



Da Vinci House  
44 Saffron Hill  
London EC1N 8FH  
tel: +44 (0)20 3640 8508  
fax: +44 (0)20 3435 4228  
email: [info@iceniprojects.com](mailto:info@iceniprojects.com)  
web: [www.iceniprojects.com](http://www.iceniprojects.com)

Mr Jonathan McClue  
Planning and Built Environment  
London Borough of Camden  
5 Pancras Square  
London  
N1C 4AG

29 April 2020

Via Planning Portal

Dear Jonathan,

**TOWN AND COUNTRY PLANNING (CONTROL OF ADVERTISEMENT) REGULATIONS 2007 –  
APPLICATION FOR ADVERTISEMENT CONSENT FOR THE URBAN GALLERY, 1 ST GILES  
SQUARE, LONDON WC2**

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On behalf of Consolidated Developments Ltd please find enclosed an Advertisement Consent application for 1912 sqm of digital installations of the internal walls, ceiling and floor of the Urban Gallery located at 1 St Giles Square, London WC2.

**Background**

The advertisement displays proposed by this application are identical to those previously approved under express Advertisement Consent (LPA Ref: 2012/6863/A) which granted permission for the following:

*Installation of 1912sqm of internally illuminated intermittent digital LED display to the internal walls, ceiling and floor of the urban gallery in connection with the redevelopment of St Giles Circus site.*

This consent was granted on 31st March 2015 with no expiry date set by the LPA. Accordingly, under Regulation 14(7) of the Town and Country Planning (Control of Advertisements) Regulations 2007, the life of the express consent was set at a period of 5 years. Accordingly the expiry of the express consent was 31st March 2020.

Works took place throughout February and March 2020 in order to get the approved screens installed on site and works were programmed to complete installation and have the screens live by 30th March 2020. Works to install the screens were well advanced before the rapid escalation of the Coronavirus pandemic caused all construction activity to cease on site on 24th March 2020. As a result, the installation and display of the advertisements could not be completed prior to the expiration of the express consent and a new Advertisement Consent is thus required.

**Context for the Proposals**

Planning permission was granted on 31<sup>st</sup> March 2015 for the redevelopment of St Giles Circus for the following description of development:

*Redevelopment involving the erection of three buildings (5 and 7 storey buildings facing Centre Point Tower and a 4 storey building on Denmark Place), following the demolition of 1-6, 17-21 Denmark Place and York and Clifton Mansions with retained facades at 1-3 Denmark Place and York and Clifton Mansions to provide 2895sqm of basement Event Gallery space to be used for community events, exhibitions, product launches, live music (including recorded music), awards ceremonies, conferences and fashion shows (Sui Generis); a 678sqm urban gallery with 1912sqm of internal LED screens to be used for circulation space, retail, advertising, exhibitions, brand and product launches, corporate events, screenings, exhibitions and events (including recorded music),(Sui Generis); 884sqm of flexible retails and restaurant floorspace (Class A1/A3); 2404sqm of restaurant floorspace (Class A3); 385sqm of drinking establishment (Class A4) and a 14 bedroom hotel (Class C1) between Denmark Place and Andrew Borde Street. Change of use of 4, 6, 7, 9, 10, 20-28 Denmark Street, 4 Flitcroft Street and 1 Book Mews to provide 4,308sqm of office floor space (Class B1a); 2,959sqm of private residential floor space (Class C3); 239sqm of affordable housing (Class C3) and 2540sqm of retail floor space (Class A1). Provision of a new pedestrian route from Andrew Borde Street to Denmark Street at ground floor level and associated partial demolition at 21 Denmark Street (all GEA)*

A number of minor material amendments to the original consent have been approved but for all intents and purposes the implemented development remains as per the original consent.

## **The Proposals**

This Advertisement Consent application is for the installation of 1912 sqm of internally illuminated intermittent digital LED display to the internal walls, ceiling and floor of the Urban Gallery in connection with the redevelopment of the wider St Giles Circus site.

The Urban Gallery is formed within the larger of the two newly constructed buildings facing onto St Giles Square and consists of an internalised open space for use by members of the public passing through the site, or for people visiting the site as a destination in its own right. The building is fully openable at ground floor on three sides and on two sides at floors 1-3 of the building, enabling physical and visual permeability through the building from Charing Cross Road, St Giles Square and from the Tottenham Court LUL and Crossrail station.

The Urban Gallery forms part of The Outernet ([www.outernetglobal.com](http://www.outernetglobal.com)) which will be the first of a global network of immersive entertainment districts showcasing music, film, arts and retail experiences. The digital LED screens are central to The Outernet operation, providing a carefully curated digital environment. The proposals represent a move away from conventional advertising, seeking to engage people in new and relevant ways. For a space to be relevant and engaging to its users, it needs to offer the chance for interaction. People are becoming increasingly immune to conventional advertising and it is not benefitting the retail offer of our high streets or the experiences of people in our city.

It is proposed that the digital skin will be used to interact and engage with people. One way to consider this is to think of an Apple iPad. The iPad is engaging because of its applications. It has apps for useful information – like local information and weather. It has apps for news, for staying connected, for travel and wayfinding, for music and for brands to reach their audiences in new ways. The Outernet can be thought of like an ever-changing media channel that provides information like the iPad, whilst also receiving information from its users and programmers. It is always changing, informing, entertaining and educating.

## **Planning Considerations**

The National Planning Policy Framework (NPPF 2019) notes that the quality and character of places can suffer when advertisements are poorly sited and designed (paragraph 132). The NPPF also notes

that advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.

### **Amenity**

The proposed advertisements – which have already benefitted from express consent – will be located within a commercial building within Central London. The screens are integral to the wider redevelopment of the St Giles area and form part of The Outernet which will provide substantial benefits in regards to function, amenity and quality of the surrounding spaces as part of an integrated approach to retail function and the use of public realm moving forward.

It is relevant to any assessment of amenity that there are planning conditions attached to the extant planning permission for the wider redevelopment of the area (LPA Ref: 2012/6858/P) which control the luminance and the acoustic levels of the screens within The Outernet building. These are as follows:

- 25 Prior to occupation of the urban gallery in building A a lighting report shall be submitted to and approved in writing by the Local Planning Authority detailing how the artificial lighting within the urban gallery (digital screens and any other lighting) shall not increase the pre-existing illuminance (lux levels) at adjoining and/or nearby light sensitive locations when the screens and lights are in operation;
- 26 Prior to occupation of any of the approved uses, a Noise Management Plan shall be submitted to and approved in writing by the Local Planning Authority, having regard to condition 27 and including a noise mitigation strategy, detailing:
  - The location and direction of any speakers in the urban gallery;
  - Method of transporting deliveries, refuse and associated servicing to and from the service bays on Denmark Street, including any bottle crushing;
  - Location of smoking areas;
  - Location of external tables and chairs;
  - The operation of the upper floor louvers to building A and B; and
  - The use of the residential roof terrace at 21-25 Denmark Street.

As such no detrimental impact on residential amenity is expected as a result of the proposals.

It is noted that the site lies within the Denmark Street Conservation Area however the context within which the Urban Gallery sits is that of the new St Giles Square and the above-station development on the west side of Charing Cross Road. Furthermore the operation of the Urban Gallery as part of The Outernet is rooted within the music heritage of Denmark Street and as such the proposals are considered to be wholly appropriate in visual amenity terms.

### **Public Safety**

Planning Policy Guidance (PPG) (as updated) notes that all advertisements are intended to attract attention but advertisements at points where drivers need to take more care are more likely to affect public safety. The PPG notes that there are less likely to be road safety problems if the advertisement is on a site within a commercial or industrial locality, if it is a shop fascia sign, name-board, trade or business sign, or a normal poster panel, and if the advertisement is not on the skyline.

Research on roadside advertising suggests that drivers always give priority to the driving environment taking in non-essential information according to road conditions and whether there is sufficient 'spare capacity' to perform such tasks. Where external stimuli are present drivers tend to adopt a 'glance'

strategy taking repeated short duration views of less than 1 second to either side of the vehicle's path but maintaining awareness of vehicle conditions.

Notwithstanding this it is expected that, as a worst case scenario, some southbound drivers on the short stretch of Charing Cross Road running south towards the site may be distracted by the screens when they are at their most visible. As the southbound running lane is restricted to bus and taxis only it is considered that these users will become accustomed to the digital screens and therefore the 'novelty effect' on these users will diminish over a relatively short time.

Although pedestrians will be giving attention to the screens it is felt that when the pedestrian phase of the controlled crossing is running their attention will be drawn to the road. It is not thought that the distraction would lead to pedestrians inadvertently entering the carriageway.

A detailed Road Safety Assessment to examine the potential effects of the proposed digital screens on public safety was submitted in support of the original Advertisement Consent application (granted in 2015). On review it is still considered to be relevant and it is therefore submitted in support of the current application, with an accompanying addendum note.

### **The Submission**

In support of this Advertisement Consent application please find enclosed the following:

- This covering letter;
- Red Line Plan;
- Drawings, plans, sections and elevations prepared by ORMS;
- Road Safety Assessment prepared by TMS (with addendum prepared by Iceni).

I trust the enclosed is sufficient for your current purposes and I look forward to receiving confirmation that the application has been validated. In the meantime, please do not hesitate to contact me on [asnow@iceniprojects](mailto:asnow@iceniprojects) if you require anything further or wish to discuss any point in more detail.

Yours sincerely,



Anna Snow  
DIRECTOR