Delegated Report	Analysis sheet	Expiry Date:	05/04/2019
	N/A	Consultation Expiry Date:	10/03/2019

Officer	Application Number(s)
Matthias Gentet	1) 2019/0754/P 2) 2019/0131/A
Application Address	**Drawing Numbers**
Vent Shaft of Euston Square Underground Station Euston Road London NW1 2AF	Refer to Decision Notices

PO 3/4	Area Team Signature	C&UD	Authorised Officer Signature

Proposal(s)

1) Erection of steel framework and cladding around existing concrete vent shaft to display LED digital advertising board; installation of green walls to side elevations (Sui Generis).
2) Display of an internally illuminated LED digital advertising board west elevation of proposed steel structure.

Recommendation(s):	**1) Refuse Planning Permission** **2) Refuse Advertisement Consent**
Application Type:	**Full Planning Permission** **Advertisement Consent**

Conditions or Reasons for Refusal:	**Refer to Draft Decision Notice**					
Informatives:						
Consultations						
Adjoining Occupiers:	No. notified	**00**	No. of responses	**01**	No. of objections	**01**
Summary of consultation responses:	A **Site Notice** was displayed on 14/02/2019 and expired on 10/03/2019, a **Press Advert** was published on 13/02/2019 and expired on 09/04/2019 and **Consultation Letters** were issued on 11/02/2019 and expired on 04/03/3019. <u>Summary of Objections</u> An objection from a local resident was received, summarised as follows: - Concerns regarding the maintenance of the living walls given past examples dying; - If granted, permission and consent should be temporary with condition to maintain the wall in good health. <u>*Officer's Response*</u>*:* *Please see paragraphs 5.1 to 5.4 in the below report.*					
CAAC/Local groups comments:	Not applicable					

Site Description

The application site contains a ventilation shaft located on south slip road access from the large traffic junction on Euston Road leading to Gower Street, the upper south side of the Euston Underpass, and sits outside University College Hospital. The junction connects the south-westbound and north-eastbound section of Euston Road (including the Euston Underpass) with Hampstead Road to the north and Tottenham Court Road to the south. The shaft provides ventilation to the tunnels serving the adjacent Euston Square Underground Station located on the corner of Gower Street with Euston Road to the north-east.

The area is dominated by modern architectural tall buildings surrounding the site, which provide commercial and office uses including retail at ground floor level.

The site is not in a conservation area and is not listed, nor are there any listed buildings within the immediate vicinity.

Relevant History

Site History:

2004/2410/A – (granted on 23/06/2004) - Display of internally illuminated poster panel measuring 3m x 4m on northern elevation of ventilation shaft to replace existing panels.

Site Enforcement History:

EN19/0259 - Unauthorised display of an internally illuminated display board on the north facing elevation of a ventilation shaft connected to Euston Square Underground station - not in accordance with application reference: 2014/2410/A - Ongoing

Adjacent Sites History:

Euston Road
Kings Cross Square
2018/2165/A – (**refused on 10/07/2018 and dismissed on appeal** reference: APP/X5210/A/18/3208882 **on 13/12/2018**) - 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

> *Reasons for Refusal:*
> *The proposed 2 display screens, by reason of their size, locations, design and method of illumination, would be detrimental to the appearance of the host structures and Kings Cross Square, the character and appearance of the Kings Cross Conservation Area and the setting of the adjacent 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.*
>
> *Reasons for Dismissal:*
> *The proposed LED digital advertisements would wrap around the upper part of the large oval structure and cover the upper northern semi-circular part of the smaller round structure. Given they would obscure the characteristic fins, they would be detrimental to the design and*

appearance of the host structures. The proposed advertisements would have an unacceptably harmful effect on the visual amenity of the area. They would fail to preserve or enhance the character or appearance of the CA. They would also be detrimental to the setting of the nearby listed buildings.

University College Hospital, No235
2013/6400/A – (**refused on 22/10/2013 and dismissed on appeal** reference: APP/X5210/H/13/2208080 **on 31/12/2013**) - Display of digital screen to front elevation of hospital.

Reasons for Refusal:
The proposed advertising screen, by virtue of its size, position, prominent location and method of illumination, would harm the character and appearance of the host building and wider street scene contrary to policy CS14 (Promoting High Quality Places and Conserving Our Heritage) of London Borough of Camden Local Development Framework Core Strategy and Policy DP24 (Securing high quality design) and of London Borough of Camden Local Development Framework Development Policies.

Reasons for Dismissal:
In this context, the addition of a large, illuminated advertising screen would appear out of character. The building on which the proposed advertisement would be located is one such example, and despite the appellant's assertion that the sign would respect the architectural integrity of the building, it would result in additional attention being drawn away from the street scene towards the building. This would lead to the screen appearing unduly dominant within the context of its surroundings. Whilst I consider that the proposal does not have a severe impact on the appearance of the building itself, these considerations do not outweigh my strong concerns regarding the harmful visual impact of the proposal on the surrounding area.

2012/4564/A – (**refused on 18/10/2012 and dismissed on appeal** reference: APP/X5210/H/12/2189379 **on 11/07/2013**) - Display of digital screen and lettering to front elevation of hospital.

Reasons for Refusal:
The proposed LED advertising screen, by virtue of its size, prominent street corner location, and awkward relationship to the design of the elevation of the host building, would appear unduly dominant, and therefore harmful to the character and appearance of the host building and street scene. The proposal is therefore contrary to Policy CS5 (Managing the impact of growth and development) of London Borough of Camden Local Development Framework Core Strategy and Policy DP24 (Securing high quality design) of London Borough of Camden Local Development Framework Development Policies.

Reasons for Dismissal:
The media screen would be fixed to the curved corner of the building overlooking the major road junction formed by Euston Road and Tottenham Court Road. At 6m high and 12m in width, and located on this highly prominent corner of the building, the screen would, notwithstanding the size of the building, have a substantial impact on its appearance and the way it relates to its surroundings. For such a central, urban area, the upper levels of buildings are remarkably free of advertising. This helps to give the area a clean, high quality appearance. This aspect of the character of the area would be significantly compromised by the appeal proposal. The bottom of the screen would be about 9.4 m above the ground, well above the great majority of advertising material nearby, including the large screens at the entrances to the underpass. As such, and given the current lack of advertising clutter at upper levels in this locality, it would appear incongruous and excessively prominent and would

dominate this important corner of the building. As a result it would have a marked, harmful effect on the character and appearance of the area and be an intrusive and harmful feature.

Euston Underpass
2014/4500/P – (granted on 18/09/2014) - Variation of condition 2 of planning permission issued on 01/07/2011 (Camden ref: 2010/6615/P) for 'Alterations to existing guardrails in connection with the erection of two projecting advertisement units to either side of the Euston underpass'; namely to amend the time limit on retention of the advertising panels.

2014/4499/A – (granted on 18/09/2014) - Display of two internally illuminated signs (LED screens) to sides of the Euston underpass.

2010/6615/P – (granted on 01/07/2011) - Alterations to existing guardrails in connection with the erection of two projecting advertisement units to either side of the Euston underpass.

2010/6613/A – (granted on 01/07/2011) - Display of two illuminated advertisement signs (LED screens) to sides of the Euston underpass.

'Green Walls' Relevant Sites History within the Borough;

83-95 Southampton Row
2016/4542/P – (granted on 13/10/2016) - Installation of new shopfront to hotel and restaurant fronting Southampton Row including 2 x green walls; replacement hotel signage and installation of new bronze-clad entrance pediment with glass canopy over hotel entrance; replace existing rendered fascia with mosaic tiling; replacement planters and re-paving of hotel forecourt.

Generator Hostel
MacNaughton House
Compton Place
2015/2091/P – (granted on 06/08/2015) - Erection of a new front entrance to hostel with covered loggia entrance, acoustic glazed atrium with green wall to enclose a new platform lift for luggage & disabled guests and reconfiguration of existing front fire escape stairs; Erection of new door and staircase to provide additional access to rear external courtyard.

MTV Studios
17-29 Hawley Crescent
2008/4458/P – (granted subject to S106 on 21/01/2010) – Internal alterations to provide additional floor space (Class B1), and external alterations including new plant at roof level and provision of new facade to eastern side of Hawley Crescent elevation.

Relevant policies

National Planning Policy Framework 2019

The Draft London Plan 2017

Camden Local Plan 2017
A1 – Managing the Impact of Development

A3 - Biodiversity
CC2 – Adapting to climate change
D1 – Design
D4 - Advertisements
T1 – Prioritising walking, cycling and public transport

Camden Planning Guidance 2018 (as amended)
CPG – Advertisement (2018)
CPG – Amenity (2018)
CPG1 – Design – Chapter 2

Euston Area Plan (January 2015)

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

Assessment

1. Proposal and Background

1.1 Planning permission is sought for the erection of an outer steel cladding on a steel frame affixed onto the existing concrete of a ventilation shaft, with the installation of green walls on both sides of the structure.

1.2 Advertisement Consent is sought for the display of an internally illuminated LED digital advertising board on the ventilation shaft's west elevation, facing onto Euston Circus junction.

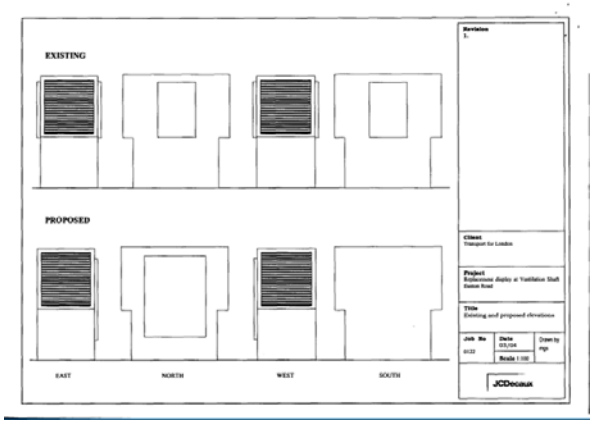
1.3 In order to facilitate the installation of the digital screen, a metal frame structure would be installed and then clad with a metal envelope which would include green (living) walls on the north and south sides, a metal mesh curved roof meeting with the ventilation grill to the rear (north-east elevation) and the digital LED screen on the south-western elevation, facing onto the Euston Circus junction.

1.4 Due to the scale of the proposed metal envelope and addition of 2no. green (living) walls, planning permission is required in order to address the design and amenity impacts of the structure on the surrounding area.

1.5 It must be noted that details of the north facing illuminated signage on the existing drawings do not match the sign that is currently in place. Photographic evidence shows that the existing sign extends below the bottom level of the timber fence sitting atop the concrete shaft by approximately 0.6m (estimate). The sign is also wider than the one shown on the existing drawing where it is depicted as occupying approximately just over half of the elevation. The photographic evidence show the sign to be at least 0.3-0.4m wider (estimate). This would therefore increase the size of the advertising face by about 6sqm (estimate).

1.6 Another aspect of the current appearance of the shaft is the addition of timber fencing sitting atop the ventilation shaft. It would seem that this fixture sitting on the vent as a crown would have been installed in order to display a much larger sign on the north facing elevation than the one originally approved in 2004 under application reference: 2004/2410/A. The approved signage measured approximately 3m x 4m (12sqm area). It was also to be positioned centrally to the concrete elevation. It is unclear when the current advertising sign and timber fencing were installed but photographic evidence supports this to have occurred prior to July 2014. See below the approved 2004 details and the site at present:

Approved under 2004/2410/A



As now

1.7 The discrepancy in the existing details will not, however, impact greatly on the assessment of the proposal due to the nature and scale of the proposed development. Also, the existing sign would be removed and a new sign, in a new location, installed. Nevertheless, the difference in the size of advertising face has been considered as part of this assessment.

1.8 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.

2. Assessment

2.1 The principle considerations in the determination of both applications are:

- Design
- Siting
- Amenity
- Public Safety

3. Design and Heritage

3.1 Policy D1 (Design) of the Camden Local Plan 2017 states that '*The Council will seek to secure high quality design in development. The Council will require that development that respects local context and character; is of sustainable and durable construction and adaptable to different activities; comprises details and materials that are of high quality and complement the local character; integrates well with the surrounding streets and open spaces, and contributes positively to the street frontage; incorporates high quality landscape design and maximises opportunities for greening for example through planting of trees and other soft landscaping; preserves strategic and local views.'*

3.2 CPG1 (Design) also states that '*High quality design makes a significant contribution to the success of a development and the community in which it is located. The Council requires development schemes to improve the quality of buildings, landscaping and public spaces and we will not approve design which is inappropriate to its context or fails to improve the character of an area*.'

3.3 The guidance further states that '*Materials should form an integral part of the design process and should relate to the character and appearance of the area, particularly in conservation areas or within the setting of listed buildings. The durability of materials and understanding of how they will weather should be taken into consideration. The quality of a well-designed building can be easily reduced by the use of poor quality or an unsympathetic palette of materials*.'

Steel Envelope and Steel Frame

3.4 The existing shaft consist of a 'T' shape concrete structure with a narrow footing which measures approximately 1.8m in height - between ground level and the base of the wider shaft, by 2.9mm in width and 4.2m in depth (front to rear). The upper shaft area projects out to the south-west and north-east by approximately 1m over the pavement, and measures approximately 2.9m in width by 6.2m in depth (front to rear). Timber cladding/fencing is mounted atop (crown) the shaft, and measures approximately 4.9m in height by 3.5m in width and 6.2m in depth (front to rear). The overall height of the structure is approximately 7.8m. An existing advertisement display board is in place on the north side of the ventilation shaft, facing directly onto Euston Road and overlooking onto the Euston Underpass. The timber fencing is there to accommodate the signage so that is appears to be applied onto the north elevation of the shaft [*See paragraph 5.11 below for its full assessment*].

3.5 The proposed installation would consist of a steel frame that would be installed over the concrete shaft. This would require the removal of the existing timber cladding/fencing currently in place. The metal frame would allow for a steel envelope to be mounted on which would cover the concrete shaft obscuring it completely from view, but without altering its structure. The steel frame would measure approximately 3.9m in width by 8.6m in depth (at its base), 5.3m in width. It would measure 10.2m in height at the highest point (south-west facing), and 5.6m in height at the lower point (north-east facing), and would support the steel envelope and the green walls to the flank elevations and the LED digital screen (to the south-west).

3.6 The steel frame would be anchored below ground, on 3no. strip foundations located 0.4m under the pavement area and would measure approximately 6.8m in width by 7.85m in depth and 1.2m in height (2no.), and 6.8m in width by 3m in depth by 2m in height (1no.) respectively. Currently, the concrete shaft sits approximately 3m away from the underpass wall to the north of the site. No details on the execution of the installation has been provided. It would be expected from the applicant that details for such works would be provided in the form of Construction Management Plan or similar secured by S106 (given the urban/constrained nature of the site) should the application be recommended for approval. It is therefore not possible to comment on how the works would impact on the surrounding area, in particular the traffic in and out and around Euston Circus and the Euston Road slipway toward Gower Street. Traffic disruption would be anticipated and it is envisaged that excavations of some sort would be required in order to implement the erection of the steel frame.

3.7 The design of the steel envelope would consist of a south-west facing LED screen display installed approximately 2.5m from ground level and measuring approximately 8m in height by 5m in width by 1.2m in depth. It would, however, be set back into the envelope and would protrude from the elevation only slightly. The base of the envelope is proposed to measure approximately 5.5m in width by 9.2m in depth (front to rear). The rear part of the envelope (north-east facing) would consist of the louvre grill matching the location of the existing ventilation grill on the concrete shaft to allow the continued unimpeded working of the vent shaft, and would measure approximately 6.75m in height by 3.7m in width. The lower height of the rear section of the envelope permits for the curved/arc design of the roof area which also contains curved ventilation sections crossing the top in regular intervals that would assist the

ventilation function of the shaft by enabling air to escape through the top. The roof would have curved sides and would measure approximately 9.4m in depth (front to rear) by 5.4m in width, and 10.5m front ground level (at south-west facing end) and 3.1m in width and 6.4m from ground level (at north-east facing end).

3.8 The existing concrete shaft's footprint would cover approximately 12.5sqm at its base. Its overall spread, due to the overhanging design of the upper part of the shaft, would cover an area of approximately 20.5sqm. In comparison, the envelope's footprint would cover approximately 50.6sqm at its base. Due to the particular design of the fixture (convex sides), the overall area measured from the widest angles would cover approximately 52sqm. The footprint of the new installation would thus quadruple. Due to the larger scale of the installation, the distance between the proposed structure and the underpass wall would be reduced and would then leave a gap of approximately 1.2-1.3m between the structure and the underpass wall. Clearly a significant reduction. [*This is further discussed in paragraphs 4.3 to 4.5 below*.]

3.9 It must be noted that to the south side of the structure, there is a row of London Planes within an area of gravel covered ground. The larger footprint of the new fixture would also reduce the distance/gap available at present between the trees and the concrete shaft. Unfortunately, the relevant measurements cannot be verified as the exact position of the closest tree (in terms of the trunk) is not shown on the relevant floor plan. The impact of the proposed installation would therefore serve to obstruct free pedestrian movement within this section of pavement area.

3.10 The steel envelope is of an interesting, modern design which carries some merit. Its features (louvre grills) respond well to the needs and function of the ventilation shaft it would be covering, and as such, would not interfere with the running of the shaft. However, the size and scale of the structure are excessive. In terms of overall volume, the concrete shaft would measure approximately 150 cubic metres. The proposed envelope would measure in excess of 510 cubic metres. Although these measurements are an estimate, they, nonetheless demonstrate the size of the new structure that would tower over the pavement and within the streetscape when compared to the ventilation shaft. Despite the poor design qualities and rather utilitarian appearance of the shaft at present, its scale can be considered to be reasonable. Its presence, in such a location is also justified as it provides ventilation of the underground tunnels used for the day to day running of the tube lines serving Euston Square Underground Station below. Whilst it is not of a typically desirable design, the surrounding tall buildings, heavy trafficked junction and thoroughfares somewhat absorb its presence within the urban landscape. The adjacent trees do also provide some level of natural shielding as well as providing a softening background.

3.11 The proposed steel envelope in contrast would stand out due to its size and bulk, giving the appearance of a standalone futuristic tower in the middle of the pavement. Its modern lines, combined with the material (steel) would create an incongruous and overly dominant structure that would be out of place and no longer reflecting the needs and purpose of the concrete shaft it would serve to obscure. Furthermore, its prominent location would introduce a metallic focal point within the long views from the north-eastern and south-western ends of Euston Road, detracting from the clean and orderly lines of buildings bordering both sides of Euston Road.

3.12 By virtue of its size, scale, design, location and materials, the steel frame and envelope structure would be detrimental to the surrounding buildings and surrounding locale, contrary to policy D1 of the Camden Local Plan, and CPG (Design).

4. Siting

4.1 Policy T1 (Prioritising walking, cycling and public transport) states that '*In order to promote walking in the borough and improve the pedestrian environment, we will seek to ensure that developments improve the pedestrian environment, are easy and safe to walk through ('permeable'), provide high quality footpaths and pavements that are wide enough for the number of people expected to use them. Features should also be included to assist vulnerable road users where appropriate.*'

4.2 The policy further states that '*In order to promote cycling in the borough and ensure a safe and accessible environment for cyclists, the Council will seek to ensure that development is easy and safe to cycle through ('permeable').*'

4.3 The proposal would be located on a pavement measuring approximately 14m at its widest part, arching in the western direction towards the crossing over the Euston underpass. Access on the pavement is divided into 2no. paved lanes on either side of the shaft which serve both cyclists and pedestrians. Adjacent to the south-easterly paved lane, a gravel covered area measuring approximately 5.2m in width provides planting area for some large London Planes. The existing setting provides an area of approximately 1.5m between the concrete shaft and the paved lane. Due to the larger size of the new structure, the 1.5m gap would disappear and the edge of the steel envelope would override slightly onto the paved lane. Nevertheless, a 1.9m paved passage would still be available for the use of pedestrians and cyclists.

4.4 In terms of accessibility, it is clear that the new installation would infringe greatly onto the area surrounding the site. Although there is still sufficient space left on the southern part of the development, the northern pavement section between the new structure and the underpass wall is severely restricted to 1.2m in width, substantially blocking access to the north of the site and forcing pedestrians and cyclists to converge through to the south of the structure in order to go past. The proposal would clearly impede the free flow of foot and cycling traffic by creating a bottle neck. This is likely to further impede visually impaired pedestrians who would have difficultly navigating around the installation.

4.5 The proposal fails to provide a free, permeable access to the pavement area and past the new structure. It would serve to obstruct the free flow of pedestrians and cyclists alike, and would likely particularly impact on the visually impaired, and as such, is considered to be unacceptable and contrary to policy T1.

5. **Amenity**

Green 'living' Walls

5.1 Policy A3 (Biodiversity) states that '*In many developments, it should be feasible to incorporate biodiversity enhancing measures. These can deliver a wide range of environmental and social benefits. Potential responses including roofs and walls. The Council will negotiate the provision of biodiverse living roofs in all suitable developments.*'

5.2 Policy CC2 (Adapting to climate change) states that '*Development should adopt appropriate climate change adaptation measures such as incorporating bio-diverse roofs, combination green and blue roofs and green walls where appropriate. To support a sustainable approach to drainage, all development should install green roofs, permeable landscaping, green walls and combination green and blue roofs, where appropriate. Green roofs provide valuable habitats which promote biodiversity, cool the local microclimate and can provide visual amenity.* '

5.3 The flanks of the envelope are to be clad with vegetation, most commonly referred to as green 'living' walls. Each would measure approximately 7m in width (taken at the bottom) by 7.1m in

height (highest point) and 3.9m in height (lowest point) with an arched top of 7.8m in width, and would cover an area of approximately 40.1sqm. The distance between the base of the green wall and ground level would be approximately 2.6m. The green 'living' walls would introduce greenery into a largely trafficked area surrounded by tall, modern buildings which offer little in terms of natural habitat and vegetation, with the exception of the row of London Planes stretching along the pavement of the Euston Street slipway into Gower Street. New vegetation would be a welcome addition that would benefit the area - not just in terms of appearance (softening within urban surroundings) – but also in terms of wildlife, and to help counter-act high levels of traffic pollution generated by the busy nature of Euston Road.

5.4 The green 'living' walls would increase the level of greenery/vegetation which is currently under-represented in and around Euston Circus. It would be a welcome development that could improve the visual amenities of the urban setting, and as such, is considered to be acceptable in principle in accordance with policies D1, A3 and CC2 of the Camden Local Plan.

LED digital display screen

5.5 Policy D4 (Advertisements) of the Camden Local Plan 2017 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. The Council will resist advertisements that contribute to an unsightly proliferation of signage in the area, contribute to street clutter in the public real, cause light pollution to nearby residential properties or wildlife habitats or impact upon public safety.*'

5.6 CPG (Advertisements) also states '*Advertisement hoardings or posters will not usually be acceptable in predominantly residential areas. Digital advertisements are by design visual prominent and attention grabbing with their illuminated images, especially when they are large in size. They are not suitable for locating in some areas. Factors which make a location less suitable for digital billboards include location where the advertisement could become the most prominent feature of the street scene. Advertisement hoardings or posters will not usually be acceptable in predominantly residential areas.*'

5.7 The guidance further states that '*The Council will resist illumination of hoardings where it is a nuisance or out of character with the area*.'

5.8 Referring to best practice guidance, CPG (Advertisements) also 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.'

5.9 CPG6 (Amenity) refers to the impact of artificial light as '*Excessive or poorly designed lighting can cause light spillage and glare and be damaging to the environment by:*
- having a detrimental impact on the quality of life of neighbouring residents;
- changing the character of the locality;
- altering wildlife and ecological patterns; and
- wasting energy.'

5.10 It further states that '*The Council will therefore expect that the design and layout of artificial light be considered at the design stage of a scheme to prevent potential harmful*

effects of the development on occupiers and neighbours in terms of visual privacy, outlook and disturbance. Artificial lighting should only illuminate the intended area and not affect or affect the amenity of neighbours.'

5.11 An existing internally illuminated advertisement display board is in place on the north side of the ventilation shaft, facing directly onto Euston Road and overlooking onto the Euston Underpass, and measures approximately 3.8m* in width by 5.1m* in height and 0.2m in depth (thickness) (with frame), 3.4m* in width by 5.5m* in height and 0.2m in depth (thickness) (without frame), and with an advertising face covering approximately 20sqm*. It is displayed in the top right hand corner of the north facing elevation, at about 2.2m* from ground level. The timber fencing is there to accommodate the signage so that is appears to be applied onto the north elevation of the shaft in its entirety instead of projecting upwards above the top of the shaft by approximately 3.1m in the air and unsupported.
** These are estimated measurements. See paragraphs 1.5 to 1.7 for the reasons.*

5.12 The purpose for the installation of the steel envelope onto a steel frame is that it would enable the display of a new internally illuminated LED digital display screen installed approximately 2.5m from ground level, and measuring approximately 8m in height by 5m in width by 1.2m in depth (with the black frame) and approximately 7.3m in height by 4.8m in width (without the frame). The advertising face area would cover approximately 35.5sqm. The signage would be south-west facing, looking directly onto Euston Circus. The existing sign would be removed altogether.

5.13 The chosen site is surrounded by tall buildings providing office and commercial usage as well as University College Hospital on the opposite side of the Euston Road slipway – approximately 30m from the site to the south. Due to the orientation of the structure and the facing direction of the sign, any light spillage would be negligible and the illuminance would not impact onto the rooms within the hospital.

5.14 Nevertheless, the size of the digital screen is significant at 35.5sqm. Due to the open design of Euston Circus and the width of Euston Road, the sign would be visible from afar. Although this is clearly the purpose of such advertisement which is to be as noticeable as possible and from as wide an angle, its presence in such a location makes it an incongruous addition. It would intrude on a largely signage and clutter free area by its very nature, but also by its sheer size and prominent position. Combined with the size of the elevation of the envelope onto which is it is to be displayed, the overall elevation is overbearing and would tower over the footpath and, by standing out, would be out of context at high level.

5.15 The proposal would introduce a detrimental method of illumination. Digital advertisements appear significantly more visually obtrusive than the back-lit display and would create visual clutter. Despite the advertisement providing a range of static images only - changing every 10 seconds (not flashing) – and with a proposed illuminance level of 300cd/m, the very nature of LED digital method of illumination with a rotating display would transform the advertising face of the sign into an entire source of light and glare.

5.16 It must be noted that digital advertising displays can be found on the overhead of the bridge over the Euston underpass. Both are large and bulky features which are in direct views from the south-westbound and north-eastbound traffic. However, both signs are at low level. Although they do protrude above ground level by an estimated 2m, they do benefit from some partial shielding by means of the underpass walls, security railings and fencing mesh atop. Their low level position makes both advertising displays less conspicuous and mostly visible to the approaching traffic enter the underpass. They are therefore not towering fixtures, at high level and noticeable from afar, intruding onto the locale, as is proposed here.

5.17 By virtue of its size, scale, design, location and method of illumination, the proposed LED digital advertising screen would be an incongruous and bulky feature. It would introduce an illuminated fixture at high level that would have a detrimental impact on Euston Circus. The commercial advertising screen would fail to preserve or enhance the appearance and character of the surrounding locale, contrary to policies D4 (Advertisements), CPG (Advertisements) and CPG6 (Amenity).

6. Public Safety

6.1 Policy D4 (Advertisements) states that '*Advertisements will not be considered acceptable where they impact upon public safety, including when they:*
- *obstruct or impair sight lines to road users at junctions and corners;*
- *reduce the effectiveness of a traffic sign or signal;*
- *result in glare and dazzle or distract road users;*
- *distract road users because of their unusual nature;*
- *disrupt the free flow of pedestrian movement; or*
- *endanger pedestrians forcing them to step on to the road.*'

6.2 The proposed digital display would continue to display static, poster-like images only. Each poster would be displayed for at least 10 seconds, in a similar way to traditional scrolling vinyl poster displays. There would be no video or animation used.

6.3 The application has been prepared in accordance with a document commissioned by transport for London titled 'Guidance for Digital Roadside Advertising and Proposed Best Practice'. Given the non-scrolling/animated nature of the sign and illumination, the illumination level and method could be considered on balance to be acceptable in principle.

6.4 Nevertheless, it is worth noting the collision study carried out at the junction, as provided by the applicant. Given the details, the proposal wouldn't present any significant public safety concerns. On this point, the proposal is considered to be acceptable.

7. Conclusion

7.1 The steel frame and steel envelope, by virtue of their size, scale, design, location and materials would form bulky, incongruous and overly dominant features that would not relate to the surrounding area, and would detract from the clutter free aspect at high level on the highway. These elements of the proposal are considered to be an unsympathetic and unacceptable form of development that would be detrimental to the character and appearance of the streetscape and surrounding locale, contrary to policy D1 (Design) of the Camden Local Plan 2017.

7.2 The steel frame and envelope, by virtue of their size, scale, design and location, are an unacceptable form of development that would be detrimental to the free movement of pedestrians and cyclist and would create an obstacle to the visually impaired, contrary to policy T1 (Prioritising walking, cycling and public transport) of the Camden Local Plan 2017.

7.3 The proposed LED digital advertising screen, by virtue of its size, scale, design, location and method of illumination, would be an incongruous and bulky feature that would introduce an illuminated fixture as well as create visual clutter at high level. This element of the proposal is considered to be an unsympathetic and unacceptable form of development that would be detrimental to the character and appearance of the streetscape and surrounding locale,

contrary to policy D4 (Advertisements) of the Camden Local Plan 2017.

8. Recommendation

8.1 Refuse Planning Permission

8.2 Refuse Advertisement Consent