

Delegated Report

Expiry Date:

04/11/2019

Officer

Tony Young

Application Number

2019/4561/A

Application Address

150 Holborn
London
EC1N 2NS

Application Type:

Advertisement Consent

1st Signature

2nd Signature (If refusal)

Conservation

Recommendation:

n/a

Refuse Advertisement Consent

Proposal(s)

Display of non-illuminated 3-sided shroud advertisement, wrapped around existing site office cabins supported on steel gantry for a temporary period until 01/10/2020.

Consultations

Consultation method:

No statutory consultation required

Summary of consultation responses:

No consultation responses received

Site Description

The application site is located on the north side of Holborn with Brooke Street to the east and Gray's Inn Road to the west and faces the adjacent boundary with the City of London to the south. The site comprises of existing site office cabins supported 5m above the public highway on a steel gantry and grouped together in a structure that measures 17m high from ground level by 20m wide by 5m deep. The cabins are located in front of a site currently under construction following the demolition of existing buildings.

The site is not located within a conservation area, but is positioned between the immediately adjacent Hatton Garden Conservation Area to the east, Bloomsbury Conservation Area to the west and Chancery Lane Conservation Area to the south (part of the City of London).

There are several listed buildings surrounding the site. In particular:

- (1) To the east of the site and immediately adjacent lies no. 142 Holborn Bars (also known as the Prudential Assurance Building) which is a part 4 / part 6 storey Grade I listed building;
- (2) To the south of the site lies nos. 1-4 Holborn Bars and nos. 337 and 338 High Holborn that are listed as Grade I and Grade II* respectively. Staple Inn Quadrangle lies to the rear of these buildings comprising nos. 4-6 Staple Inn (Grade I) and 7-8, 9-10 and Staple Inn Hall (all Grade II). These buildings lie within the Chancery Lane Conservation Area that is part of the City of London;
- (3) On the junction of Gray's Inn Road and Holborn is the Grade II listed City boundary Obelisk.

The site is located within a strategic view from Primrose Hill to St Pauls, and the background of the strategic view from Greenwich to St Pauls and Blackheath Point to St Pauls.

Relevant History

Application history:

2013/7299/A (150 Holborn) - Addition of external lighting to shroud of 1:1 image of building facade

approved under permission 2013/4086/A dated 24/09/2013. Advertisement consent refused and dismissed on appeal dated 04/02/2014 (APP/X5210/H/2213289)

2013/4086/A (150 Holborn) - 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. Granted advertisement consent dated 24/09/2013

Enforcement history:

EN15/0835 - Aluminium frame fixed to the building providing a frame upon which a large banner is attached to it without planning permission. Breach ceased and case closed 20/08/2015

EN15/0173 - Large advertisement on south elevation fronting Holborn and shroud. No breach found – advertisement is in accordance with consent granted 24/09/2013 (2013/4086/A)

EN14/0302 - Size of advertisement on hoarding larger than approved. Breach ceased and case closed 01/07/2014

Relevant policies

National Planning Policy Framework 2019

The London Plan 2016

London Borough of Camden Local Plan 2017

A1 - Managing the impact of development

D1 - Design

D2 - Heritage

D4 - Advertisements

T1 - Prioritising walking, cycling and public transport

Camden Planning Guidance (CPG)

CPG Advertisements (March 2018) – paragraphs 1.1 to 1.9; and 1.24 to 1.27 (Shroud advertisements)

CPG Design (March 2019) - chapters 2 (Design excellence) and 3 (Heritage)

CPG Amenity (March 2018) - chapters 2 (Overlooking, privacy and outlook) and 4 (Artificial light)

CPG Transport (March 2019) – chapters 7 (Vehicular access and crossovers) and 9 (Pedestrian and cycle movement)

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

Planning (Listed Buildings and Conservation Areas) Act 1990 as amended by the Enterprise and Regulatory Reform Act (ERR) 2013

Planning Enforcement Initiative to remove unsightly advertisement hoardings in the Borough

Assessment

1. Proposal

- 1.1 The application seeks advertisement consent for the display of a non-illuminated 3-sided shroud, wrapped around existing site office cabins for a temporary period until 01/10/2020. The cabins are supported 5m above and over the public highway on a steel gantry and grouped together in a structure that measures 17m high from street level by 20m wide by 5m deep. The cabins are located in front of a site currently under construction following planning permission (2016/2094/P) granted approval dated 25/06/2018 (for the demolition of existing buildings and redevelopment for mixed use development up to 9 storeys in height).



Photographs 1 & 2 – views of existing office cabins and gantry facing eastwards (with the adjacent Grade I listed Holborn Bars shown behind and Grade II listed Obelisk in foreground)

- 1.2 The shroud would measure 12m high by 20m wide on the Holborn elevation and 12m high by 5m wide on both the Brooke Street and Gray's Inn Road elevations. The shroud would be made from a PVC material and supported on a tubular frame, offset from the face of the cabins and supporting steel structure by between 250mm and 400mm.



Images of proposed shroud advertisements – Gray's Inn Road, Holborn and Brooke Street elevations

2. Assessment

- 2.1 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.
- 2.2 The principal considerations therefore material to the determination of this application are:

- a) visual amenity – the design and impact of the proposal on the character and appearance of the wider streetscene, adjacent conservation areas, and the settings of the nearby listed

buildings; and on neighbouring amenity (in so far as the Town and Country Planning (Control of Advertisements) Regulations 2007 allow consideration in this regard); and

- b) transport and public safety – the impact of the proposal on highway, pedestrian and cyclist's safety.

3. Visual amenity

- 3.1 Local Plan Policy D1 (Design) establishes that careful consideration of the characteristics of a site, features of local distinctiveness and the wider context is needed in order to achieve high quality development in Camden which integrates into its surroundings.
- 3.2 Policy D4 (Advertisements) confirms that the Council will support advertisements that preserve the character and amenity of an area, and preserve or enhance conservation areas and heritage assets, but will resist advertisements that contribute to an unsightly proliferation of signage in the area and to street clutter in the public realm. *“Advertisements and signs should be designed to be complementary to and preserve the character of the host building and local area. The size, location, materials, details and illumination of signs must be carefully considered. Interesting and unique styles of advertisements and signs will be considered acceptable where they are compatible with the host buildings and surrounding environment. The Council will resist advertisements where they contribute to or constitute clutter or an unsightly proliferation of signage in the area.”* (paragraph 7.82 – policy D4: Camden Local Plan, June 2017).
- 3.3 More specifically with regard to shroud advertisements, paragraphs 1.24 and 1.25 of the Camden Planning Guidance CPG (Advertisements) advises that *“as a result of the scale and size of shroud advertisements, their appearance can create a conflict with the surrounding environment and the street scene,”* and further that *“conservation areas and listed buildings are particularly sensitive to shroud advertisements as they can appear overwhelming, and disrupt the appearance of a high quality built environment.”*
- 3.4 The site is not located within a conservation area, but is positioned between the immediately adjacent Hatton Garden Conservation Area to the east, Bloomsbury Conservation Area to the west, and Chancery Lane Conservation Area to the south (part of the City of London). It is also noted that the application site is located directly adjacent to and opposite several important listed buildings. In particular:
- (1) No. 142 Holborn Bars (also known as the Prudential Assurance Building) lies to the east of the site and is a part 4 / part 6 storey Grade I listed building. It was designed by Alfred Waterhouse and built from 1885-1901 with alterations in 1930-32 and 1989-93. It has significant architectural merit and aesthetic value. It is currently occupied by De Vere Venues and until recently was the London office of Historic England;
 - (2) Nos. 1-4 Holborn Bars and nos. 337 and 338 High Holborn lie to the south of the site and are Grade I and Grade II* listed respectively. They are a terrace of 5 storey Elizabethan buildings dating from 1586 that survived the Great Fire and provide a unique example of secular Medieval London. Staple Inn Quadrangle lies to the rear of these buildings comprising nos. 4-6 Staple Inn (Grade I) and 7-8, 9-10 and Staple Inn Hall (all Grade II). These buildings lie within the Chancery Lane Conservation Area that is part of the City of London;
 - (3) Grade II listed pair of Obelisks located on the junction of Gray's Inn Road and Holborn City of London boundary. Formerly surmounted by lanterns, now replaced by gilded griffins, these form a pair of identical obelisks on the north and south sides of the road.
- 3.5 Listed buildings are designated heritage assets and policy D2 (Heritage) aims to preserve or enhance the borough's listed buildings, stating that, *“the Council will resist development that would cause harm to the significance of a listed building through an effect on its setting.”*

- 3.6 While it is accepted that all advertisements are intended to attract attention, the introduction of these large shroud advertisements (12m high by 20m wide on the main Holborn elevation and 12m high by 5m wide on the side elevations) in this location is considered to be wholly inappropriate as it would result in an unduly dominant, excessively large and visually disruptive addition to the streetscene, as well as, introducing visual clutter within the public realm that is detrimental to the character and appearance of the surrounding Conservation Areas. Furthermore, the proposed shroud advertisement is also considered to be harmful within this location by virtue of its' close proximity to the settings of several important listed buildings. The proposed advertisement is not considered to respect the architectural form and scale of these listed buildings, and as such, would have an adverse and harmful impact on their special architectural and historic qualities.
- 3.7 Moreover, paragraph 1.26 of the CPG (Advertisements) advises that shrouds will only be permitted where the:
- *scaffolding covers the entire elevation of the building and the netting on the scaffolding depicts a true 1:1 image of the completed building which is undergoing construction work;*
 - *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 20% of the shroud on each elevation and is not fragmented. The advertisement must also respect the architectural form and scale of the host building. Where shroud and banner advertisements are considered acceptable on listed buildings or in conservation areas, the advertisement on the shroud should not cover more than 10% of the shroud on each elevation and is not fragmented. The location of the advertisement on the shroud will depend on the character of the local built form and the nature of views within it.*
- 3.8 In this instance, the image shown on the proposed shroud would not be a true 1:1 depiction of the completed building and would wrap around the steel gantry contrary to the above guidance. The proposed advertisement would also cover the entire shroud rather than a smaller proportion as advised. Furthermore, the proposed shroud advertisement would screen temporary site office cabins mounted on a steel gantry rather than a building elevation (the original buildings have been demolished), again contrary to guidance. As such, the public benefit from the proposals would be limited given that the shroud would shield only a small part of the actual construction site with the majority of the site and works remaining visible from public views, especially from Gray's Inn Road, Brooke Street, and approaches along Holborn itself.
- 3.9 It is noted that advertisement consent was granted in 2013 (2013/4086/A) for the display of a non-illuminated advertisement shroud (measuring 10m x 20m) on scaffolding between 2nd and 4th floors on the south elevation. However, these proposals differ from the current application proposals being considered here in so far as the 2013 approval (2013/4086/A) involved the installation of a shroud on scaffolding that covered the whole of each elevation of the building, incorporated a 1:1 image of the building façade, and used only a small percentage of the shroud surface area for commercial advertising (approximately 12%) in accordance with the above guidance.
- 3.10 Overall therefore, it is considered that the proposed shroud advertisement, even for a temporary period, would be harmful to the character and appearance of the wider streetscene, the adjacent conservation areas, and within the settings of the nearby listed buildings, by reason of its' size, design and location, contrary to Camden Planning Guidance and policies D1, D2 and D4 of the Camden Local Plan 2017.
- 3.11 Special regard has been attached to the desirability of preserving the listed buildings, their settings, and the features of special architectural or historic interest, under s.66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended by the Enterprise and Regulatory Reform Act (ERR) 2013.

Residential amenity

- 3.12 Policy A1 (Managing the impact of development) seeks to protect the amenity of Camden's residents by ensuring the impact of development is fully considered and by only granting permission or consent for development or alterations that would not harm the amenity of communities, occupiers and neighbouring residents.
- 3.13 It is considered that the proposal would not disturb residents or occupiers, especially due to the location and absence of illumination, and would not cause harm to neighbouring amenity in terms of light-spill, glare, light projection, or any harmful impact on outlook, and as such, the proposal accords with policy A1 and with Camden Planning Guidance.
- 3.14 The proposal therefore raises no residential amenity concerns.

4. Transport and public safety

- 4.1 Policy D4 of the Local Plan states that advertisements will not be considered acceptable where they impact adversely upon public safety, including where they distract road users because of their unusual nature. Policy T1 (Prioritising walking, cycling and public transport) and CPG (Transport) both seek to ensure that there is no adverse impact on the highway network, the public footway and crossover points from any proposed development.
- 4.2 Taking into account the regular pace of the traffic going through this a part of Camden and the vehicular and pedestrian crossover and interchange points, the proposal is considered unlikely to obscure or hinder any road traffic sign or traffic lights, nor introduce any undue distraction or hazard in public safety terms, especially given the absence of illumination, and as such, would not be harmful to either pedestrian or vehicular traffic. As such, the proposal accords with policies T1 and D4, and with Camden Planning Guidance.
- 4.3 The proposal therefore raises no public safety concerns.

5. Further information

- 5.1 In accordance with paragraph 38 of the National Planning Policy Framework 2019 that encourages the Council to work in a positive and proactive way with the applicant, the concerns raised in section 3 of this report were brought to the applicant's attention at an early stage to allow the opportunity for revised proposals to be submitted that might include an advertisement that covers a smaller proportion of a shroud. However, after initial consideration along these lines, the applicant declined this opportunity and confirmed that they wanted the application to be determined based on the original proposal.
- 5.2 It should also be noted that the red outline of the application site boundary as shown on the submitted site location plan (ref. 001) surrounds the construction site and does not include the application site itself which is located over the public highway to the south. The Council advised the applicant to amend the site location plan so that the application site would be outlined in red and included within this boundary; however, an amended site location plan has not been received from the applicant.

6. Recommendation

- 6.1 It is therefore recommended that advertisement consent be refused for the following reason:
- 6.2 The proposed advertisement, by virtue of its size, design and location, even for a temporary period, would introduce visual clutter detrimental to the character and appearance of the wider streetscene, the adjacent conservation areas, and would be harmful within the settings of the nearby listed buildings, contrary to policies D1, D2 and D4 of the Camden Local Plan 2017.