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18<sup>th</sup> May 2020

2020/1910/A

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### **Our consultation response to application 2020/1910/A**

The BCAAC is the advisory committee for Camden's Central London conservation areas, with the exception of Hatton Garden. This application concerns large advertisement screens at 1 St Giles' Square, which fall within Subarea 1 (Denmark Street area) of the Denmark Street Conservation Area.

We understand that this application is simply being renewed due to an expiration of a previously approved application, partly due to the coronavirus pandemic. However we have decided to raise a new objection on the grounds of negative visual and aural impact upon the Denmark Street Conservation Area.

In determining this application we would draw attention to the Town and Country Planning (Control of Advertisements) (England) Regulations 2007. Regulation 3(1) states that:

*'a local planning authority shall exercise its powers ... in the interests of amenity'*

where amenity is defined in Regulation 2(1) as *visual and aural amenity*. Regulation 3(2)(a) states that:

*'factors relevant to amenity include the general characteristics of the locality, including the presence of any feature of historic, architectural, cultural, or similar interest.'*

It should therefore be considered whether the visual and aural impact of these advertisement boards are in keeping with the Denmark Street Conservation Area and surrounding listed buildings.

The appraisal and management strategy for the Denmark Street Conservation Area sets out the area's special interest and Camden's approach to its management. There are no references to any positive impact which advertisement has upon this conservation area, and on the contrary 6.8.2 states that:

*Hoardings, because of their size and scale, are not considered acceptable forms of advertising within the conservation area. New development may increase pressure for*

*more intensive advertising. This will be resisted where it is considered to detract from the character and appearance of the area.*

The visual character of the proposed advertisement in our opinion assumes that of a hoarding, and at any rate certainly assumes the *size and scale* of a hoarding. It therefore appears that Camden should consider these advertisements unacceptable.

We would also like to draw your attention to Policy D4 of the Camden Local Plan, which sets out the Council's approach to advertisement consent:

*...the Council will resist advertisements that:*

- ...  
e. cause light pollution to nearby residential properties...*
- f. have flashing illuminated elements*

while 7.83 and 7.85 go on to emphasise further resistance to advertisements which have negative impacts upon heritage and amenity. Camden's planning guidance on advertisements sets out further resistance to advertisements of this size, scale, location, and illumination, and also within the sensitive historic setting of conservation areas and listed buildings.

With regard to the aural impact of these advertisements, there is no precedent for such a form of advertisement in any area of Camden or London to our knowledge and on the contrary noise emitted from premises is generally considered unacceptable and a threat to environmental health. In heritage terms, we believe the noise to detract from the special character of the conservation area by providing an unwelcome distraction which will hinder the enjoyment of the area's special character.

## **Conclusion**

It appears that approval of this application would be contrary to Policy D4 of the Camden Local Plan and regulation 3(1) of the Control of Advertisements regulations, while the application would also fail to preserve and enhance the special appearance and character of the Denmark Street Conservation Area. There is very little public benefit in our opinion to outweigh this harm, besides the advertisement space which will be given over to local businesses. In our opinion, this does not outweigh the great weight that should be afforded to the conservation of designated heritage assets.

We therefore hope that this application will be **rejected**.

**Bloomsbury Conservation Areas**  
Advisory Committee

18<sup>th</sup> May 2020