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Via Planning Portal only

1st September 2020

Dear sir/madam,

DISPLAY OF A TEMPORARY SCAFFOLD SHROUD WITH REPLICA OF BUILDING FAÇADE TO FRONT AND SIDE ELEVATIONS FOR A PERIOD OF 12 MONTHS – RENEWAL APPLICATION

KOKO, 1A CAMDEN HIGH STREET, LONDON, NW1 7JE

Please accept this covering letter as an accompaniment to this advertisement consent application to display a temporary scaffold shroud with a replica of the building façade to the front and side elevations at 1A Camden High Street for a period of 12 months.

The Site:

The application site is located at the southern end of Camden High Street at the corner of Crowndale Road and Eversholt Street and comprises the renowned live music venue, known commonly as KOKO.

The building is composed of an early 20th century structure, four stories in height with a symmetrical ornate façade. The building is Grade II listed, and is located within the Camden Town Conservation Area.

The immediate surroundings are characterised by a range of retail/commercial uses at ground floor level and small units of residential accommodation/storage spaces above.

Planning History:

Full planning permission (2017/6058/P) and listed building consent (2017/6070/L) were granted on 02 May 2018 for the extension, refurbishment and restoration of the building. The permissions are in the process of been implemented.

An advertisement consent application (2018/5200/A) for the *temporary display of a shroud with 1 externally illuminated commercial advertisement (using 13 spotlights) on the Camden High Street elevation* was latterly submitted in order to correspond with the refurbishment works listed above. The advertisement consent application was however refused for the following reason:

The temporary display of the proposed externally illuminated commercial advertisement, by virtue of its size, design, location and method of illumination would result in a dominant and incongruous fixture in the streetscape that fails to preserve or enhance the character and appearance of the Camden Town Conservation Area and streetscape, and would be harmful to the setting of the host and surrounding listed buildings, contrary to policy D4 (Advertisements) of the Camden Local Plan 2017.

In the context of the above refusal, a latter application (2019/3219/A) sought advertisement consent for a non-illuminated scaffold shroud with a 1:1 replica image of the host building. The application proposed that the shroud would also accommodate a centrally located non-illuminated advertisement panel measuring 9 metres by 4.4 metres on its front elevation. The application was granted consent on 2nd September 2019 for a temporary period of 12 months from the date of the decision. However, the programme of works have been delayed as a result of the ensuing Covid-19 outbreak and the advertisements the subject of this consent not displayed for the consented 12 month period.

The Proposal:

As above, the programme of works to the building have been delayed and the associated advertisement consent application, that expires on 2nd September 2020, not fully implemented for the consented 12-month period. This was exacerbated by an unfortunate sequence of events that saw a fire seriously delay the programme.

This application therefore seeks to renew the existing consent. That sought, in the context of the previous refusal, consent for, a non-illuminated scaffold shroud with a 1:1 replica image of the host building. It is proposed that the shroud will also accommodate a centrally located non-illuminated advertisement panel measuring 9 metres by 4.4 metres on its front elevation.

This proposal will screen unsightly views of the building works by wrapping the scaffolding with a PVC mesh and will meet health and safety obligations during construction. It is proposed that the shroud will be erected for a period of 12 months during the period that the refurbishment and restoration works take place.

The application has been framed by the previous refusal which raised concerns about the level of illumination and the size/design/location of the advertisement. The proposal in this

instance is for smaller, non-illuminated advertisement space, thereby facilitating a significantly improved scheme and indeed, one previously approved by the Council.

The impact of the advertisement consent application has already been considered by the Council under the previous consent when the proposal was judged to comply with planning policy including the Council's design guidance for advertisements in Conservation Areas.

Legislative Provision:

Regulation 3 of The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (as amended) requires that local planning authorities control the display of advertisements in the interests of amenity and public safety, taking into account the provisions of the development plan, in so far as they are material, and any other relevant factors.

Therefore, unless the nature of the advertisement is in itself harmful to amenity or public safety, consent should not be refused. These matters are considered further below.

Planning Policy:

National

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied.

Paragraph 132 of the NPPF states that *"...A separate consent process within the planning system controls the display of advertisements, which should be operated in a way which is simple, efficient and effective. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts."*

Paragraph 005 of the National Planning Practice Guidance (NPPG) states that sites *'... which have scaffolding or netting around them may be considered suitable as temporary sites for shroud advertisements or large 'wrap' advertisements covering the face, or part of the face, of the building'*.

Local

For the purposes of this application, the adopted development plan for the London Borough of Camden comprises the London Plan (2016), the Local Plan (2017) and Camden Planning Guidance Documents on Advertisements (2018), Design (2019) and Amenity (2018).

The development plan usefully sets out the local policy context. Camden's Planning Guidance on advertisements states that *'shroud advertisements come in a range of forms but are generally largescale and can cover the entire elevation of a building. They can help to shield unsightly construction work, reducing visual impact. However, 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, where the advertisement partially obscures a building, the visual appearance of the building itself.'*

The guidance further provides a criteria-based assessment in stating that... *'shrouds on scaffolding (erected for the purposes of carrying out building works and removed upon completion), 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;*
- *The 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 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.*

Policy D4 (Advertisements) of the Camden Local Plan 2017 states that *'The Council will require advertisements to preserve or enhance the character of their setting and host building. Advertisements must respect the form, fabric, design and scale of their setting and host building. The Council will support advertisements that preserve the character and amenity of the area; and preserve or enhance heritage assets and conservation areas.'*

Planning Analysis:

Principle of development

In sustainable locations, there are no development plan or national planning policies that restrict the display of advertisements in principle.

It is widely acknowledged that appropriate signage is essential to the economy and is therefore suitable in such locations. The ongoing Covid-19 pandemic is identified as an

economic, as well as a health crisis, and steps to stimulate the economy, as is proposed here, are therefore considered crucial in this context.

Matters of visual and residential amenity and public safety are considered in more detail below.

Amenity:

National and local planning policy acknowledges that shroud advertisements help to shield unsightly construction work, thus reducing visual impact. However, shroud screens are inevitably of a scale that could be perceived to cause harm in alternative ways, simply by virtue of the area they would typically cover. Therefore, Camden's Planning Guidance advises further on shroud advertisements.

In this instance, the character and appearance of the immediate area is predominantly commercial and is largely dominated by the physical presence of large buildings and the traffic-dominated character of the junction where the application site sits. Most notably, this creates a large-scale, busy and dynamic environment.

The building is an iconic and established, visual landmark in Camden, owing to the buildings' distinctive architectural features and historical use. While the associated renovation works take place, the building will require scaffolding covering the front and side of the building.

To reduce the impact of the development on the amenity of the area, the proposal will wrap the scaffolding with a high-quality image of the existing building. The size and positioning of the proposed inset advertisement has been carefully designed and considered in relation to the building and the features of the facade that will be replicated on the shroud and have been significantly reduced in size from a previous iteration of the scheme and will be non-illuminated.

The proposed 1:1 section of the banner will wrap around the front facade of the building and have a positive impact on the streetscene, representing a high-quality alternative to what is often poorly presented plastic sheeting or netting. It will not exceed the height and length of the existing building.

The proposed advertisement space on the front elevation of the building represents an approximate 13% coverage of the facade. While this exceeds the recommended guide of 10% it is noted that the space has been designed to respond to the characteristics of the building by using its natural contours and ornate detailing as a frame. The significantly reduced advertisement space would be non-illuminated and is considered appropriate in this context, sensibly corresponding to the built fabric without dominating the elevation.

It is acknowledged that the site is prominently located and it is for this precise reason that the shroud (and associated advertisement space) will serve to protect and enhance the character of the area during a period of construction works.

Impact on Listed Building:

Policy D2 of the Local Plan refers specifically to heritage and requires consideration of whether a proposal sustains and enhances the significance of a particular heritage asset, making a balanced judgement having regard to the scale of harm and the significance of the heritage asset. As a Grade II listed building, the significance of the heritage asset is acknowledged.

However, the proposed shroud will extend to cover the main facades of the building and will include a 1:1 replica of the building's appearance. The advertisement element of the proposal would be centrally located in the front facade in a location which will allow the form of the building, its columns, pilasters and ornate details to be read from the public realm.

Notwithstanding the subservient nature of the advertisement space, the shroud is intended to protect the character of the area during a time of refurbishment works where the site would otherwise have appeared as an incongruous part of the street scene. By proxy therefore, this ensures the setting of the listed building is maintained and most pertinently, this is an application for a temporary period of 12 months only while works take place.

Public Safety:

The character and appearance of the immediate area is predominantly commercial and is traffic intense.

In this context, it is highly unlikely that an advertisement of this scale would cause harm to public safety and this inference is substantiated by the officer report linked to the previous refusal of consent whereby the council raised no objection to the scheme on the grounds of public safety. In this case, the non-illuminated nature of the advertisement will ensure that the impact on public safety would be limited further and no grounds therefore exist that would warrant a refusal on these grounds.

Summary & Conclusion:

The proposal is for the temporary display of a scaffold shroud to the front and side of the Koko building with a 1:1 replica of the building's façade. Non-illuminated advertisement space

is provided to the front elevation at a ratio of 13% which, for the reasons outlined above, is appropriate in the context of the site and surroundings.

The proposal is acceptable with regard to public safety and visual amenity and therefore accords with the principles of both national and local planning policy. Consent has previously been granted for the works but the advertisements were never displayed for any meaningful length of time, and in any case well below the 12 month period of consent, because of the onset of the Covid-19 pandemic and an unfortunate fire. It is therefore respectfully requested that consent be granted.

The application is further supported with the following plans/documents:

- Site Location Plan
- Site Plan
- Existing Elevations
- Proposed Elevations
- Existing View
- Proposed View
- Proposed Standard Specifications

I trust the commentary above is clear but if you require any points of clarification or have any questions please do not hesitate to contact me.

Yours sincerely

Stuart Minty
Director
SM Planning