

Regeneration and Planning
Development Management
London Borough of Camden
Town Hall
Judd Street
London
WC1H 9JE

21 February 2020

Application for Advertisement consent at 102 Cricklewood Broadway, London, NW2 3EJ - Conversion of poster advertisement display to D-poster

Dear Sir/Madam,

Wildstone Planning have been instructed by GWR Property Co Ltd to submit an application for express advertisement consent under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (the "Regulations") to upgrade an existing advertisement at the above address. The existing advertisement benefits from deemed consent under Class 13 of the Regulations as it has been in situ for a continuous period of over 10 years.

This upgrade is part of a process within the advertising industry to modernise advertising by utilising new display technology that is lightweight and can be erected with limited additional engineering, as the digital poster weighs little more than the paper and paste poster it will replace. The quality of the image produced will mimic that of a traditional poster, with the overall aim being to replace like for like with no adverse impact on visual amenity.

The Proposal

The proposal seeks to "repost" the existing display at 102 Cricklewood Broadway, London, NW2 3EJ, with a "D-poster" which will display multiple static advertisements on rotation.

The proposals allow the existing advertising network to be better managed, monitored and maintained, to meet modern requirements of advertisers. This will bring a wide range of benefits as follows:

- Upgrade of sites lacking in investment;
- Reduction in vehicle trips for reposting adverts;

-
- Consolidation and overall reduction in the number of billboards in the network;
 - Eradicating the need to print posters and avoiding the associated waste involved in the production process;
 - Ability to broadcast emergency messaging;
 - Ability to use void periods for non-commercial campaigns;
 - Opportunity for more creative real time and locally relevant advertising;
 - Opportunity to integrate additional hardware to meet Smart City objectives.

Content will be controlled remotely in real time from a Networks Operation Centre (NOC) and the site will be monitored remotely 24/7 to facilitate responsive maintenance. Diagnostics software will report any faults back to the NOC and a kill switch will turn the content to black until it can be resolved.

In order to ensure that the nature of the advertisement does not substantially or materially change, it is proposed to control its operation via condition. Suggested conditions include:

- Static images to be displayed only (no moving or flashing images);
- Changes between adverts to take place instantly with no sequencing, fading, swiping or merging of images;
- Maximum level of night time illuminance to be set to 300cd/m2 in accordance with ILP Guidelines;
- Advertisements to change no more frequently than once every ten seconds.

The above conditions are industry standard and are now commonly seen applied to applications of this type. Where circumstances demand, additional controls or variations of these conditions may be acceptable to the applicant.

It should be noted that the appropriate level of illuminance for digital signage varies depending on the level of ambient light in the surroundings. The Institute of Lighting Professionals (ILP) guidelines set a night time limit at which the display will not cause glare to drivers and will be appropriate within an urban or suburban character area (300cd/m2). The level of illuminance will be set on site manually to be at an appropriate level for the area and to mimic the poster being replaced. Whilst the ILP guidelines will represent the upper limit, the actual level of illuminance in all likelihood will be well below this. The displays are capable of being dimmed to within 1% of their maximum output and as such any concerns regarding levels of illuminance at a particular site can be dealt with swiftly and remotely. Lower levels of illuminance prolong the lifetime of the display and reduce electricity costs and as such there is an imperative to ensure that upgraded sites are not over illuminated.

The Site

The proposal site is located on the corner of Cricklewood Broadway and Richborough Road, the host building currently being occupied by Gammel and Company Estate Agents. The building currently supports a single, non-illuminated 96 sheet (3m x 6m) poster and paste billboard. The site surroundings are mixed in character, Cricklewood Broadway featuring

predominantly commercial units at ground floor level and residential units above. Richborough Road is mainly residential in nature, however a number of commercial units and a mechanics garage are in situ adjacent to the junction with Cricklewood Broadway.

Fascia advertising is located throughout the surrounding area, being apparent on the commercial units along Cricklewood Broadway. The proposal site is not located in close proximity to any nationally or locally listed heritage assets and is not located within a conservation area. Neither is the proposal site subject to any further planning designations as per the adopted Camden Policies Map.

The proposal site is an established location for advertising, having supported a 96 sheet billboard for over ten years. As the size and nature of the advertisement has not altered in over ten years the signage benefits from deemed consent under Class 13(1) of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

Planning Policy

The legislative framework for the control of advertisements is contained within The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (the "Regulations"). Regulation 3 states that advertising should be controlled in the interest of amenity and public safety, taking into account the provisions of the development plan, in so far as they are material, in addition to any other relevant factors.

The National Planning Policy Framework 2019 (NPPF) sets out the government's planning policies for England and how these are expected to be applied. In accordance with Paragraph 132 of the National Planning Policy Framework (NPPF) advertisements should be subject to control only in the interests of amenity and public safety, taking into account cumulative impacts. As described in the National Planning Practice Guidance (NPPG) the regime is a "lighter touch" than the system for obtaining planning permission for development. The NPPG also clarifies that a local plan does not have to contain advertisement policies and that if such policies are considered necessary to protect the unique character of a particular area, these should be evidence-based.

The development Plan for the area consists of the Camden Local Plan (adopted 2017) and Supplementary Planning Documents. Policy D4 'Advertisements' of the Local Plan states that the Council will support advertisements which:

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

The Council will resist advertisements that:

- *contribute to an unsightly proliferation of signage in the area;*
- *contribute to street clutter in the public realm;*
- *cause light pollution to nearby residential properties or wildlife habitats;*
- *have flashing illuminated elements; or*
- *impact upon public safety.*

As the application is a like for like upgrade and the principle of advertisement in this location has been established, the proposal is therefore in accordance with Policy D4 of the Local Plan.

The Council has published SPG in March 2018 in relation to advertising. The guidance states that billboards may be acceptable if an area has a mix of uses, provided that the billboard '*satisfactorily relate to the scale of the host building or feature and its surroundings*'.

Guidelines on when hoardings will not be considered acceptable include:

- *in locations where they may prevent or significantly damage views or obscure light;*
- *where they project forward of the face of adjoining buildings;*
- *where they project above roof ridge/eaves level;*
- *where they obscure architectural features or landmarks (including windows or window recesses); and*
- *on side walls where they would be unduly dominant.*

As the application is a like for like upgrade and the principle of advertisement in this location has been established, the proposal is therefore in accordance with Policy D4 of the Local Plan.

Planning Considerations

The proposal will not cumulatively increase the number of adverts in the area and overall digitisation of existing adverts will see a reduction in the amount of advertising. The like for like replacement of the display and the control over operation seeks to ensure that the change in the visual impact of the site on the surroundings is de minimus and not material. Nevertheless, it is acknowledged by the applicant that the illumination of the advert and the potential to increase the rate of change of the adverts would require express advertisement consent. The impact of these alterations have been considered in amenity and public safety terms as follows:

Amenity

As the proposal seeks to "repost" the existing advert and therefore mimic the existing situation, there will be minimal impact on visual amenity during the daytime. The size and positioning of the advertisement will remain the same and the level of illumination will be set to ensure that the proposed advertisement is not materially different from the existing position. The specification sheet provided within the planning drawings helps to illustrate the minimal difference between the existing type of display and the proposed replacement once controls are put in place. In fact, the proposed installation will be much slimmer and sleeker than the one that is currently in situ. At night time the introduction of illumination at the site represents a material change to the existing advert which is not currently illuminated. The controls proposed over the level of luminance will ensure that this material change does not cause material harm to amenity. The context of the surroundings, including illuminated shop signage/other illuminated adverts/street lighting establishes the site as appropriate for an illuminated advert

of this type. Additional controls over the display will be considered if necessary to remedy a specific amenity concern.

Public Safety

When assessing public safety, the key considerations are whether the location is appropriate (i.e. undemanding on the driver) and whether the level of illumination and the sequential change between advertisements is controlled to prevent distraction from the driving task. As the principle of an advertisement has already been established at this location, the Council must only consider whether the proposed controls are sufficient to ensure that there is no additional distraction which would cause an unacceptable impact on highway safety. Should the Council's Highways department identify any reasons why the location might be challenging to drivers, the applicant would be open to discussing alternative controls.

Conclusion

This application is part of a modernisation drive within the advertising industry to bring poster and paste billboards into the 21st century.

The proposal will not change the size, position or orientation of the advert. As such the established acceptability of the advertisement should not change materially. The proposed conditions to control the luminance of the screen and the operation of the digital screen will ensure that there is no additional harm to amenity or road safety.

For these reasons and the positive benefits set out above, it is considered that the application should be granted consent.

Application Submission

In order to complete the application, please find attached the following documentation:

- Completed application forms prepared by Wildstone Planning;
- Letter Statement prepared by Wildstone Planning (this letter);
- Architectural drawings prepared Wildstone Design;
 - PA-01 – Site Location Plan;
 - PA-02 – Existing Site Plan;
 - PA-03 – Proposed Site Plan;
 - PA-04 – Elevation AA;
 - PA-05 – Elevation BB; and
 - PA-06 – Specification.

Additionally, we will arrange payment to Camden Council for the sum of £462 to cover the cost of the Advertisement Consent application.

I trust that the above is clear and we look forward to receiving notification that the application has been registered in due course. Should you have any queries in relation to any of the attached information, please do not hesitate to contact me.



Yours faithfully,





Philip Allard
Planning Director

DD: 020 7243 9829

Email: philip@wildstone.co.uk

Wildstone Planning

 +44 (0)20 7313 9571

 info@wildstoneplanning.co.uk

 wildstoneplanning.co.uk

 22 Berghem Mews, Blythe Road, London W14 0HN

Company Registration No: 07275191 | Registered in England and Wales | Registered Office Address: The Station House, 15 Station Road, St Ives, Cambridgeshire PE27 5BH
Wildstone Planning is a trading name of Wildstone Capital Ltd