

PD12929 – PB/JLLondon Borough of Camden
Planning - Development Control,
Camden Town Hall,
London,
WC1H 8ND**F.A.O.** Elaine Quigley

01 June 2022

Submitted via the Planning Portal under Ref: PP-11295137

Dear Elaine

**TEMPLAR HOUSE, 81-87 HIGH HOLBORN, LONDON WC1V 6NU
TOWN & COUNTRY PLANNING (CONTROL OF ADVERTISEMENTS) (ENGLAND) REGULATIONS 2007
CONSENT TO DISPLAY AN ADVERTISEMENT ON EXISTING CONSTRUCTION HOARDING**

On behalf of our client, CER Investment SARL (the 'Applicant'), we hereby enclose an application for Consent to Display an Advertisement ('this / the Application') which seeks the installation of signage on the existing construction hoarding placed around the perimeter of Templar House, 81-87 High Holborn, London WC1V 6NU (the 'Site'). The Application has been submitted via the Planning Portal (PP-09855154).

Application Context

CER Investments SARL purchased the Site on 28 September 2019, with the intention for Uncommon to both own, occupy and manage the commercial floorspace. To facilitate this objective, three standalone planning applications were submitted and duly approved (refs. 2020/1310/P, 2020/1350/P and 2020/1351/P). Since this point, the Scheme has been subject to amendments and is now being built-out in accordance with the latest position, with construction works progressing well.

Driven by a desire to bring the building back in to functional and operational use at the earliest opportunity, our Client has been reviewing the existing, blank site hoarding and has recognised an opportunity to ensure that this part of the Site is to be informative and can add both interest and vitality to the street scene, over the course of the construction works. In this context, the Applicant is seeking to install advertisements to the existing construction hoarding placed on High Holborn, and further information is provided within the Hoarding Design Document, which forms part of the submission.

Legislative Context

Part 1 Regulation 3 of the Advertisement Regulations state that the only issues to be considered in the determination of advertisement applications are amenity and public safety. In respect of amenity Regulation Part 2a states:

“factors relevant to amenity include the general characteristics of the locality, including the presence of any feature of historic, architectural, cultural or similar interest.”

In respect of public safety Regulation Part 2b states factors relevant to public safety include:

- i. *“the safety of persons using any highway, railway, waterway, dock, harbour, or aerodrome (civil or military);*
- ii. *whether the display of the advertisement in question is likely to obscure, or hinder the ready interpretation of, any traffic sign, railway signal or aid or navigation by water or air;*
- iii. *whether the display of the advertisement in question is likely to hinder the operation of any device used for the purpose of security or surveillance or for measuring the speed of any vehicle.”*

Statutory Framework and Assessment

National Planning Policy Framework

The National Planning Policy Framework (the “NPPF” / the “Framework”) was last published in July 2021 and supersedes previous iterations. The Framework sets out the Government’s approach to planning matters, and is a material consideration in the determination of planning applications. Paragraph 136 states:

“the quality and character of places can suffer when advertisements are poorly sited and designed. 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.”

The Development Plan

Section 38(6) of the Planning & Compulsory Purchase Act (2004) requires applications to be determined in accordance with the Development Plan, unless material considerations indicate otherwise, and comprises the following:

- The London Plan (2021); and
- The LBC Local Plan (2017).

Policy D4 (Advertisements) of the LBC Local plan 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 and be of the highest standard of design, material and detail.

The Council will support advertisements that preserve the character and amenity of the area; and preserve or enhance heritage assets and conservation areas, and such advertisements are subject to further criteria as set out in supplementary planning document Camden Planning Guidance on advertisements. This states

“Advertisement hoardings or posters will not usually be acceptable in predominantly residential areas and will be carefully controlled in conservation areas and on or near listed buildings to ensure that they do not detract from the area’s and building’s character and appearance. However, if an area has a mix of uses or is predominantly in commercial use, some poster or hoarding advertising may be acceptable where they satisfactorily relate to the scale of the host building or feature and its surroundings. They should be designed and positioned as an integral feature of the building.”

The proposals make a positive contribution to the area during the continuing construction period / on-site works and would not harm visual or aural amenity or public safety. The hoarding is informative, and improves the

interest and vitality of the street scene and provide further information in relation to the completed development. It would also deter potential graffiti, and this should be considered a significant benefit in this instance when compared to the existing blank, white hoarding.

Uncommon has created a portfolio of workspaces with a focus on providing supportive working environments, with an emphasis on design-led spaces and health & wellbeing. The proposed signage is simple, temporary and clearly associated with the redevelopment of the Site and it must therefore be assessed in this context from an amenity perspective. The signage fits within the extent of the construction hoarding and uses colours that are clear in appearance and appropriately relate to the Site, its surroundings and the future use of the space. The hoarding is to be externally illuminated, at an appropriate level of luminosity, in-keeping with the highly commercial nature and character of High Holborn

From a legislative and planning policy perspective the proposals accord with the Development Plan for the London Borough of Camden, resulting in an improvement to the quality of the building's appearance and the contribution which it makes to the character and appearance of the Bloomsbury Conservation Area, throughout the ongoing construction period whilst ensuring the safety and visual enjoyment of this area for a temporary period before the Site is brought into operational use, in 2023.

Administrative Matters & Closings

The submission comprises the following documents, which have been submitted via the Planning Portal:

- Application Form;
- Covering Letter;
- Site Location Plan; and
- Hoarding Design Document.

The application fee of £462.00 has been calculated in accordance with the Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) Regulations, and paid via the Planning Portal.

We trust the information submitted is in order and allows you to validate and determine this application, however, should you require further details please contact James Leuenberger at this office in the first instance.

Yours sincerely,



Montagu Evans LLP
Enc.