

[REDACTED]
[REDACTED]
[REDACTED]
email: [REDACTED]
Tel : [REDACTED]

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

20th October 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 south side of Euston Road.

The application sites 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 site is opposite Kings Cross main line railway station. The surroundings are predominantly commercial in character and the displays are located outside a McDonalds, a Post Office and a bar/restaurant. The A501 Euston Road is a 5-lane, well-lit main arterial road and is a very heavily trafficked part of the ring road surrounding the London Congestion Charging zone. The Euston Road at this point is dominated by the road and rail 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.

There are two similar sized digital advertisements immediately opposite this site outside Kings Cross Station on two bus shelters. These advertisements were granted consent on appeal (Reference 2016/1582/A).

There are also other advertisement displays of various sizes associated with the commercial units and shops in the immediate area.

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 conditions 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 area and a well-lit five lane arterial road and the area has large buildings of a substantial scale. It is believed the size and scale of the proposed advertisements are modest located on a functional and utilitarian underground entrance and they would not be out of place set against the surrounding shopfronts.

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 a 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.

Conservation Area

The site is located within the Kings Cross Conservation Area but near to the boundary of the Conservation Area. However, we believe the Conservation Area should not preclude the display of advertisements altogether.

It is suggested that this part of Euston Road has a commercial character of its own and this site is not within the core residential streets of the Kings Cross Conservation Area. The immediate surroundings of the site are completely dominated by the Euston Road and the transport network. Whilst it is accepted that advertisements may not be appropriate on residential and smaller roads they are usually appropriately sited on large highways. The road system has 5 lanes at this point and is a well-lit major arterial road. It is on these types of trunk routes that advertisements may be acceptable and appropriate.

There is a mix of old and new buildings in the immediate vicinity. The juxtaposition of old and new is an accepted part of the architectural fabric and very widespread throughout London. Modern buildings and features such as digital advertising, as well as historic buildings are what makes London a great cosmopolitan capital city.

Many conservation areas include predominantly commercial, shopping and business uses where advertising may be appropriate when care is taken so that the displays are compatible with their surroundings. In such overtly commercial settings, the public is used to seeing and expects to see a range of commercial images and these advertisements form part of the areas profile and character.

In London many old buildings have retained their original facades and architectural features on the upper floors but the ground floor street level facades have been renovated to include more modern materials and advertising signage. This is the case of the buildings behind the application site and it is the active street level use of the building which defines the shopping parade and immediate area.

We believe that these LCD advertisements, located at ground floor street level, will not be out of place in such a busy urban context.

Due to its location on the Euston Road the applicants submit that this location and this site, should be suitable for advertising displays without negatively impacting the heritage of the surrounding area. It is a commercial city centre area that should be able to accommodate some small, high-quality advertising displays.

As stated above consent has previously been granted in the same Kings Cross Conservation Area for two digital advertisements on the bus shelters outside Kings Cross Station, immediately opposite this site (Reference 2016/1582/A).

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 high quality displays.

This type of small 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

A solid black rectangular box used to redact the signature of the applicant.