes and passenger facilities (including demolition of southern concourse and landscaping of new southern square).

## Relevant policies

### London Borough of Camden Local Plan 2017.

Policy A1 Managing the impact of development

Policy D1 Design

Policy D2 Heritage

Policy D4 Advertisements

### Camden Planning Guidance

CPG1 Design (section 8 on advertisements)

CPG Advertisements (March 2018)

### London Plan 2016

### NPPF 2012

## Assessment

### 1. Proposal-

1.1 The proposal involves the installation of two internally illuminated digital media screens on the circular and oval ventilation shafts within the square- that on the round shaft in the middle of the square will be 4m high x 27m wide, that on the oval ('egg') shaft on the western side adjoining St Pancras Station will be 6.5m high x 60m wide. Maximum height of the letters and symbols on the screens will be 60cm. The round shaft will be almost entirely covered by the screen at upper level and around its full northern facade facing the station (ie. excluding those parts above and below the canopy enclosure); the oval shaft will be entirely covered by the screen at upper level above the base plinth containing the retail kiosk, so that it is wrap-around panel facing all sides.

1.2 They will be LED panels set within steel support frames attached to the facades of the 2 vent shafts. The media screens are intended to target pedestrian and vehicular traffic and would be custom built to follow the exact curvature of the structures. They will be internally illuminated with a max of 300 cd/m illuminance levels and will be static, not flashing. The screens would be remotely controlled via broadband or wireless connections, which will mean that images can be changed without the need to visit the site.

1.3 The screens will 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.

### 2. Policy and Issues-

2.1. 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 only in the interests of amenity and public safety. The former can cover the issue of visual and residential amenity; the latter covers the issue of road and pedestrian safety.

2.2 Policy D4 of the Local Plan states that-

'The Council will require advertisements to preserve or enhance the character of their setting and host building. Advertisements must respect the form, fabric, design and scale of their setting and host building and be of the highest standard of design, material and detail.

We will support advertisements that:

- a. preserve the character and amenity of the area; and
- b. preserve or enhance heritage assets and conservation areas.

We will resist advertisements that:

- c. contribute to an unsightly proliferation of signage in the area;

- d. contribute to street clutter in the public realm;
- e. cause light pollution to nearby residential properties or wildlife habitats;
- f. have flashing illuminated elements; or
- g. impact upon public safety.'

2.3 Camden Planning Guidance (CPG) provides more clarity about the application of policy D4 and provides a separate category in relation to 'Digital Advertisements' on pages 8-9. Para 1.37 states that 'the Council support the development of digital signboards provided they meet the criteria set out in Local Plan Policy D4 on advertisements'. Para 1.38 states that digital advertisements are not suitable for locating in some areas. Factors which make a location less suitable for digital billboards include locations within conservation areas, within predominantly residential areas, with a uniform heritage character, near listed buildings, and where the advertisement could become the most prominent feature of the street scene.

2.4 The key issue here, discussed in section 3 below, is the impact on the appearance of the square and its component structures, on the character and appearance of the conservation areas, and on the setting of adjoining listed buildings. The issues of residential amenity and public safety are discussed in sections 4 and 5 below and the impact is concluded not to be harmful.

### 3. Design and heritage-

3.1 The square was carefully designed as a new landscaped space in front of the station after a high profile competition as part of the Kings Cross redevelopment programme. The intention was to remove redundant and ugly existing structures, create a new 'world class' square worthy of its setting in front of a Grade 1 listed station, and reveal the station's facade with minimal visual clutter in front. The square contains distinct groups of structures (canopies and shafts), seating and planting, an area for public art (presently occupied by the Henry Moore statue) and an open piazza with lighting columns and information boards. The location of these various elements was carefully designed to ensure smooth pedestrian throughflows. The paving, structures and street furniture are all coordinated in materials and design. The award-winning Square was carefully conceived and designed as a set piece and architectural entity fronting the two Grade 1 listed stations, as a result of a design competition some years ago. The various structures and surfaces have a common design idiom with clean uncluttered lines and uniform materials and with an integration of landscape, lighting and architecture. Both the Council and Network Rail have striven to remove previously existing visual clutter and resist additional clutter here. It is noted that no advertising clutter has been allowed here, except discreet fascia signs for the 2 retail kiosks within the shafts and several specially designed signage monoliths for the station itself.

3.2 It is considered that the proposed digital screens as advert displays are unacceptable as alien and discordant features within this recently completed landscape. They will create visual clutter and will detract from the simplicity of the 2 ventilation shaft structures which were redesigned with simple grey cladding to subdue their prominence within the new square. In contrast, the new screens, covering almost entirely the shaft facades, will result in emphasising the size and dominance of these utilitarian structures within the square and will upset the visual integrity of the landscape comprising a coherent collection of structures. The screens will detract from the uniformity of the design used for all structures including planters and paving around the square.

3.3 The digital screens are considered excessively large, overly dominant and visually inappropriate within the subdued and integrated character of the square. In contrast to the subdued plain grey facades of the shafts, the screens are designed to display multi-coloured images in a very large and visually obtrusive format. The entire screens will be internally illuminated by day and night, thus overpowering the existing subtle and discreet lighting scheme that is integrated within structures and columns throughout the square. Although the displays will be static, there is the potential for them to change every few seconds (see para 4.1 below), thus drawing even greater attention to them. They will create additional visual clutter within an already visually busy Square surrounded by contrasting intricate architecture of listed buildings.

3.4 The screens will be also highly visible in all views in surrounding streets, such as Pancras Road

and Euston Road, as well as longer views from streets such as Belgrove Street, Crestfield Street and Grays Inn Road. They will be very visually dominant and disruptive in the surrounding area and will harm the historic character of the streets and even nearby Argyle Square where long views to Euston Road are possible. Their size, location, nature and illumination will thus result in visual harm to the character and appearance of the wider King's Cross Conservation Area.

3.5 The location, size and nature of these screens with coloured advertising will also result in visual harm to the setting of the immediately adjoining listed buildings, two Grade I stations (King's Cross and St Pancras) and the Grade II Great Northern Hotel, all of which face the Square and form a historic set piece. The screens will dominate and interrupt views across the square and surrounding streets towards the listed buildings and would detract from their historic relationship with each other and with the open landscape.

3.6 The proposals fail to pay special attention to the desirability of preserving or enhancing the character and appearance of the Conservation Area, and of preserving the listed building, its setting and its features of special architectural or historic interest, under s.66 and s.72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended by the Enterprise and Regulatory Reform Act 2013.

3.7 Overall it is considered that the large screens will create unwelcome visual clutter on a high-profile square that has been specifically designed to a common muted design idiom, thereby causing harm to the appearance and setting of the component structures. It is considered that the proposal will harm the character and appearance of this part of Kings Cross conservation area and the setting of the adjoining 3 listed buildings, all of which were enhanced by the removal of the old canopy and creation of a new purposely-designed Square. This proposal is considered to be harmful to the architectural and historic character of the buildings in this particular location.

3.8 Although the 'Breath' element of the screens is an interesting and innovative solution to reducing air pollution along Euston Road that may provide some benefit to public health, no evidence has been provided to show that any such screens have been permitted and installed on a permanent basis on or adjoining heritage assets (as opposed to temporary displays during a building's restoration). Furthermore it is considered likely that any public benefit that may accrue from the Breath technology could also be achieved through a format which is located and designed to be visually unobtrusive. In this case, the public benefit would not outweigh the harm caused to heritage assets (using the tests in NPPF paragraphs 133 and 134).

3.9 In conclusion, the proposals will not comply with several criteria within Local Plan policy D4 nor will comply with CPG design guidance. It is noted that para 1.38 of CPG on Advertisements admits that 'digital advertisements are by design visually prominent and attention-grabbing with their illuminated images, especially when they are large in size'. It is considered that this is clearly the case with this proposal and that it does not comply with 4 of the 5 locational criteria of this CPG as listed in para 2.3 above.

#### 4. Transport-

4.1 A Road Safety Assessment has been undertaken by the applicants, and TfL's Road Safety team does not have anything to add to the comments already provided in this assessment. They request that if consent is granted, conditions be imposed on the maximum luminance levels, a minimum display time for adverts (ie. 10 seconds), no interval between adverts, and no special effects such as noise or smell. Transport officers raise no objection to the scheme so there is no objection on public safety grounds.

#### 5. Amenity-

5.1 The screens are undeniably large and prominently located, with the oval shaft close to the flats on the upper levels of St Pancras station. The screens will be illuminated but only on a static basis, not flashing as supposed by some residents; in any case the applicant has accepted the need for controls that limit the level of illumination and also the type, ie. no flashing elements. There is no evidence to

suggest that there will be any discernible noise with the changes in digital displays (compared to the old-style physically rotating displays). It is considered that the illumination would not seriously harm the amenity of adjoining residents in terms of light pollution. The oval shaft is located to the north of St Pancras Chambers forming the residential frontage of the station along Euston Road and does not directly face its side frontage; also it is below the level of these flats on the 2<sup>nd</sup> and upper floors. The round shaft is well set away from any flats opposite on Euston Road and in any case the screen is mainly directed northwards to the station. Thus there will be no harmful impact on neighbouring amenity.

#### 6. Recommendation-

Refuse Advertisement consent on grounds of design, size and location harming heritage assets, as follows-

The proposed 2 display screens, by reason of their size, location, design and method of illumination, would be detrimental to the appearance of the 2 host structures and Kings Cross Square, the character and appearance of the Kings Cross conservation area, and the setting of the adjacent 3 listed buildings (Great Northern Hotel, Kings Cross station and St Pancras station), contrary to policies D1 (design), D2 (heritage) and D4 (advertisements) of the London Borough of Camden Local Plan 2017.