

<b>Delegated Report</b>  (Refusal)		<b>Analysis sheet</b>		<b>Expiry Date:</b>	24/08/2020
		N/A		<b>Consultation Expiry Date:</b>	29/06/2020
<b>Officer</b>			<b>Application Number(s)</b>		
Josh Lawlor			1) 2020/2878/P 2) 2020/3341/A		
<b>Application Address</b>			<b>Drawing Numbers</b>		
Vent Shaft of Euston Square Underground Station Euston Road London NW1 2AF			See decision notices		
<b>PO 3/4</b>	<b>Area Team Signature</b>	<b>C&amp;UD</b>	<b>Authorised Officer Signature</b>		
<b>Proposal(s)</b>					
1) Erection of steel envelope (cladding) on steel frame fixed onto existing concrete vent shaft (Sui Generis) 2) Display of an internally illuminated LED digital advertising board on west elevation of steel frame fixed onto existing vent shaft					
<b>Recommendation(s):</b>		1) Refuse Planning Permission 2) Refuse Advertisement Consent			
<b>Application Type:</b>		1) Full Planning Permission 2) Advertisement Consent			

Conditions or Reasons for Refusal:	Refer to Decision Notices					
Informatives:						
Consultations						
Adjoining Occupiers:			No. of responses	00	No. of objections	00
Summary of consultation responses:	<p><b>Site Notices</b> were displayed on 31/07/2020 expiring on the 24/08/2020 in the following locations:</p> <ul style="list-style-type: none"><li>- Outside UC hospital</li><li>- Outside No. 250 Euston Road</li><li>- Outside Euston Tower (No. 286)</li><li>- Outside No. 293 Euton Road (by Warrent Street tube station)</li></ul> <p>A <b>Press Advert</b> was published on and 06/08/2020 and expired on 30/08/2020</p> <p>No objections or comments were received from adjoining occupiers</p>					
TfL Engineering Infrastructure Protection	<p><i>TfL Engineering Infrastructure Protection made the following comment on 29/01/2021, following a previous objection:</i></p> <p><i>‘I can confirm that the planning applicant is in communication with London Underground engineers with regard to the development. Subject to the applicant fulfilling the legal requirements in place and formed under agreement with London Underground we have no objection to make on this planning application.</i></p> <p><i>This response is made as Railway Infrastructure Manager under the “Town and Country Planning (Development Management Procedure) Order 2015”. It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities’.</i></p>					

## Site Description

The application site relates to an existing concrete 'T' shaped vent shaft, which is located on a section of footway that runs in between Gower Street and the Euston Underpass, at Euston Circus, close to University College of London Hospital (UCLH). The shaft provides ventilation to the tunnels for the adjacent Euston Square Underground Station located on the corner of Gower Street with Euston Road to the north-east. The concrete vent structure is clad in timber and has a backlit advertisement display affixed to the north facing façade. The area around Euston Circus is characterized by medium and high rise commercial buildings in institutional and commercial use.

The site is not in a conservation area and is not listed, nor are there any listed buildings within the immediate vicinity.

## Planning History

### Site History:

**2004/2410/A** Display of internally illuminated poster panel measuring 3m x 4m on northern elevation of ventilation shaft to replace existing panels. **Granted on 23/06/2004**

**2019/0754/P** Erection of steel envelope (cladding) on steel frame fixed onto existing concrete vent shaft, and installation of green walls on both side (Sui Generis). **Refused 10/04/2019 and Dismissed at appeal 09/10/2019 under refs. APP/X5210/H/19/3227881 and APP/X5210/H/19/3227883** (appeal decisions summarised below)

### Reasons for refusal:

- 1) The steel frame and steel envelop, by virtue of their size, scale, design, location and materials would be bulky, incongruous and overly dominant features that would not relate to the surrounding area, and would detract from the clutter free aspect at high level on the highway. These elements of the proposal are considered to be an unsympathetic and unacceptable form of development that would be detrimental to the character and appearance of the streetscape and surrounding locale, contrary to policy D1 (Design) of the Camden Local Plan 2017.
- 2) The steel frame and steel envelop, by virtue of their size, scale, design and location, are an unacceptable form of development that would be detrimental to the free movement of pedestrians and cyclist and would create an obstacle to the visually impaired, contrary to policy T1 (Prioritising walking, cycling and public transport) of the Camden Local Plan 2017.

**2019/0131/A** Erection of steel envelope (cladding) on steel frame fixed onto existing concrete vent shaft, and installation of green walls on both side (Sui Generis). **Refused 10/04/2019 and Dismissed at Appeal under refs. APP/X5210/H/19/3227881 and APP/X5210/H/19/3227883**

### Reasons for refusal:

1. The proposed LED digital advertising screen, by virtue of its size, scale, design, location and method of illumination, would be an incongruous and bulky feature that would introduce an illuminated fixture as well as create visual clutter at high level. This element of the proposal is considered to be an unsympathetic and unacceptable form of development that would be

detrimental to the character and appearance of the streetscape and surrounding locale, contrary to policy D4 (Advertisements) of the Camden Local Plan 2017.

**Both of the above applications were dismissed at appeal 09/10/2019, they were considered together under refs. APP/X5210/H/19/3227881 and APP/X5210/H/19/3227883**

Summary of the reasons for dismissal of the above two appeals, See Appendix A for full report.

1. Under para 10 of the report the Inspector made the following comments In terms of size, the proposed structure would be significantly taller and wider than the existing vent shaft. The intervening area, with pleasant landscaping and well considered footways brings an area of much needed relief to this busy city centre location. A structure of such a size would tower above this space and would visually dominate the otherwise uncluttered public realm in this location. Furthermore, the overwhelming scale of the structure would be exacerbated by the internally illuminated LED advertisement on its most visually prominent elevation, facing towards the open vista of Euston Circus. Such an arrangement would introduce visual clutter at a high level within the streetscene. A structure of this size would visually dominate the footway. This would be in marked contrast to the more subdued background character of the immediate locality, with its pleasant areas of seating under the trees and the existing vent shaft assimilating itself well into the background.
2. Under Para 14 of the report the Inspector made the following comments, the proposed structure represents an increase in width of built development when compared to the existing vent shaft. This arrangement would result in the proposed structure extending further across the footways that run past either side, which provide access to and from Euston Circus for pedestrians and cyclists. The northernmost footway is already constrained, as it is contained by the safety barriers that run parallel to the Euston Underpass. The narrowing of the footway in this location would clearly make it more difficult for pedestrians and cyclists to pass along, making it more crowded than at present. Such conditions would in turn make it more difficult for the visually impaired to negotiate than at present.

## **Adjacent Sites**

### **History: Euston Road Kings Cross Square**

**2018/2165/A** Display of two internally illuminated digital media screens (4m high x 27m wide and 6.5m high x 60m wide) on circular and oval ventilation shafts respectively **Refused 10/07/2018**

#### Reasons for Refusal:

The proposed 2 display screens, by reason of their size, locations, design and method of illumination, would be detrimental to the appearance of the host structures and Kings Cross Square, the character and appearance of the Kings Cross Conservation Area and the setting of the adjacent listed buildings (Great Northern Hotel, Kings Cross Station and St Pancras station), contrary to policies D1 (design), D2 (heritage) and D4 (advertisements) of the London Borough of Camden Local Plan 2017.

**Dismissed on appeal ref. APP/X5210/A/18/3208882 on 13/12/2018**

#### Reasons for Dismissal:

The proposed LED digital advertisements would wrap around the upper part of the large oval structure and cover the upper northern semi-circular part of the smaller round structure. Given they would obscure the characteristic fins, they would be detrimental to the design and appearance of the host structures. The proposed advertisements would have an

unacceptably harmful effect on the visual amenity of the area. They would fail to preserve or enhance the character or appearance of the CA. They would also be detrimental to the setting of the nearby listed buildings.

### **University College Hospital, No235**

**2013/6400/A** Display of digital screen to front elevation of hospital. **Refused on 22/10/2013**

#### Reasons for Refusal:

The proposed advertising screen, by virtue of its size, position, prominent location and method of illumination, would harm the character and appearance of the host building and wider street scene contrary to policy CS14 (Promoting High Quality Places and Conserving Our Heritage) of London Borough of Camden Local Development Framework Core Strategy and Policy DP24 (Securing high quality design) and of London Borough of Camden Local Development Framework Development Policies.

**Dismissed on appeal ref. APP/X5210/H/13/2208080 on 31/12/2013**

#### Reasons for Dismissal:

In this context, the addition of a large, illuminated advertising screen would appear out of character. The building on which the proposed advertisement would be located is one such example, and despite the appellant's assertion that the sign would respect the architectural integrity of the building, it would result in additional attention being drawn away from the street scene towards the building. This would lead to the screen appearing unduly dominant within the context of its surroundings. Whilst I consider that the proposal does not have a severe impact on the appearance of the building itself, these considerations do not outweigh my strong concerns regarding the harmful visual impact of the proposal on the surrounding area.

**2012/4564/A** Display of digital screen and lettering to front elevation of hospital. **Refused on 18/10/2012**

#### Reasons for Refusal:

The proposed LED advertising screen, by virtue of its size, prominent street corner location, and awkward relationship to the design of the elevation of the host building, would appear unduly dominant, and therefore harmful to the character and appearance of the host building and street scene. The proposal is therefore contrary to Policy CS5 (Managing the impact of growth and development) of London Borough of Camden Local Development Framework Core Strategy and Policy DP24 (Securing high quality design) of London Borough of Camden Local Development Framework Development Policies.

**Dismissed on appeal ref. APP/X5210/H/12/ 2189379 dated 11/07/2013**

#### Reasons for Dismissal:

The media screen would be fixed to the curved corner of the building overlooking the major road junction formed by Euston Road and Tottenham Court Road. At 6m high and 12m in width, and located on this highly prominent corner of the building, the screen would, notwithstanding the size of the building, have a substantial impact on its appearance and the way it relates to its surroundings. For such a central, urban area, the upper levels of buildings are remarkably free of advertising. This helps to give the area a clean, high quality

appearance. This aspect of the character of the area would be significantly compromised by the appeal proposal. The bottom of the screen would be about 9.4 m above the ground, well above the great majority of advertising material nearby, including the large screens at the entrances to the underpass. As such, and given the current lack of advertising clutter at upper levels in this locality, it would appear incongruous and excessively prominent and would dominate this important corner of the building. As a result it would have a marked, harmful effect on the character and appearance of the area and be an intrusive and harmful feature.

### **Euston Underpass**

**2014/4500/P** Variation of condition 2 of planning permission issued on 01/07/2011 (Camden ref: 2010/6615/P) for 'Alterations to existing guardrails in connection with the erection of two projecting advertisement units to either side of the Euston underpass'; namely to amend the time limit on retention of the advertising panels. **Granted on 18/09/2014**

**2014/4499/A** Display of two internally illuminated signs (LED screens) to sides of the Euston underpass. **Granted on 18/09/2014**

**2010/6615/P** Alterations to existing guardrails in connection with the erection of two projecting advertisement units to either side of the Euston underpass. **Granted on 01/07/2011**

**2010/6613/A** Display of two illuminated advertisement signs (LED screens) to sides of the Euston underpass. **Granted on 01/07/2011**

### **Relevant policies**

#### **The National Planning Policy Framework 2019**

#### **Publication London Plan December 2020**

#### **TfL's Pedestrian Comfort Guidance for London 2010**

#### **Camden Streetscape Design Manual**

#### **Digital Roadside Advertising and Proposed Best Practice (commissioned by Transport for London) March 2013**

#### **Camden Local Plan (July 2017)**

- A1 Managing the impact of development
- D1 Design
- D4 Advertisements
- T1 Prioritising walking, cycling and public transport
- G1 Delivery and location of growth

#### **Supplementary Guidance - Camden Planning Guidance**

- CPG Design (March 2019) – chapters 2 (Design Excellence) and 4 (Landscape and public realm)
- CPG Transport (March 2019)

- CPG Advertisements (March 2018) (para 1.1 to 1.18)
- CPG Amenity (March 2018) section 4 (Artificial light)

## **Euston Area Plan (January 2015)**

## **Town and Country Planning (Control of Advertisements) (England) Regulations 2007**

### **Assessment**

#### **1. Proposal and Background**

- 1.1 Planning permission is sought for the erection of an outer steel cladding to steel frame affixed onto the existing concrete of a ventilation shaft. Advertisement Consent is sought for the display of an internally illuminated LED digital advertising board on the ventilation shaft's west elevation, facing onto Euston Circus junction.
- 1.2 The existing timber cladding/fencing currently in place would be removed to accommodate the steel frame and cladding. The metal frame would allow for the steel envelope to be mounted without altering the shaft structure.
- 1.3 The envelope would have a maximum height of 8.8m. The base would be 3.3m in width and curve outwards from ground level until it reaches 2.3m in height. The widest part of the envelope would be 4.3m on the western elevation and its maximum depth would be 8.1m. The rear of the envelope (north-east facing) would consist of a curved louvered grill to replicate the existing ventilation grill on the concrete shaft, thus enabling air to escape. The south-west facing elevation would have a LED screen display installed approximately 2.5m from ground level and measuring approximately 6.2m in height by 4.3m with a total area of 27sqm.
- 1.4 The proposal has a similar design as two applications recently dismissed at appeal on 09/10/2019 (refs 2019/0754/P & 2019/0131/A considered together under refs. APP/X5210/H/19/3227881 and APP/X5210/H/19/3227883). However, the frame is now closer to the existing vent shaft and as a result the height, width and depth of the steel envelope has been reduced. The previously refused proposal had a maximum height of 10.5m, width of 5.5m at its base (maximum width of 6.1m) and depth of 9.3m. The LED screen for the previous proposal measured 7.9m by 4.9m, with a total area of 39sqm. Images of the proposals are shown below in Figures 1-2.

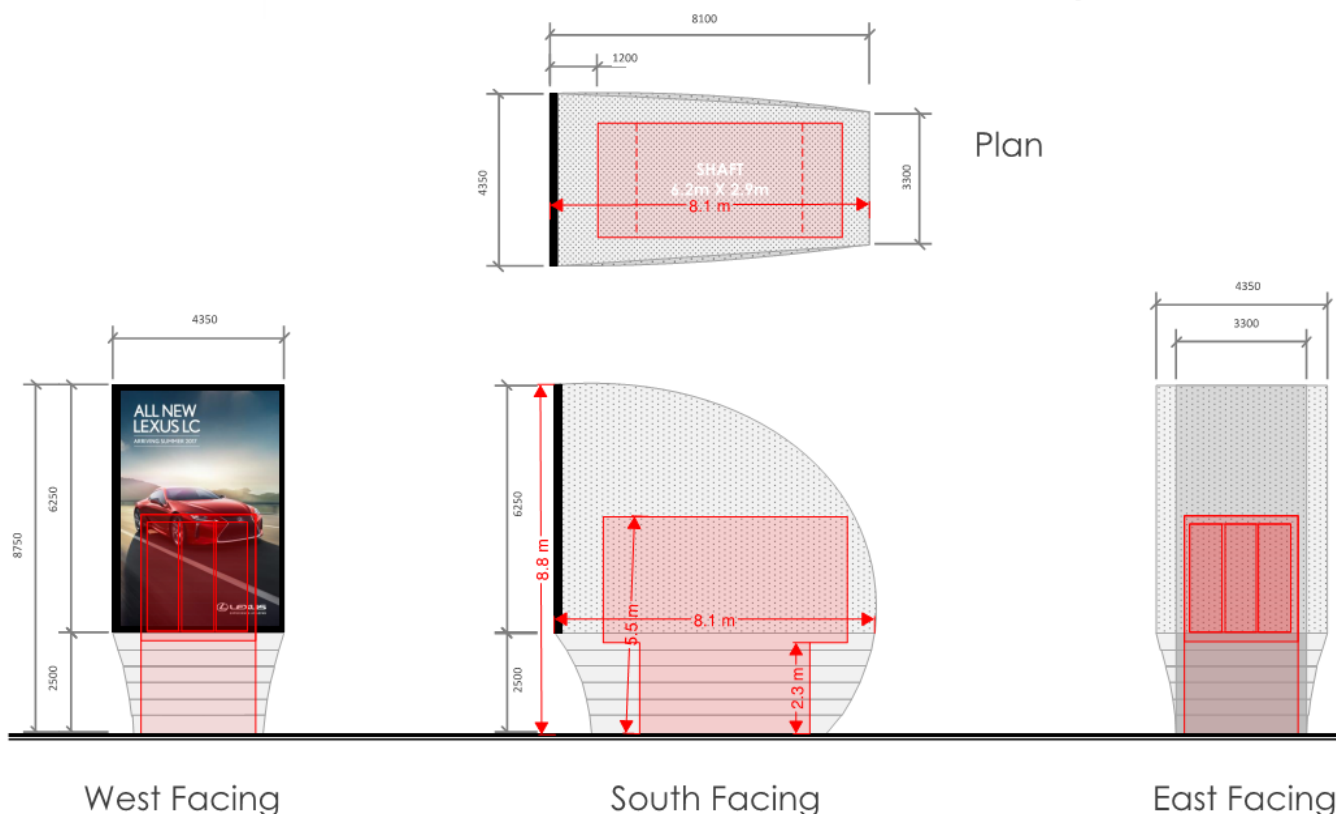


Figure 1: Current proposal – red denotes the existing vent shaft

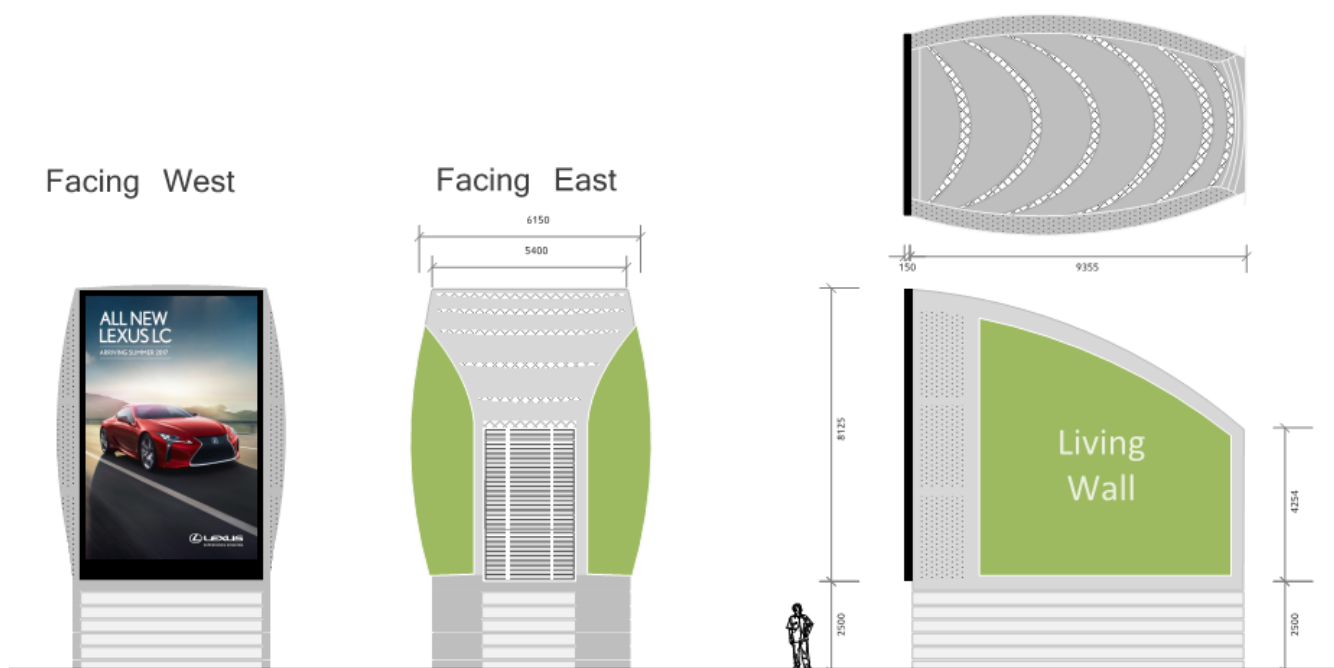


Figure 2: 2019 proposal dismissed at appeal

1.5 The Town and Country Planning (Control of Advertisements) Regulations 2007 (as amended) permits the Council to only consider amenity and public safety matters in determining advertisement consent applications.



## **2. Assessment**

2.1. *The principal considerations in the determination of both applications are:*

- *Design*
- *Amenity*
- *Siting*
- *Public Safety*

## **3. Design**

### Policy and guidance

- 3.1. *Policy D1 (Design) of the Camden Local Plan 2017 states that ‘The Council will seek to secure high quality design in development. The Council will require that development that respects local context and character; is of sustainable and durable construction and adaptable to different activities; comprises details and materials that are of high quality and complement the local character; integrates well with the surrounding streets and open spaces, and contributes positively to the street frontage; incorporates high quality landscape design and preserves strategic and local views.’*
- 3.2. *CPG Design states that ‘High quality design makes a significant contribution to the success of a development and the community in which it is located. The Council requires development schemes to improve the quality of buildings, landscaping and public spaces and we will not approve design which is inappropriate to its context or fails to improve the character of an area.’*
- 3.3. *The guidance further states that ‘materials should form an integral part of the design process and should relate to the character and appearance of the area. The durability of materials and understanding of how they will weather should be taken into consideration. The quality of a well-designed building can be easily reduced by the use of poor quality or an unsympathetic palette of materials.’*

### Assessment

- 3.4. The existing vent shaft comprises a ‘T’ shaped concrete base topped with a larger timber cladding crown. The existing vent shaft has a maximum height of 7.9m and width of 3.1m at the crown. The base of the shaft measures 4.3m by 2.9m, providing a footprint of approximately 12.5 sqm. The existing shaft, due to the overhanging design of the upper part of the shaft, would cover an area of approximately 18.2sqm. Currently, the concrete shaft sits approximately 3m away from the underpass wall to the north of the site. In dismissing the 2019 appeal, under para 8 of the decision the Inspector described the vent shaft and its contribution to the surrounding context:

*‘Whilst it is in clear view from Euston Circus, it is not unduly prominent, as its weathered concrete and timber-cladding blends into the backdrop of trees that lie behind in the central landscaped section. Whilst somewhat dated in appearance, it is a nonetheless a*

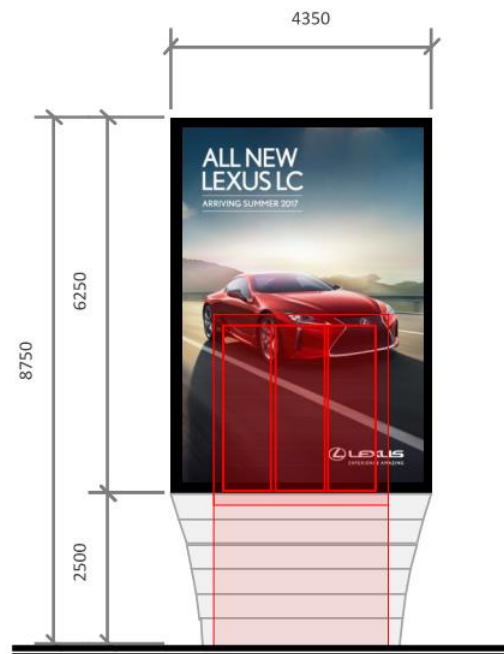
*necessary functional piece of architecture, which was constructed to provide ventilation to the London Underground. An existing advertisement display board is attached to the existing vent shaft which faces towards the busy Euston Underpass. As a result of its positioning, this advertisement is not visually prominent within the streetscene'. (See Appendix A for full report)*

- 3.5. The vent shaft occupies land between two footpaths that run either side of a central landscaped area with tree planting, interspersed with a number of benches and cycle stands. The area is typically well used with a steady flow of pedestrians and cyclists using the footway. The existing ventilation shaft is a functional and unobtrusive piece of architecture. It is accepted that the structure does have a rather utilitarian appearance; however, its presence is justified by its utility in providing ventilation to the tube lines serving Euston Square Underground Station below. As noted by the Inspector in the 2019 appeal, the surrounding high rise buildings, heavy trafficked junction and main roads to some extent absorb its presence within the urban landscape. The adjacent trees also provide some level of screening as well as softening the background. The existing ventilation shaft is considered to provide a neutral contribution to the character and appearance of immediate area.



*Figure 3: Views of existing shaft which integrates into surrounding context*

- 3.6. Whilst the scale of the proposed structure has been reduced following the recent dismissed appeal decisions, the structure would still tower over the pavement and dominate the streetscape when compared to the existing ventilation shaft. The structure would be particularly prominent to the west, where the two footways come together, to form a larger paved plaza at end of the section of footway. This is where Gower Street meets with a number of other roads, to form the busy Euston Circus. This area has a particularly open aspect and is relatively free of street clutter. From this location, as a result of the open aspect, views of the vent shaft are at their most prominent. The proposed steel envelope would stand out in these views and appear obtrusive within the streetscape. The reduction in scale from the previous proposal would not significantly alter how the structure would be experienced at ground level.



## West Facing

*Figure 4: Proposed West elevation shows considerable increase in scale on the existing shaft – red denotes the existing vent shaft*

- 3.7. The structure would not be of a human scale. It would diminish and encroach upon the open and clutter-free character of this section of public realm. The shiny steel and alloy materials would be in marked contrast to the more calm background leafy character of the immediate locality. The structure's modern lines, combined with the steel material, would create an incongruous and overriding structure that would appear jarring when set against the leafy and open background. The structure would no longer reflect its primary use which is to provide ventilation to the underground. The new structure would act as a metallic focal point within long views from the north-eastern and south-western ends of Euston Road, also detracting from the clean lines of buildings bordering both sides of Euston Road.

## 4. Amenity (visual amenity, residential amenity)

### LED digital display screen

### Policy and guidance

- 4.1. 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. 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 or impact upon public safety.'*
- 4.2. CPG (Advertisements) states *'Advertisement hoardings or posters will not usually be acceptable in predominantly residential areas. Digital advertisements are by design visually prominent and attention grabbing with their illuminated images, especially when they are large*

*in size. They are not suitable for locating in some areas. Factors which make a location less suitable for digital billboards include location where the advertisement could become the most prominent feature of the street scene. Advertisement hoardings or posters will not usually be acceptable in predominantly residential areas.’ The guidance further states that ‘The Council will resist illumination of hoardings where it is a nuisance or out of character with the area.’*

- 4.3. Referring to best practice guidance, CPG (Advertisements) also states that *‘Proposals for digital advertisements should adhere to the best practice guidance set out in the Transport for London Guidance for Digital Roadside Advertising and Proposed Best Practice (March 2003). This best practice guidance sets out detailed considerations and requirements including:*
- Siting of adverts including proximity to traffic signals, hazards, and longitudinal spacing;*
  - Position and orientation to the carriageway;*
  - Message duration, transitions, and sequencing; and*
  - Lighting levels.’*
- 4.4. CPG Amenity refers to the impact of artificial light as *‘Excessive or poorly designed lighting can cause light spillage and glare and be damaging to the environment by:*
- having a detrimental impact on the quality of life of neighboring residents;*
  - changing the character of the locality;*
  - altering wildlife and ecological patterns; and*
  - wasting energy.’*
- 4.5. The guidance further states that *‘The Council will therefore expect that the design and layout of artificial light be considered at the design stage of a scheme to prevent potential harmful effects of the development on occupiers and neighbors in terms of visual privacy, outlook and disturbance. Artificial lighting should only illuminate the intended area and not affect or affect the amenity of neighbours.’*

#### Assessment

- 4.6. An existing internally illuminated advertisement display board is in place on the northern side of the ventilation shaft, facing directly onto Euston Road and overlooking onto the Euston Underpass, and measures approximately 3.8m in width by 5.1m in height and 0.2m in depth (thickness, with frame).
- 4.7. The purpose for the installation of the steel envelope is to enable the display of a new internally illuminated LED digital display screen facing onto Euston Circus. The display screen would be installed approximately 2.5m above ground level, and measuring approximately 6.2m in height by 4.3m in width. The advertising face area would cover approximately 27sqm. The 2019 application LED display screen was also 2.5m above ground level but measured 7.9m by 4.9m. The advertising face area for the previous proposals covered approximately 38sqm.
- 4.8. The site is surrounded by tall buildings providing office and commercial usage as well as University College of London Hospital (UCLH) on the opposite side of the Euston Road slipway, approximately 30m southwards from the site. Due to the orientation of the structure and the LED screen, any light spillage would be negligible and the illuminance would not cause harm to the amenity of the nearby hospital.
- 4.9. The advertising screen would be on the most publicly visible elevation, facing towards Euston Circus. The size of the digital screen is significant at 27sqm. The reduction of approximately

11sqm from the 2019 proposal does not significantly reduce the visual impact of the LED screen that was deemed unacceptable by the Local Planning Authority and the Planning Inspectorate. Due to the open aspect of Euston Circus and the width of Euston Road, the sign would continue to be highly visible and obtrusive in both medium and longer views. The advertisement would appear as a highly prominent feature within the street scene. The impacts caused by the scale of the structure are intensified by the high level internally illuminated LED advertising screen.

- 4.10. Digital advertisements appear significantly more visually obtrusive than a back-lit display. The advertisement would provide a range of static images - changing every 10 seconds (not flashing) with an illuminance level of 300cd/m. However by its nature as an LED digital method of illumination, with a rotating display, would produce significant levels of light and glare.



Figure 5: comparative views of proposed LED screen (left) and existing vent shaft (right)

- 4.11. It is noted that digital advertising displays can be found on the overhead of the bridge over the Euston underpass. Both are large features which are in direct views from the south-westbound and north-eastbound traffic. However, both signs are at low level and benefit from shielding from the underpass walls. Their low level position makes both advertising displays less conspicuous and primarily visible to the approaching traffic entering the underpass. They are not towering fixtures at high level noticeable from afar, intruding onto the locale, as is proposed here.

## 5. Public Safety

### Policy and Guidance

- 5.1. Policy D4 (Advertisements) states that *'Advertisements will not be considered acceptable where they impact upon public safety, including when they:*
- *obstruct or impair sight lines to road users at junctions and corners;*
  - *reduce the effectiveness of a traffic sign or signal;*
  - *result in glare and dazzle or distract road users;*
  - *distract road users because of their unusual nature;*
  - *disrupt the free flow of pedestrian movement; or*
  - *endanger pedestrians forcing them to step on to the road.'*



- 5.2. The proposed digital display would continue to display static, poster-like images only. Each poster would be displayed for at least 10 seconds, in a similar way to traditional scrolling vinyl poster displays. There would be no video or animation used.
- 5.3. The application has been prepared in accordance with a document commissioned by Transport for London titled 'Guidance for Digital Roadside Advertising and Proposed Best Practice'. Given the non-scrolling/animated nature of the sign and illumination, the illumination level and method would be considered acceptable from a public safety perspective. The previous proposal produced a Road Safety Audit, which concluded that the proposal would not have detrimental impact to road safety. The advertisement now proposed has been reduced in size and therefore the previous findings of the report are still considered valid. Officers consider that the proposal would not present significant public safety concerns. On this point, the proposal is considered to be acceptable

## 6. Siting

### Policy and guidance

- 6.1. Policy T1 (Prioritising walking, cycling and public transport) states that 'In order to promote walking in the borough and improve the pedestrian environment, we will seek to ensure that developments improve the pedestrian environment, are easy and safe to walk through ('permeable'), provide high quality footpaths and pavements that are wide enough for the number of people expected to use them. Features should also be included to assist vulnerable road users where appropriate.'
- 6.2. The policy further states that 'In order to promote cycling in the borough and ensure a safe and accessible environment for cyclists, the Council will seek to ensure that development is easy and safe to cycle through ('permeable').'
- 6.3. Camden's Streetscape Design manual – section 3.01 footway width states: "Clear footway" is not the distance from kerb to boundary wall, but the unobstructed pathway width within the footway:
- 1.8 metres – minimum width needed for two adults passing;
  - 3 metres – minimum width for busy pedestrian street though greater widths are usually required; Keeping the footway width visually free of street furniture is also important, allowing clear sightlines along the street'
- 6.4. All development affecting footways in Camden is expected to comply with Appendix B of Transport for London's (TfL's) Pedestrian Comfort Guidance, which notes that active and high flow locations must provide a minimum 2.2m and 3.3m of 'clear footway width' (respectively) for the safe and comfortable movement of pedestrians.

### Assessment

- 6.5. As stated above two sections of footway run either side of the shaft which serve both cyclists

and pedestrians. Adjacent to the south-easterly paved lane is a gravel covered area providing planting for some large London Plane trees. There is approximately 1.5m between the concrete shaft and the paved lane. The new installation would increase the width of built development when compared to the existing vent shaft. The structure would encroach into the 1.5m gap by approximately 700mm but retain an 800mm gap between the paved lane. The 1.9m paved passage would remain available for the use by pedestrians and cyclists.

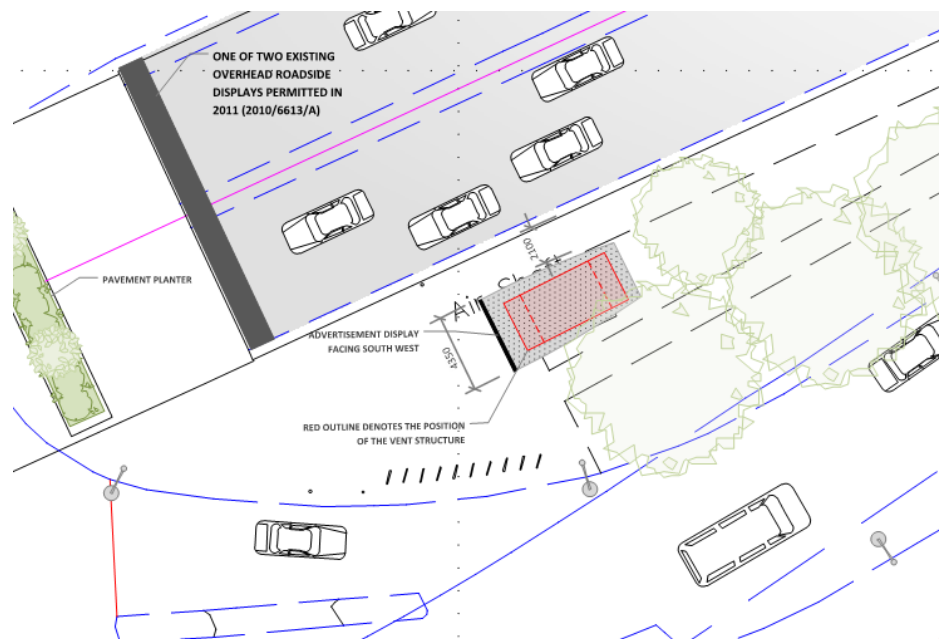


Figure 5: Block plan

- 6.6. In terms of accessibility, there would still be sufficient space retained on the southern part of the development. To the north the distance between the proposed structure and the underpass wall would be reduced to a gap of approximately 2.1m (the previous proposal retained a 1.3m gap). The 2.1m northern pavement section between the new structure and the underpass wall would fall short of TfL's Pedestrian Comfort Guidance, minimum of 2.2m and 3.3m of 'clear footway width' for active and high flow locations. Whilst the revised proposal would reduce the impact to pedestrians and cyclists passing along this route, it would still make it more crowded than at present. This passage is already constrained and well used by pedestrians and cyclists. It is considered that the increase in built development would have a detrimental impact on the free flow of pedestrians and cyclists in this location. This reduction in space is also likely to further impede visually impaired pedestrians who would have difficulty navigating around the installation.

## 7. Recommendation

- 7.1. Refuse Planning Permission
- 7.2. Refuse Advertisement Consent

**Appendix A – Appeal Decision dated 09/10/2019 (refs.  
APP/X5210/H/19/3227881 and APP/X5210/H/19/3227883)**



