

4 December 2018

Camden Council
Planning - Development Control
Camden Council
Camden Town Hall
London
WC1 8ND

Insite Poster Properties Ltd
Barton Hall, 29 Gloucester Street
Cirencester GL7 2DJ
Telephone: 01285 658666
www.insite.co.uk

Dear Sir / Madam,

Town & Country Planning (Control of Advertisements) (England) Regulations 2007

Insite Ref: 8270 - Land at 258 / 274 Grays Inn Road, London, WC1X 8LH

Planning Portal Reference: PP-07449920

Please find enclosed an application for express consent under Regulation 9 of the aforementioned Regulations. This application seeks the following:

Replacement of an existing internally illuminated 48-sheet advertisement display with an internally illuminated 48-sheet digital advertisement display

The application comprises the following documents and drawings:

- Express Consent Application Form
- Site Location Plan T4085 A4 050
- Site Plan T4085 A4 051
- Elevations: Existing and Proposed T4085 A4 060

The fee of £462 will be sent separately quoting the above Planning Portal reference number.

BACKGROUND

The site lies within the curtilage of the Calthorpe Project's inner city community centre and garden. The site provides an essential income stream which the charity wishes to grow by updating the incumbent advertising display to a digital unit.

The existing advertisement measures 6m in width and 3m in height. It comprises a metal frame and cathode tube lighting over the front of which a vinyl image is manually attached. The display is lawful, operating with 'deemed consent' under Class 13 of Schedule 3 of the Regulations, the site having been in advertising use for over 10 years.

The proposal is for its replacement with an advertisement of near identical proportions and orientation, operating in a similar way; displaying illuminated 2-dimensional static images. Despite the proposals more modern display format, the premise of illuminated static advertising would be retained such that there would be no material harm to amenity or public safety.

PROPOSAL

Measuring 6m by 3m, the new advertisement would comprise a pressed metal and reinforced plastic frame to enclose a digital screen.

It would present a range of static images. A new image will materialise every 10 seconds with the interchange between each image virtually instantaneous. Advertisements would not contain any movement, animation or special effects.

The proposal would operate up to 600 candela/sqm during daylight and 150 candela/sqm at night. Advertisements would therefore accord with the Institute of Lighting Professional's best practice guidance; The Brightness of Illuminated Advertisements PLG05 2015. A condition is proposed to ensure its compliance with this standard.

The unit is LED based and would operate remotely. It replaces a less efficient cathode tube lighting system and removes the need for frequent visits, improving the site's long-term sustainability. The environmental benefits of the proposal should therefore be viewed as a positive.

The operational basis of the proposed advertisement can be controlled by reasonable and necessary planning conditions. Accordingly, a schedule of planning conditions is attached to this letter reflecting best practice guidance and decisions issued by local planning authorities across the UK.

ASSESSMENT

The National Planning Policy Framework states that advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts. Section 38(6) of the Planning and Compulsory Purchase Act 2004 does not apply to advertisements and therefore local policies are material insofar as they are relevant; they are not decisive.

Insite records indicate the site has been in advertising use since at least 2006 and so it is a longstanding and established part of the street scene. As such, considerable weight should be attached to the presence of the existing advertisement.

Public Safety

Like the incumbent, the illuminated digital advertisement would be seen by traffic travelling south along Grays Inn Road. The highway is well lit, straight, and level, providing excellent forward visibility. Highway users would be able to glance at advertisements in advance of the site without being distracted from the road ahead. There are no unusual complexities which require drivers to take extra care in manoeuvring along this stretch of highway, and with the proposal in an elevated and offset position, visibility splays would be unaffected.

Under these circumstances such a familiar city-wide feature would not constitute a potentially hazardous distraction to anyone exercising a reasonable standard of care. Consequently, it is considered that the proposal would not unduly distract highway users nor give rise to safety issues.

Amenity

Regarding amenity, it is not thought that the proposal would be detrimental; in either an immediate or wider sense. It is positioned adjacent the Eastman dental institute and nearby a furniture supply store. The Grays Inn Road provides access to and from St Pancras International station and is an important commercial and transport corridor. The proposal would be seen in this context and is where national policy and advice advocates locating advertisements. Here, their impacts are appreciably less and commensurate to their function.

Furthermore, at night the proposal would operate at half the existing display's illumination and be switched off between the hours of 22:00 and 05:00. During daylight it would replicate near ambient conditions by use of internal light sensors to ensure it appears no more prominent than the existing unit.

Given the similarities between the existing and proposed unit there would be little, if any, material change in the appearance of the street scene. As a straight swap the proposal would not amount to clutter or contribute to any cumulative impacts. It would sit comfortably in its visual context without harming amenity, the qualities of the site, or the character and appearance of the wider area.

SUMMARY

The principle of advertising at this location is well established. Given the site has been in advertising use for a long period of time and that it is an accepted part of the street scene, it is not considered that the modernisation of its presentation style to a digital format will undermine the character and setting of the area, or pose any public safety concerns.

The proposal submitted reflects the applicant's preferences. Should the council wish to discuss any aspect of the scheme we would welcome the opportunity to address any concerns (as they arise) prior to determination.

If you require additional information or clarification, please do not hesitate to contact us.

Yours faithfully,

RP

Richard Page
Planner



SCHEDULE OF CONDITIONS ADVANCED BY THE APPLICANT

- A. No advertisement is to be displayed without the permission of the owner of the site on which they are displayed (this includes the highway authority, if the sign is to be placed on highway land);
- B. No advertisement is to be displayed which would obscure, or hinder the interpretation of, official road, rail, waterway or aircraft signs, or otherwise make hazardous the use of these types of transport;
- C. Any advertisement must be maintained in a condition that does not impair the visual amenity of the site;
- D. Any advertisement, hoarding or structure is to be kept in a condition which does not endanger the public; and
- E. If an advertisement(s) is required to be removed, the site must be left in a condition that does not endanger the public or impair visual amenity.
- F. Express consent is permitted for a period of ten years from the date hereof.
- G. The intensity of the illumination of the advertising unit(s) permitted by this consent shall at all times accord with the thresholds set out in the Institute of Lighting Professionals publication "The Brightness of Illuminated Advertisements" (PLG05:2015).
- H. The advertising display shall be switched off between the hours of 22:00 and 05:00.
- I. The minimum display time for each advertisement shall be 10 seconds and there shall be no special effects (including noise, smell, smoke, animation, flashing, scrolling, intermittent or video elements) of any kind before, during or after the display of any advertisement.
- J. The sequencing of messages relating to the same product is prohibited.
- K. The interval between successive displays shall be 0.1 seconds or less and the complete display screen shall change without visual effects (including fading, swiping or other animated transition methods) between each advertisement.
- L. The advertising display panel shall have a default mechanism to freeze an advertisement in the event of any malfunction.