

Date: 03/10/2022  
Your Ref: APP/X5210/H/22/3298706 &  
APP/X5210/W/22/3298715  
Our Ref: 2021/0199/A & 2021/2890/P

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Bristol BS1 6PN

Dear Darren,

**Town and Country Planning (Control of Advertisements) (England) Regulations  
2007, Town and Country Planning Act 1990  
Appeals by University College London Hospitals NHS Foundation Trust  
Site Address: 235 Euston Road, London, NW1 2BU**

I write in connection with the above appeals against the refusal of advertisement consent (Ref. 2021/0199/A) and planning permission (Ref: 2021/2890/P) for the ***Display of digital advertising screen (designated display area measuring 12m high by 8m wide) on the north west splay corner of the Hospital building on junction between Euston Road and Tottenham Court Road (following replacement of curved section of glazed 'skin');*** and ***Installation of 5 air purifier units positioned at 1st floor level and replacement of curved section of glazed 'skin' with digital advertising screen located on the north west splay corner of the Hospital building on junction between Euston Road and Tottenham Court Road respectively.***

## **1.0 Summary**

- 1.1 The application site comprises a hospital building (University College Hospital) which is divided between a 5-storey block and a 17-storey tower. The application relates to the north-west elevation or splay corner of the building facing the Euston Circus junction of Euston Road and Tottenham Court Road.
- 1.2 The application site is bounded by Euston Road to the north, Gower Street to the east, Grafton Way to the south and Tottenham Court Road to the west. The site lies within the Central London Area and is located on the Strategic Road Network (SRN) on A400 Tottenham Court Road west. The Transport for London Road Network

(TLRN) is located north on A400 Hampstead Road and A501 Euston Road. TfL is the highway authority for the TLRN.

1.3 The site is not listed nor located within a conservation area. Fitzroy Square Conservation Area is situated immediately opposite the site to the west, while Bloomsbury Conservation Area is situated to the east. The site is located within both the Fitzrovia East Neighbourhood and Fitzrovia Action Areas.

1.4 Advertisement consent was refused on 16th March 2022 (a copy of the decision notice was sent with the questionnaire) for the display of digital advertising screen (designated display area measuring 12m high by 8m wide) on the north west splay corner of the Hospital building on junction between Euston Road and Tottenham Court Road (following replacement of curved section of glazed 'skin'). It was refused for the following reasons:

- 1. The proposed advertisement, by virtue of its size, siting, prominent location on the building and method of illumination, would add prominent visual clutter and appear as an incongruous and unduly dominant addition, which would have a harmful effect on the visual amenity of the host building, street scene, the wider Fitzrovia East Neighbourhood Area and the Fitzroy Square Conservation Area located opposite, contrary to Policies D1 (Design), D2 (Heritage) and D4 (Advertisements) of the Camden Local Plan 2017 and Part 3 (Vision and objectives) of the Fitzrovia Area Action Plan 2014.*
- 2. The proposed advertisement, by virtue of its size, siting, prominent location on the building and method of illumination, would in combination with existing digital advertising signage located on the western side of the Euston Underpass, and its proximity to signalled controlled pedestrian crossings, introduce a distraction to traffic and pedestrians, causing harm to highway and public safety, contrary to Transport for London guidance, and Policies A1 (Managing the Impact of Development), D4 (Advertisements) and T1 (Prioritising walking, cycling and public transport) of the Camden Local Plan 2017.*

1.5 Planning permission was refused on 16th March 2022 (a copy of the decision notice was sent with the questionnaire) for the installation of 5 air purifier units positioned at 1st floor level and replacement of curved section of glazed 'skin' with digital advertising screen located on the north west splay corner of the Hospital building on junction between Euston Road and Tottenham Court Road. It was refused for the following reason:

- 1. In the absence of sufficient supporting information for the proposed air purifier units, the proposal fails to demonstrate any significant and measurable improvement in air quality in the locality, and would not constitute sustainable development, contrary to Policies CC1 (Climate change mitigation), CC2*

*(Adapting to climate change) and CC4 (Air quality) of the London Borough of Camden Local Plan 2017.*

- 1.6 The Council's case is set out in detail in the Officer's Delegated Report and it will be relied on as the principal Statement of Case. The report details the application site and surroundings, the site history and an assessment of the proposal. A copy of the report was sent with the questionnaire.
- 1.7 In addition to the information sent with the questionnaire, I would be pleased if the Inspector could also take into account the following information and comments before deciding the appeal.

## **2.0 Status of Policies and Guidance**

- 2.1 In determining the above mentioned application, the London Borough of Camden has had regard to the relevant legislation, government guidance, statutory development plans and the particular circumstances of the case. The full text of the relevant policies was sent with the questionnaire documents.
- 2.2 The London Borough of Camden Local Plan 2017 (the Local Plan) was formally adopted on the 3 July 2017 and has replaced the Local Development Framework Core Strategy and Camden Development Policies documents as the basis for planning decisions and future development in the borough. The relevant Local Plan policies as they relate to the reasons for refusal are:

- A1 Managing the impact of development
- A4 Noise and vibration
- C1 Health and wellbeing
- D1 Design
- D2 Heritage
- D4 Advertisements
- G1 Delivery and location of growth
- T1 Prioritising walking, cycling and public transport
- CC1 Climate change mitigation
- CC2 Adapting to climate change
- CC4 Air quality

- 2.3 The Council also refers to the following supporting guidance documents:

Camden Planning Guidance

- CPG Design 2021 - chapters 2 (Design excellence), 3 (Heritage) and 7 (Designing safer environments)
- CPG Transport 2021 - chapters 7 (Vehicular access and crossovers) and 9 (Pedestrian and cycle movement)
- CPG Air Quality 2021 – chapters 2 (Air quality in Camden), 3 (Assessing air quality impacts) and 4 (Minimising emissions into the air)

- CPG Energy efficiency and adaption 2021 – chapter 8 (Energy efficiency in buildings) and 10 (Sustainable design and construction principles)
- CPG Advertisements 2018 – paragraphs 1.1 to 1.23 (General advertising guidance); and 1.34 to 1.38 (Digital advertisements)
- CPG Amenity 2021 - chapters 4 (Artificial light) and 6 (Noise and vibration)
- CPG Planning for health and wellbeing 2021 – chapters 1 (Planning for health and wellbeing in Camden) and 2 (How planning can influence health and wellbeing)

Other guidance:

- Camden Clean Air Action Plan 2019-2022
- Fitzroy Square Conservation Area Appraisal and Management Plan (adopted March 2010)
- Fitzrovia Area Action Plan - Part 3: Vision and objectives (adopted March 2014)
- Bloomsbury Conservation Area Appraisal and Management Strategy (adopted April 2011)

2.4 The Council also refers to the following legislation, policies and guidance within the body of the Officer's Report:

- National Planning Policy Framework (2021)
- London Plan (2021)
- Digital Roadside Advertising and Proposed Best Practice (commissioned by Transport for London) March 2013

### **3.0 Comments on the Appellant's Grounds of Appeal**

3.1 The appellant's grounds of appeal are summarised as follows:

1. Public benefit
2. Revised luminance level and images
3. Highways and road safety
4. Air quality and clean air
5. Delay and engagement
6. Precedent for digital advertisements

### **4.0 Public benefit**

4.1 The Appellant states in the first ground of appeal that the proposal would provide significant benefits to the NHS health trust, the local community and to people working in and visiting the area.

### **5.0 Response to ground of appeal 1**

5.1 Consideration has been given during the assessment of the application to the potential contribution of the proposed digital advertisement screen to the community in the form of health-based and public messaging from digital signage, as well as,

the potential health benefit arising from any reduction in air pollution following the installation of air cleaning technology.

- 5.2 However, while improvements in air quality are very important within Camden and London generally, it is considered that the supporting information does not provide any actual data, independent or peer-reviewed study/certification or convincing evidence to suggest that the 5 proposed air purifier units would deliver any measurable or significant impact upon air quality or public health in the vicinity of the installation.
- 5.3 Furthermore, there is also concern in regard to the energy consumption of the purifier units which would presumably operate 24 hours a day in order to provide any intended benefit. No information has been provided in regard to the performance or efficiency of the units, nor how much electricity would be required to work the units compared with any potential air quality or other benefit that might arise from the proposal. In addition, there is concern about the lack of detail in relation to how the units would be maintained to ensure that they continue to operate efficiently and sustainably, particularly given the likely difficulties accessing the units on a regular basis given their position.
- 5.4 It is therefore not clear from the supporting information provided that the proposed alterations would constitute a sustainable development that would achieve the intended aims in accordance with Local Plan Policies CC1 and CC2 which require that all development should be resilient to climate change and adopt and demonstrate appropriate sustainable development principles and climate change adaptation measures in any proposed design, implementation and ongoing maintenance programme.
- 5.5 Given the lack of convincing and demonstrable evidence provided by the Appellant in regard to the above concerns, the degree of benefit arising to the public from the proposal as asserted by the Appellant is questionable. When this is assessed alongside the significant design, transport and sustainability concerns raised by the Council (the Planning Inspector is referred to Section 3 and Paragraphs 4.17 - 4.27 of the Officer's Delegated Report in this regard), any limited public benefit is not considered to outweigh the significant harm that would be caused in visual amenity terms within the street scene and surrounding area, and in highway and public safety terms within the locality.

## **6.0 Revised luminance level and images**

- 6.1 The Appellant states that the luminance level for the proposed digital advertisement screen could be revised to a maximum of 300 cd/m<sup>2</sup> so as to reduce the visual impact of the display using transparent LED technology. Some additional guidelines and revised images showing the screen with reduced brightness have also been provided.

## **7.0 Response to ground of appeal 2**

- 7.1 Consideration has been given by the Council when assessing the signage proposals to the use of the Appellant's patented transparent LED display technology and the merits associated with it as expressed in the supporting information, including the proposed display conditions and protocols.
- 7.2 The Appellant has confirmed in the appeal statement that a revised maximum luminance level of 300 cdm<sup>2</sup> is now possible for the proposed digital advertisement screen. No details have been provided as to whether this level would apply to a full 24 hour period, 7 days a week, or for some other period (e.g. during the day or night only). Nevertheless, any reduction in luminance levels is welcomed by the Council and could be secured by condition should this appeal be allowed. The Appellant has also provided some images of screens displayed within an indoor shopping centre.
- 7.3 Notwithstanding the above, while it is accepted that all advertisements are intended to attract attention and that certain aspects of the display can be controlled by condition (such as, luminance levels, transition, sequencing, etc.), the addition of an illuminated digital advertisement in this location, even considering the use of transparent LED display technology as shown by the additional images and with a reduced luminance level, is not considered to mitigate against the significantly adverse impact of such a screen which would be particularly conspicuous and eye-catching, especially given that it is proposed to be active throughout a 24 hour period, 7 days a week.
- 7.4 In this regard, it is noted in 4 appeals for comparable illuminated digital advertisement displays (see Appendix A) dated 22/05/2018 (Ref: APP/H5390/Z/17/3192478 (Appeal B); APP/H5390/Z/17/3192472 (Appeal B); APP/H5390/Z/17/3192470 (Appeal B); APP/H5390/Z/17/3188471 (Appeal B), the Planning Inspector commented that while the luminance level and rate of image transition could be controlled by condition, the appeal proposal would nevertheless create an isolated and discordant feature. In each case, the display of a sequential series of static digital images was considered to be conspicuous and eye-catching, and as such, would have a harmful effect upon visual amenity. The Inspector is respectfully requested to dismiss this appeal on similar grounds.
- 7.5 As such, the suggested revision would not overcome Council concern that the proposed advertisement, by virtue of its size, siting, prominent location on the building and method of illumination, would add prominent visual clutter and appear as an incongruous and unduly dominant addition, which would have a harmful effect on the visual amenity of the host building, street scene, the wider Fitzrovia East Neighbourhood Area and the Fitzroy Square Conservation Area located opposite (the Inspector is referred to Paragraphs 3.01 – 3.21 of the Officer's Delegated Report for full details in this regard).

7.6 The proposal also continues to raise significant highway and public safety concerns (see Paragraphs 3.22 – 3.32 of the Officer's Delegated Report).

7.7 Should the Inspector be minded to allow the appeal, conditions to control the brightness, orientation and frequency of the displays, and to prevent any moving displays are listed to be attached to any advertisement consent (see Appendix B).

## **8.0 Highways and road safety**

8.1 The Appellant argues that expert traffic reports (from Bellamy Roberts Highway, Transportation and Infrastructure Consultants) demonstrate that the digital advertisement would not harm road safety.

## **9.0 Response to ground of appeal 3**

9.1 Contrary to the Appellant's view, the Council considers that the proposal raises significant highway and public safety concerns (the Planning Inspector is referred to Paragraphs 3.22 – 3.32 of the Officer's Delegated Report in this regard).

9.2 This concern arises in particular given the proximity of the proposed large digital screen to busy pedestrian crossings and traffic signal controlled junctions (the application site is within 20m of pedestrian crossings on both Euston Road and Tottenham Court Road) and through the resultant distraction caused for both pedestrians and drivers. This would especially be the case in relation to road users approaching the crossings at the Euston junction, most notably in relation to southbound road traffic approaching the junction from Hampstead Road, eastbound traffic approaching from Euston Road and northbound traffic approaching from Tottenham Court Road.

9.3 The proposal also raises public safety concern for eastbound road users on their approach from the west along Euston Road, due to the combined effect of unsynchronised image transition of both existing (above the nearby Euston Underpass) and proposed digital advertising signs operating in close proximity to each other. Section 4.3 of Transport for London's (TfL) 'Guidance for Digital Roadside Advertising and Proposed Best Practice' states that *'drivers should only see the details of a roadside digital advertisement of one screen, or a pair of synchronised screens, at a time. This is to ensure that multiple images do not change at different times, which can add to driver distraction.'*

9.4 Overall, therefore, the proposal is contrary to the above TfL guidance and Local Plan Policies A1 (Managing the Impact of Development), D4 (Advertisements) and T1 (Prioritising walking, cycling and public transport), and related planning guidance.

9.5 The Appellant also argues that the submission of a Highway Statement and additional addendum reports, including accident data analysis and an assessment of

impacts of two advertising displaying signage in close proximity, demonstrate that the digital advertisement screen would not harm road safety.

- 9.6 However, this additional information, as well as, any suggested conditions and protocols suggested in relation to the operation of the proposed sign were reviewed by both TfL and the Council's Highways Team. After consideration of this additional information, both confirmed that they still had outstanding concerns for the reasons outlined above (and as stated in more detail in Paragraphs 3.22 – 3.32 of the Officer's Delegated Report) and did not support the proposals. The Inspector is therefore respectfully requested to dismiss the appeal on that basis.

## **10.0 Air quality and clean air**

- 10.1 The Appellant claims in regard to the effectiveness of the proposed clean air technology that support was received on record from Tom Parkes (a Council's Senior Air Quality Officer). It is further asserted by the Appellant that the Council has not applied Camden Clean Air Action Plan 2019-2022 when assessing the appeal proposals.

## **11.0 Response to ground of appeal 4**

- 11.1 The Appellant is referring to an initial informal response from Tom Parkes (a Council Senior Air Quality Officer) which is partially quoted in the covering letter attached to the application submission. The full response and more clarity in the Council's view reads: *'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. That said, whilst we encourage the project and support it in principle I am completely separate from Camden's planning service and have no influence on those decisions. If they seek our input then I can of course provide some insight from an air quality perspective, but prior to that I would not seek to get involved in the approval process.'*
- 11.2 Given that Camden was the first local authority to commit to the ambitious World Health Organization air quality standards and actively seeks to create a borough in which no one suffers ill-health as a result of the air they breathe, as evidenced in Camden's Clean Air Action Plan 2019-2022, it follows that the Council supports in principle any proposals that might improve air quality. The above response from the Air Quality Officer reflects this. However, it is based on an initial informal contact and prior to any details or information being provided, and therefore, it was made in the absence of any detailed consideration, hence, the support was *in principle*. The response also pre-dates any pre-application or full application considerations where some details were provided by the Appellant.
- 11.3 Having had an opportunity at a later date to assess any details provided by the Appellant during the course of the full planning application process, including an assessment by the same Senior Air Quality Officer, it is considered by the Council



that the supporting information does not provide any actual data, independent or peer-reviewed study/certification or convincing evidence to suggest that the 5 proposed air purifiers would deliver any measurable or significant impact upon air quality or public health in the vicinity of the installation (the Planning Inspector is referred to Paragraphs 4.17 - 4.27 of the Officer's Delegated Report in this regard).

- 11.4 The Council was mindful throughout the course of the application of the strategy and aims as set out by the Camden Clean Air Action Plan 2019-2022 and applied them during the assessment of the application. The Council therefore strongly disputes the Appellant's unsubstantiated claim that this was not the case.

## **12.0 Delay and engagement**

- 12.1 The Appellant expresses frustration at the delay in progressing the application and states that there was a lack of engagement by the Council throughout the process. The Appellant claims in particular that there was not an opportunity to provide further details or to verify the technology's credentials.

## **13.0 Response to ground of appeal 5**

- 13.1 With regard to the length of time taken to process the application, it is firstly noted that a full planning application was submitted to the Council on 14/06/2021 via the Planning Portal. Both the planning and advertisement consent applications were then registered on 07/07/2021. The Appellant acknowledges that the COVID-19 pandemic played a part in processing delays, and as such, while the Council always seeks to process applications as quickly as possible, a period of 23 days between receipt and registration is not considered to be excessively long under the circumstances.
- 13.2 It is also noted that during the course of the application, the Appellant confirmed to the Council on 24/08/2021 that their highway consultants were in the process of producing a detailed report to address TfL comments. This report was received by the Council on 05/11/2021, and as such, accounted for a significant part of any delay in processing while the Council waited for the information to be received from the Appellant.
- 13.3 The Appellant was then informed on 20/01/2022 that the application would be recommended for refusal with an explanation for the reasons why this was the case; this being the earliest opportunity to bring the matter to the Appellant's attention.
- 13.4 With regard to the level of engagement by the Council with the Appellant, from the time of initial receipt of the advertisement consent application to the point where final decision notices were issued on 16/03/2022, the Council engaged openly with the Appellant on several occasions by telephone, as well as, corresponding via email between 20-30 times concerning the position of the applications at those particular points and also at relevant times requesting further information. The Council

therefore considers that the Appellant has had adequate opportunity to discuss the proposals further on many occasions and to submit any additional information. In fact, the Appellant has submitted revised or additional information on a number of occasions during the course of the application (one particular instance being noted in Paragraph 13.2 above).

- 13.5 In regard to the Appellant's particular claim concerning an alleged lack of opportunity to provide further details for the air purification technology, the Appellant confirmed at the time of the application submission that their air purification partner had developed a newer and smaller product (Halfero unit) which was in the final stages of testing, and as a consequence some details were not available. There were also commercial sensitivities regarding the product's performance data being publicised pre-launch. The appeal statement also refers to the proposed air purification technology as '*ground breaking technology*' in the appeal statement.
- 13.6 While the lack of available information is perfectly understandable for a new product, the Council must consider the proposal on its own individual merit based on the information available at the time. As stated above, the Council considers that the Appellant has had adequate opportunity during the course of the application to submit any additional information should further information have become available post-testing.
- 13.7 The Council also brings to the Planning Inspector's attention that the installation of air purifier units are considered by the Appellant to be an integral component of the overall proposals which also involve the display of advertisements on a new digital screen. The advertising revenues from the screen are intended to fund the acquisition, operation and maintenance of the proposed air purifier units, and both elements are therefore contingent on each other.
- 13.8 Given the integrated and combined nature of both the planning and advertisement consent applications as a whole, it is emphasised that even if the proposal to install air purifier units could be supported by the Council, which is not possible in this case, it would unlikely outweigh the strong and significant concerns raised in regard to the proposed digital advertisement screen in terms of the resultant harm to visual amenity and public safety (see Section 3 of the Officer's Delegated Report).
- 13.9 It was on that basis that the Appellant was advised by the Council on 20/01/2022 that any revisions or additional information in regard to the air purifier units or related technology could not result in a favourable outcome given the significant signage concerns, and therefore, the submission of further information at that time was not encouraged. Following a subsequent discussion between the Council and the Appellant (as outlined in Paragraph 5.1 of the Officer's Delegated Report), the Appellant indicated that it may be possible to provide additional information in the future which might overcome Council concerns. Notwithstanding that the Council has strong concerns in regard to the display of a large advertisement screen at the application site for the reasons set out in the Officer's Report, the Council confirmed

to the Appellant that it would be happy to consider a stand-alone planning application in the future for air purification units should the necessary details and evidence become available.

#### **14.0 Precedent for digital advertisements**

- 14.1 The Appellant argues in support of the proposals that there are many established advertising precedents in the immediate area. The Appellant also asserts that the proposed digital screen is considerate to the host building and environment by using appropriate display technology; would be in keeping with the design philosophy of the host building; and would fit with the surrounding area which is predominantly commercial.

#### **15.0 Response to ground of appeal 6**

- 15.1 Contrary to the Appellant's view, the proposed large digital advertisement screen would appear out of character within the locality which is generally absent of large illuminated signage of any kind, save for digital signage located above the Euston Underpass. Smaller digital or illuminated advertising signs are noted as being more appropriately displayed and concentrated at fascia or street level (the Inspector is referred to Paragraphs 3.33 – 3.37 of the Officer's Delegated Report for full details in this regard).
- 15.2 The Planning Inspector noted in his appeal decision (APP/X5210/H/12/2189379 – Appendix C) when dismissing an appeal in regard to a 2012 application for the proposed display of a large digital screen at the appeal site that *'the area is dominated by large scale buildings and roads, has extensive street lighting and is essentially commercial in character. There is also a great deal of advertising, including media screens. However, this is concentrated at street level. I saw during my site visit that, 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'*. And went on to say that *'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.'*
- 15.3 The Planning Inspector noted in his appeal decision (APP/X5210/H/13/2208080 – Appendix D) when dismissing an appeal in regard to a 2013 application for the proposed display of a large digital screen at the appeal site that the proposal *'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.'* And further, the Inspector considered that the proposal would *'serve to alienate the pedestrian by drawing attention away from street level. As such, the proposal would result in a visual marker that would jar with overall character of the area, resulting in a negative visual impact.'*

- 15.4 The display area of the proposed screen (approximately 96 sqm) would be considerably larger in size than the digital screens refused and dismissed on appeal in 2012 and 2013 respectively. These applications proposed designated display areas of 72 sqm and 30 sqm respectively. Given the similar site location, high position above fascia level and larger size of the current proposal relative to the 2 previously refused applications, as well as, the relatively unchanged character of the locality since 2013, it is considered that impact of the proposed digital screen would be equally unacceptable for similar reasons to those stated in the 2 dismissed appeals.
- 15.5 The exceptions for signage in the locality are 2 large LED screens located above the nearby Euston Underpass which runs below the Euston Circus junction and which were approved in 2011 (2010/6613/A and 2010/6615/P). However, these are not considered by the Council to serve as a precedent for the appeal proposal, particularly as they are noted as being smaller in size than the appeal proposal, project only 2.7m in height above street level and are located above a vehicle-only part of the road. Therefore, along with conditions restricting the operation of the signs, the mitigating factors set out above meant that the LED screens were considered to be acceptable at the time.
- 15.6 It is important to note that the presence of this existing Euston Underpass signage as approved in 2011 and the cumulative visual impact that an additional large sign might have in the locality was taken into consideration by the Planning Inspector when dismissing respectively appeals for similar proposals in 2012 and 2013 referred to above (APP/X5210/H/12/2189379 & APP/X5210/H/13/2208080 – see Appendices C and D).
- 15.7 In summary, contrary to the Appellant's view, and taking into account the Inspector's comments on previously refused proposals, the Council considers that the proposed digital screen would, due to its location, size and elevated position above fascia level (rising up to nearly 19m above street level), appear particularly prominent in this context and stand out as a strident and intrusive example of unnecessary visual clutter. As such, the proposed screen would appear as an incongruous and unduly dominant addition, which would have a harmful effect on the visual amenity of the host building, street scene and wider Fitzrovia East Neighbourhood Area, as well as, be harmful to the character and setting of the Fitzroy Square Conservation Area located directly opposite the application site, contrary to the policies and guidance stated above and in the Officer's Report.
- 15.8 Notwithstanding the above, the Council also considers that the proposal raises significant highway and public safety concerns (the Planning Inspector is referred to Paragraphs 3.22 – 3.32 of the Officer's Delegated Report in this regard).

## **16.0 Conclusion**

- 16.1 Having regard to the entirety of the Council's submissions, including the content of this statement and attached appendices (listed below for ease of reference), the Inspector is respectfully requested to dismiss the appeal.
- 16.2 If any further clarification of the appeal submissions are required, please do not hesitate to contact Tony Young on the above direct dial number or email address.

Yours sincerely,

**Tony Young**

Planning Officer - Planning Solutions Team  
Supporting Communities Directorate  
London Borough of Camden

## **List of Appendices**

**Appendix A:** List of recent planning appeal decisions (x4 in total) – all x4 planning & advertisement consent appeals dismissed dated 22/05/2018

**Appendix B:** Suggested conditions (Advertisement consent Ref. 2021/0199/A)

**Appendix C:** Appeal decision (APP/X5210/H/12/2189379) – dismissed 11/07/2013

**Appendix D:** Appeal decision (APP/X5210/H/13/2208080) – dismissed 31/12/2013