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via: Jonathan.McClue@Camden.gov.uk

14th May 2020

Dear Jonathan,

Re application ref. 2020/1910/A for the installation of c. 2,000 sqm of internally illuminated intermittent digital LED display to the internal walls, ceiling and floor of the urban gallery at 1 St. Giles Square, in connection with the redevelopment of St Giles Circus site.

Covent Garden Community Association OBJECTS to this application in its current form. The reasons for objection are listed below.

However, we believe that these objections can largely be addressed via some simple controls that in no way jeopardise the development plan and re-starting building work. These can easily be achieved through conditions attached to any consent notice, along the lines of:

1. Opening hours of fascia vanes in the walls to be limited in hours to 8am – 10pm, and reviewed through local consultation after 3 months of operation - the LPA reserving the right to ameliorate any problems by changing the conditions on hours of opening, or by permanent closure of the vanes.
2. TfL's restrictions on moving images and brightness to be included, and no sound from the advertisement equipment to be allowed to emanate from the space.
3. Any content shown on the screens to be restricted to:
 - The equivalent of 'U' classification in films, and
 - Non-political subject matter, and
 - No moving images.

The opportunity is presented to reconsider this installation. We believe that the LPA should take it up, in order to promote the wellbeing of road-users, the local community and those passing by / through the site.

You did give consent in March 2015 to illuminated LEDs under application ref. 2012/6863/A. This consent has now expired. There have been significant contextual changes since, and we believe that these must be considered in granting any new consent. They include the Camden Local Plan adopted in 2017.

It is also unfortunate that fuller consultation did not take place at that time, in view of the scale and impact of the proposals. Had this been done, stakeholders could have worked together towards an appropriate solution then. The only objection that you received at the time seems to have been from Westminster City Council, with no comments sought from neighbouring amenity groups nor those looking after the interests of the conservation areas all around this site, including us at Covent Garden Community Association.

But we are where we are with this. And we would like to be constructive.

The main problem with these screens is the applicant's repeated claim that they "will be located within a commercial building".

Were this the whole story (ie: were the gallery a completely enclosed, private space) then we do not believe that there would be any serious problem.

But the reality is that the building is openable on two sides, which means that **the advertisements are clearly visible out in the open street and from surrounding conservation areas. The content is therefore not really 'within' a building at all.**

This leads to a number of issues, which we believe should be managed by conditions:

1. Danger to road users

TfL has submitted new comments to you dated 05/05/2020, expressing concerns that the advertisements as proposed will not be safe. They are likely to distract drivers travelling South down Tottenham Court Road and will remove the focus of attention for pedestrians at a busy junction.

The impact can clearly be seen from the applicant's mock-up of the view from Tottenham Court Road.



Two recent contextual changes are important here:

- (i) At the time of the application there was no southbound traffic on Tottenham Court Road, but it is now two-way. This means that, when the façade vanes are open, any advertisements will dominate the view for traffic passing down the road and across the busy junction. Buses, taxis and cycles are allowed during the day and, once the roadworks for the West End project are finished, cars will be allowed in the evening (the application wrongly asserts that only buses and taxis will be affected).
- (ii) Cycling is being promoted as a mass mode of transport in London, with large numbers of inexperienced cyclists now taking to the roads.

It is also important to note that traffic arrangements can be changed at any time; private cars may one day be permitted southbound down Tottenham Court Road and Charing Cross Road at all times, as they were in the past.

At the outset the LPA needs to ensure that potential distraction is minimised in accordance with the Local Plan paragraph 7.86. TfL has suggested limits on the use of moving images and brightness, with which we agree.

And, if despite these limits, there are problems for road users, then the LPA needs to be able to reconsider the arrangements, and if necessary require that the façade vanes be closed permanently. This is why a trial period is required, with subsequent consultation.

2. Harm to amenity

The previous application was objected to by City of Westminster as follows:

Reason(s) for Objection:

- 1 The proposed advertisements are considered wholly unacceptable, by reason of their design, appearance, size and location. They will be seriously harmful to the setting of the Soho Conservation Area, to local views and the settings of adjacent listed buildings.

The potential impact of screens several storeys high can be seen from the architect's plans:



The current application must be considered in the changed context of the Camden Local Plan adopted in 2017. Indeed, we are doubtful if consent would now be given to the gallery as designed under the principles of Policy D4 (Advertisements). However, we wish to be reasonable given the half-built situation, and therefore ask that, rather than refusing consent entirely, the LPA condition any new consent to try to achieve the aims of the policy as much as possible.

Of particular relevance is the D4 requirement that advertisements “preserve or enhance the character of their setting”. The policy states that “We will support advertisements that preserve the character and amenity of the area” and that “We will resist advertisements that ..cause light pollution to nearby residential properties ... have flashing illuminated elements; or impact upon public safety.”

Of relevance also is policy in relation to the Tottenham Court Road growth area, where the aspiration is stated for “development of the highest quality, as befits this historic area in the heart of London, which

preserves local amenity and seeks to enhance and conserve the significance of heritage assets such as the character and appearance of conservation areas.”

St. Giles Square lies within a family area for leisure and retail. It is also a family area for living, with dense residential development (ancient and modern) across St. Giles, Covent Garden, Bloomsbury, Fitzrovia and Soho – we estimate a population of about 20,000 people within 3 minutes’ walk. There is a block of flats at Shaldon Mansions right next to the gallery building on Charing Cross Road. And Centrepoint House is directly across the square from the gallery, a building with 36 flats. There are many more existing dwellings all along Charing Cross Road and around Tottenham Court Road, and in the immediate back streets. More dwellings are planned.

Besides policy and additional residential redevelopment, other relevant context has changed since the initial planning application 8 years ago. For example:

- The importance of the centres of our cities for residents is more recognised – and the changes wrought by Covid-19 are likely to lead to even more residential use.
- Mental health is now openly discussed. The impact of a too fast-moving environment with changing images, insistent messages and marketing pressure is better understood.
- Explicit images are widely used in advertising.
- Imagery and news feeds can be influenced by interested parties, normalising propaganda through channels that in the past enjoyed a high level of trust.

The applicant states that they seek “to create an exciting and dynamic building which responds to people, its context and the wider city.”

In order to “respond to people” the advertisements must, at the very least, not make people feel uncomfortable. We suggest a ‘U’ classification on all content, and a ban on political content.

In order to “respond to people” the advertisements should also not cause people stress. So the advertisements should not flash, move quickly or be too bright.

In order to “respond to context” the advertisements should take account of the densely residential nature of the area close to the building and the conservation areas. No noise should emanate from the building as a result of the equipment or its content. The hours at which the gallery’s facades are open must also not be antisocial - but we cannot see where the “general timings proposed” by the applicant are offered as a condition and therefore enforceable. In any case the general timings proposed are too early and late for local families, being 7am – Midnight 7 days a week. We suggest that 8am - 10pm would be more reasonable, with a shorter window preferable on a Sunday.

Please let us know when we can attend any hearing at which this application is discussed.

Yours sincerely,

Elizabeth Bax
Chair, Planning Subcommittee

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