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Date: 1 July 2021

Our ref: UCLH/CAM001a
Planning ref: 2021/0199/A

Dear Tony

University College London Hospital: Application for Advertising Consent to Display an Advertising Screen as a Component of a Scheme including the installation of Air Purifiers

On behalf of our client, University College London Hospital, we are pleased to enclose an application for advertisement consent to display an advertising screen at University College London Hospital, 235 Euston Road, London NW1 2BU as part of a scheme to include the installation of 5 air purification units. The planning reference for the air purification application which forms part of this scheme, with both applications contingent on each other, is 2021/2890/P.

Application Submission

This application has been submitted via the Planning Portal (ref. PP-09421589) and comprises:

1. Application Form
2. Location Plan at 1:1250 scale
3. Existing Elevations, drawings ref: 1N and 1W
4. Proposed Elevations, drawings ref: 2N and 2W
5. Existing UCLH Feature Screen Unfolded, drawing ref: Feature Screen Unfolded Elevation
6. Proposed UCLH Feature Screen Unfolded showing air purifier positions, drawing ref: Feature Screen Unfolded Elevation Marked
7. Visualisation Drawing indicating the designated display area
8. Transparent LED Information Document
9. Image of Transparent LED Technology in Use (set at 100% brightness)
10. Image of Rear View of Transparent LED in Use (set at 100% brightness)
11. Transparent LED Specification Document

12. Highway Safety Statement Ref: ITR-5522-HS.2

13. Llewelyn-Davies Architects Original Proposal Document

The planning application fee of £462 has been paid directly to the Planning Portal.

Site and Surrounding Area

The proposed display screen and air purifiers will be located at the corner of Euston Rd and Tottenham Court Rd where there is currently an outer glazed skin fitted to the main building structure. Our scheme will replace the outer glazing skin with a transparent digital LED display, and install 5 air purification units as detailed in application ref 2021/2890/P.

The present University College London Hospital (UCLH) building was opened in October 2005 and the display element is in line with the architect's original design vision for the building as a landmark statement. We expand on this in the design section below.

Proposed Signage

We are applying to replace the existing glazed skin with a transparent LED signage screen on the north west corner of the building. This will be attached to the building structure in a similar fashion to the current glazed skin. The transparent screen will measure 13.84m (high) by 15.35m (wide) as a seamless replacement for the existing glazed skin. Whilst it will be necessary to replace the entire glazed skin to effect a seamless architectural treatment we propose to limit the display area utilised to a centrally positioned 12m (height) x 8m (width) designated area to address visual amenity concerns.

The proposed screen will display multiple static messages comprising UCLH public health, Camden Council messaging and commercial ads on rotation. Public service messaging will account for a minimum of a sixth of the display time.

The use of transparent LED display technology, which has 70% transparency, allows natural daylight to pass through into the internal areas of building whilst retaining the privacy offered by the current 'outer skin.'

This transparent LED display has a much 'lighter touch' than solid LED displays and so replicates the architectural effect of the current glazing feature. We have provided an image of our use of this technology, in partnership with British Land plc, where the brightness is set to 100%. Our proposed display protocols at UCLH would result in the display operating at between 10-50% brightness.

In addition we have provided an image of the view from behind the transparent LED whilst it is operating and set at 100% brightness.

Technical specifications, images of the technology, the elevations and a visual of the screen in situ can be found in the accompanying material. We expand upon how we propose to utilise the technology with measured protocols in consideration of public safety and amenity later in this document.

The National Planning Policy Framework 2019 (NPPF) sets out the government's planning policies for England and how these are expected to be applied. In accordance with Paragraph 132 of the National Planning Policy Framework (NPPF) advertisements should be subject to control only in the interests of amenity and public safety, taking into account cumulative impacts. As described in the National Planning Practice Guidance (NPPG) the regime is a “lighter touch” than the system for obtaining planning permission for development. The NPPG also clarifies that a local plan does not have to contain advertisement policies and that if such policies are considered necessary to protect the unique character of a particular area, these should be evidence-based.

The Development Plan for the area comprises the Camden Local Plan 2017. Policy D4 of the Local Plan related to advertisements states:

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 and be of the highest standard of design, material and detail. We will support advertisements that:

- preserve the character and amenity of the area; and
- preserve or enhance heritage assets and conservation areas.

We will resist advertisements that:

c. 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;
- have flashing illuminated elements; or
- impact upon public safety.

Planning Considerations

The impact of the proposed display has been considered in amenity, public safety and design terms as follows:

Amenity

As the proposed screen will be located in a predominately commercial area with a variety of established digital and other advertisements as well as shop signage etc it is not anticipated that there will be any adverse impact on amenity.

The proposed screen will display multiple static messages on rotation.

The intervals between successive displays will be instantaneous with no special visual effects, no fading, swiping or other animated transition methods. There will be no animated,

flashing, scrolling, intermittent or video elements. The minimum display time will be 10 seconds and a dimmer control and photo cell will constantly monitor ambient light conditions and adjust sign brightness and illumination appropriately.

Under direct sunlight the display will be operated between 2500 & 3500 Nits/sqm (half of the potential brightness). During the night the brightness will drop to 10% of the daytime screen levels (between 200 and 350 Nits/sqm).

The proposed screen will be internally illuminated. The controls proposed over the level of luminance will continue to ensure that this does not cause harm to amenity. The context of the surroundings, including other illuminated adverts/illuminated shop signage/street lighting establishes the site as appropriate for an illuminated display of this type. Additional controls over the display will be considered if necessary to remedy a specific amenity concern.

Public Safety

The display is located at a junction where road traffic and pedestrians are well managed by traffic lights and traffic light controlled pedestrian crossings with clear markings and a prevailing 20mph speed limit.

The previously detailed illuminance protocols will minimise the impact of the illumination on drivers and their prominence to pedestrians.

Given the level of management at the junction we believe our proposed display will not cause distraction or confusion to any road users and will not endanger people in the vicinity who are taking reasonable care for their own and others safety.

We provide a highway safety report from Bellamy Roberts, Highway and Transportation Consultants which evaluates the impact of our proposals on road users and concludes that there are no highway concerns raised.

It should be noted that Bellamy Roberts reached this conclusion based on the entire screen being used rather than the less impactful smaller designated display area we propose in this application.

Design

The UCLH building is designed in a modern style and sits amongst predominately similar modern styled buildings. The building is not listed and is outside of the Bloomsbury Conservation Area.

The screen proposed is to be located on the north west corner of the building, which is currently already a design feature of the building. It is considered that the screen will further increase this corner's prominence as a design feature to identify the hospital as a landmark. The design is in keeping with the modern architecture of the hospital and the area as a whole. The architect's original intention for this corner of the building included a large scale decorative lighting feature as a landmark statement and this proposal is an evolution of that vision using newly available technology. We have attached Llewelyn-Davies Architects proposal document in this regard. This aspect of the building's development was not able to be pursued due to cost concerns at the time but, as demonstrated in the

architect's proposal, it is entirely congruous with the design of the site. The use of transparent LED display technology recreates the current glazed 'outer skin' and the display will be constructed of materials matching the RAL colour of the existing structure. This will ensure that the display will be integrated within the site rather than look 'stuck on' and as such will not cause visual clutter in the context of the elevations as a whole.

Air Purification

This scheme is not solely a pure advertising application; of equal importance is the air purification technology that we will deploy.

An integrated component of the scheme is proven air cleaning technology that eliminates up to 75% of the most deadly airborne particulate matter from an active air flow in a single cycle. We will deploy 5 'ENS Halfero' units which will deliver radical airborne particulate matter reduction within 50m radius of the site, and beyond.

This technology has been vetted and approved by TfL and their deployment is being rolled out in the Paris Metro system.

The advertising revenues from the screen will fund the acquisition, ongoing operation and maintenance of the air purification units. We will demonstrate our commitment to this aspect of the scheme by providing details of our maintenance provisions for the units as we progress.

This is the first location for a pioneering business model which we intend to expand elsewhere to deliver major public health benefits.

To measure effectiveness and monitor performance we will also install and share data from real time air quality measurement technology.

Information about the air cleaning technology and air monitoring can be found in the connected application, ref 2021/2890/P.

UCLH is located on one of the most polluted roads in Europe. Air pollution has been labelled a global public health emergency by the World Health Organisation and London's PM2.5 average levels exceed EC air quality standards by a factor of THREE.

Camden is tackling the issue with its Clean Air Action Plan 2019-2022. This includes the following actions which are relevant to this application:

- Using planning policy and regulation to reduce air pollution
- Implementing innovative projects across the Borough to improve air quality
- Maintaining a monitoring network and ensuring the data is freely accessible
- Raising awareness on how to reduce emissions and exposure
- "We will use all the resources at our disposal to play our part in improving air quality, one of London's biggest challenges"

As part of our development of this scheme we have been in discussion with Camden's Senior Air Quality Officer, Tom Parkes and Councillor Adam Harrison, Cabinet Member for Sustainable Camden, about the project and the technologies we are proposing and they have committed their support.

"We are certainly interested to see how this proposed installation performs in real-world conditions, especially in such a busy environment with numerous significant emissions sources. We encourage the project and support it in principle."

Tom Parkes – Senior Air Quality Officer

There have been a great many authoritative studies and much written about the harm caused by air pollution with demonstrable links to deaths, COVID mortality, adverse impacts to health etc. We were tempted to cite examples to highlight the importance of the health benefits of this scheme, but given the prominence of the subject we feel confident that the severity of issue is well understood. Nevertheless we are happy to provide specific evidence if requested.

Funding for Primary Care Trust

A proportion of the display time will be devoted to commercial ads which will fund the entire project and the ongoing air purification operations. In addition the NHS will receive a significant revenue from their share of advertising income to help with the parlous state of their funding.

The scheme will provide significant public service messaging, significant revenues and have a hugely beneficial impact on air quality, with the associated wellbeing.

"The Trust is very much in support of this installation which we hope will bring not only much needed revenue for the NHS but also provide a particle catching device to contribute to the Clean Air Action Plan in and around Camden."

Baroness Julia Neuberger - Chair UCLH

Community/Health Messaging

A minimum of one sixth of all display time will be dedicated for public/community messaging from the NHS and Camden Council.

Furthermore given the air cleaning characteristics of the site it is anticipated that much of the commercial content displayed will promote clean air and desirable environmental behaviours as brands' will seek to publicise their clean air initiatives, corporate social responsibility initiatives and relevant product virtues (obvious examples are electric vehicle ads or brands using EVs in their fleets and so on).

Site Planning History

There have been two previous unsuccessful applications made to display advertising at this location. Both of these applications were conceived very differently from our application, using different display technology with less concern for the host building and surroundings,

and these applications were purely commercial ventures without any community messaging or wellbeing benefits other than revenues to the NHS trust.

The previous applications did not have an air purification component and predated Camden's Clean Air Action Plan 2019-2022, which has a material impact on how our proposal should be viewed in planning terms.

In addition the previous applications were made some time ago, since when digital advertising has become more acceptable and installations now commonplace, with the prevalence of digital bus shelter and street furniture advertisements at street level as well as many larger format digital billboard advertisements in close proximity to UCLH.

Furthermore technological advances, not least GEM's patented transparent technology, enables more elegant, integrated, harmonious display solutions to be realised.

Pre-Planning Consultation

We engaged in pre-planning consultations with Ben Farrant in February 2020 which unfortunately were affected by COVID lockdown restrictions. Whilst we were able to have a telephone discussion with Ben we felt that the pre-planning process was very much prejudiced by the inability to meet physically and work through the proposals together. When we have been involved in these discussions on other projects we have almost always been able to work together to find solutions. Whilst we felt Ben was sympathetic to much of what we are trying to achieve the lack of opportunity to have a dialogue with his design and transport colleagues was regrettable.

Our initial pre-application discussions continued until May 2020 and then after a hiatus resumed in December 2020 but regrettably COVID restrictions continued to prevent normal communication and we were unable to arrange an online virtual meeting.

We understood the concerns raised in pre-planning which led to us modify our application to reduce the display size and to commission a highway safety report as suggested.

It was our opinion that in addition to disruption to communication the previous failed applications, made by another business and completely different in both conception and execution, were being referenced unfairly when judging our proposal. Also we felt that the stated policy contained within Camden's Clean Air Action Plan 2019-2022 and how the policy applies to this application were not considered with enough weight in pre-application advice.

Conclusions

As set out in this application it is not considered that the proposed signage will cause additional harm in terms of amenity or public safety. It has also been demonstrated that the proposal is acceptable in design terms given the architect's vision for the site and as it is in accordance with the requirements of Local Plan Policy D4.

The air purification function fulfils Camden's Clean Air Action Plan criteria and will assist in meeting currently delinquent clean air obligations.

This scheme delivers benefits to public health in respect to tackling air pollution, to the NHS by providing much needed significant additional funding from their estate, and for the community through messaging on the display.

If required we are happy to collaborate with Camden on the scheme where appropriate and we see this as an opportunity for Camden to set an example by supporting a ground breaking commercial project that benefits the public in many ways.

This is a carefully considered and balanced proposal which will deliver a pioneering scheme and bring many benefits to the public, funded by advertising revenue.

Should you have any queries in relation to any of the attached information please do not hesitate to contact me.

Yours faithfully,

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