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London Borough of Camden
Planning-Development Control
Camden Town Hall
London WC1H 8ND

23rd February 2022

Dear Sir/Madam

**Re: Planning Application Underground Entrance O/S 17-23 Euston Road London
NW1 2RY
Application for Two Glass fronted LCD Digital Advertisement Displays.**

Attached is a Planning Application made on behalf of London Lites Ltd for two small Glass Fronted LCD Digital Advertisement Displays located on the London Underground Entrance to Kings Cross on the north side of Euston Road.

The application site are two shelters covering the entrances to the London Underground and it is proposed to locate the advertisements on the ends of these shelters. The shelters are owned by Transport for London. The surroundings are predominantly commercial in character and the displays are located outside McDonalds, the Post Office and a Bar Restaurant. Euston Road at this point is dominated by the road network but is also a busy shopping area with a variety of large and small retail units.

With reference to the attached drawings, the current proposal is to erect two displays measuring 1.8 metres wide by 2.7 metres high. One display will face eastbound traffic and the other westbound traffic on Euston Road.

The LCD displays will show one or more sequential static images.

The environmental advantages of this new energy efficient digital display over traditional advertisements is that there is no longer a need to print and dispose of PVC or paper posters. There is a subsequent reduction of vehicle miles and CO2 emissions as there will not be a need to physically change and maintain the traditional posters. These LCD displays will be remotely operated; saving fuel, reducing traffic and material consumption.

It is proposed that the luminance of the advertisements will be limited to a maximum of 300cd/m² during the hours of darkness and 600cd/m² during the day. The advertisement screens are controlled by light sensors that vary the brightness of the displays according to the ambient light conditions.

The screens will operate at an illumination level in accordance with the guidance prescribed by the Institute of Lighting Professionals PLG05. Technical Note 5 of these guidelines recommend a maximum luminance of 300 cd/m² during hours of darkness (dusk until dawn).

This level of luminance is a standard level for digital displays and the applicants would accept conditions imposed by the Council relating to the luminance of the advertisements or a condition requiring the displays to be switched off between midnight and 6am.

Planning Policies and Grounds for Approval

The National Planning Policy Framework (July 2021) states in Para 136 that 'Advertisements should be subject to control only in the interests of amenity and public safety taking account of cumulative impacts'.

We outline below our submission that the proposal is considered acceptable in the interests of amenity and public safety. Euston Road does not have an excessive amount of advertising material and these advertisements are standalone features and will not add to any existing or cumulative advertising clutter.

National Planning Policies and in particular Planning Practice Guidance Paragraph 079 (updated March 2014) states that an advertisement 'would be permitted in an industrial or commercial area of a major city (where there are large buildings and main highways) where the advertisement would not adversely affect the visual amenity of the neighbourhood of the site.'

We believe this proposal, in this neighbourhood, adheres to these amenity criteria as the A501 Euston Road is a commercial, well-lit arterial road, the area has large buildings of a substantial scale. It is suggested that this is the type of busy arterial road where well placed advertisements may be acceptable in the interests of amenity.

Planning Practice Guidance (Revised 06 03 14) Paragraph 067 states that 'There are less likely to be road safety problems if the advertisement is on a site within a commercial or industrial locality'. We believe this site on a major road corridor in a commercial locality, conforms to these criteria and it is submitted that the advertisements do not present a highway safety issue.

The proposed advertisements do not obscure or conflict with any other road signs or signals and the long range of visibility gives drivers ample time to assimilate the advertisement material within their normal field of vision. This type of digital advertising display is a common feature in Central London especially on Bus Shelters and street furniture and it is believed that it does not present road safety hazard.

With regard to both amenity and highway safety the images displayed on the proposed advertisements will be static, with no animated, moving or video elements. The advertisements and images on the displays will not change more than once every ten seconds and any changes of the image will take place over a maximum period of one second. The LCD panels have a safety feature that will turn off the screen, to black, if the display has an error or malfunction.

This proposal for LCD digital displays with reduced night time luminance, is slim and energy efficient. The LCD digital displays will be remotely operated, minimising vehicle movements, traffic, fuel consumption and carbon emissions. They comply with national policies and represent a substantial investment in a high quality displays.

This type of Advertisement Display is a common feature throughout London on bus shelters and other street furniture and we hope that the London Borough of Camden will support this proposal. Should you have any queries regarding the above or attached information please do not hesitate to contact me.

Yours faithfully

Tony Reade