



Appeal Decision

Site visit made on 9 June 2025

by Mrs Chris Pipe BA(Hons), DipTP, MTP, MRTPI

an Inspector appointed by the Secretary of State

Decision date: 01 August 2025

Appeal Ref: APP/A5840/Z/25/3363661 20-25 Camberwell Green, London SE5 7AA

- The appeal is made under Regulation 17 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 against a refusal to grant express consent for the display of an advertisement.
 - The appeal is made by King Media Ltd against the decision of the Council of the London Borough of Southwark.
 - The application Ref is 24/AP/3746.
 - The development is display of one externally illuminated advertisement sign (6.81m x 6.41m) at 20-25 Camberwell Green within temporary scaffolding shroud, incorporating a 1:1 facsimile of the building and its architectural features printed on it.
-

Decision

1. The appeal is dismissed.

Main Issues

2. The main issues are the effect of the advertisement on (i) the amenity of the area; and (ii) public safety.

Reasons

Amenity

3. The appeal site is a group of four, four storey Victoria properties (No's 20-25 Camberwell Green), located within in a highly prominent location fronting the intersection of Camberwell Church Street, Camberwell New Road, Camberwell Park and Denmark Hill. The appeal site is within a busy predominantly commercial area, located within the Camberwell Green Conservation Area. There are a number of listed buildings nearby notably No. 2 Camberwell Church Street along with No's 15 and 17 Camberwell Church Street and 323 Camberwell New Road. I also note that the appeal site comprises locally listed buildings.
4. Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (LBCA Act) requires decision makers, when considering whether to grant planning permission, to have special regard to the desirability of preserving the listed building or its setting or any feature of special architectural or historic interest which it possesses. A similar requirement applies to conservation areas under the statutory duty imposed by section 72(1) of the LBCA Act where I am required to have special regard to the effect of the proposed development on the character or appearance of the area.

5. Paragraph 212 of the National Planning Policy Framework (2024) (the Framework) states that great weight should be given to the conservation of a designated heritage asset when considering the impact of a proposal on such an asset. This is irrespective of the level of harm.
6. Advertisements within the area are in general smaller than the appeal proposal, comprising predominantly fascia signs and projecting signs.
7. The area contains distinctive three and four storey blocks of buildings which typically have ornate upper storeys, creating a strong architectural rhythm. The significance of the Conservation Area, in my view is the architecture and features of the commercial façades. The corner buildings comprising the appeal site make a positive contribution to the character and appearance of the Conservation Area.
8. The proposed advertisement would be located relatively centrally on a shroud covering the main elevation of No's 21-22 Camberwell Green and would be externally illuminated. The shroud would cover the scaffolding proposed to be erected whilst works are being carried out to the appeal site and would have a facsimile of the buildings and architectural features printed on it.
9. From the information provided I note that advertisement consent was refused and dismissed at appeal¹ for the appeal site. The proposal before me is a reduction in size and illumination from that of the previous proposal. The appellant confirms that the proposed advertisement would cover approximately 11.29% of the shroud.
10. My attention has been drawn to an allowed appeal² for an advertisement on a shroud opposite the appeal site, which I understand was 'renewed' by the Council in December 2023. I note that the Inspector placed weight on the replicated appearance of the building proposed on the shroud. Finding that whilst the advertisement would obscure part of the image, it would not prevent an observer from appreciating the overall appearance and symmetry of the building beneath.
11. Similarly, in an allowed appeal³ for an advertisement on a shroud reflecting the architectural detailing of the building, 3 Camberwell Church Street the Inspector found that it would effectively screen unsightly scaffolding and be preferable to plain shrouding that can appear unattractive. The Council contend that these appeals are difference in scale of advertisements, and architectural and historic context to that of the appeal before me. Nevertheless, I find that the shroud with replicated buildings printed on it along with the proposed advertisement for a temporary period of 10 months would not harm the setting of the nearby listed buildings and would be preferable to a blank shroud covering these prominent buildings.
12. I note that the shroud in this appeal is anticipated to be in place for 10 months, that the advertisement would change every 14 days and that it is estimated that for 50% of the time the shroud would be advertisement free, displaying the facsimile of the buildings only.
13. The appellant also states that they would be committed to donating advertisement space to their charity partner, Black Blossoms allowing them to deliver imagery which is culturally and artistically linked to the local area for a period of 35% of the

¹ APP/A5840/Z/23/3319181

² APP/A5840/Z/20/3246834

³ APP/A5840/Z/20/3257348

time or 14 weeks whichever is greater. Whilst a condition has been proposed by the appellant, I am not persuaded that this would meet the requirements for the imposition of conditions outlined in the Framework.

14. In assessing amenity, I have considered the advertisements within the area whilst the prevailing advertisements are located on shop fronts the proposed advertisement would respect the character of the area and not create a proliferation of advertisements in the area. I conclude that the display of the proposed advertisement would not be detrimental to the amenity of the area.
15. The proposed development would not conflict with Policies D4 and HC1 of the London Plan (2021); and Policies P13, P14, P19, P20, P21, P26 and P43 of the Southwark Plan (2022) in so far as they relate to amenity. Given I have concluded that the proposal would not harm amenity, the proposal does not conflict with these policies.
16. I find no conflict with the Framework which seeks to protect the quality and character of places from poorly sited and designed advertisements.

Public Safety

17. The appeal site fronts a busy signalised intersection and would be obvious to road users. The proposal differs from the previous appeal proposal at the site in terms of a reduced scale, reduced illumination level and hours of illumination. Even so, the National Planning Practice Guidance⁴ confirms that all advertisements are intended to attract attention but proposed advertisements at points where drivers need to take more care are more likely to affect public safety. For example, at junctions, roundabouts, pedestrian crossings, on the approach to a low bridge or level crossing or other places where local conditions present traffic hazards.
18. The appellant has provided an Advertising Safety Guidance Form (ASGF) prepared by Waterman Infrastructure and Environment Ltd which contains accident data from January 2018 to December 2022 inclusive, which specifies 45 collisions were recorded within a 5 year period in the vicinity of the junction, resulting in a total of 54 casualties. The appellant contends that the site is located in an area with vulnerable user collision rates and KSI collisions comfortably below the Borough average. Even so, it is clear from the Crashmap Pro Portal map within the ASGF that the intersection has a cluster of accidents, whilst the number of collisions may be below the Borough average this does not justify a development which is intended to attract attention.
19. The location of the proposed advertisement has the potential to distract drivers' attention away from a heavily trafficked intersection where road users should use high levels of concentration to navigate.
20. The proposed advertisement is located facing a busy intersection, whilst the proposed advertisement would not obstruct any traffic signals or signs and the level of illumination and times of illumination have reduced from the previous proposal, the advertisement would be prominent. I find that the proposed advertisement would constitute a source of distraction to motorists, to such a degree that there would be a detrimental effect on public safety.

⁴ Paragraph: 067 Reference ID: 18b-067-20140306

21. I have taken into account Policies T2 and T4 of the London Plan; and Policies P43 and P50 of the Southwark Plan in so far as they seek developments not to harm public safety. Given I have concluded that the proposal would harm public safety, the proposal conflicts with these policies.
22. The proposal would also be contrary to the Framework which seeks to ensure advertisements are subject to control in the interests of public safety.

Conclusion

23. Whilst I have found no harm to amenity, this does not outweigh the harm I have found in relation to public safety. The appellant has confirmed that a blank shroud would be erected by the contractor for the duration of the works should the appeal be dismissed. Whilst it would be visually preferable to have a shroud which contained a reproduction of the buildings, this would not outweigh the harm I have identified in terms of public safety.
24. The appeal is dismissed, and express consent is refused for the display of one externally illuminated advertisement sign (6.81m x 6.41m) at 20-25 Camberwell Green within temporary scaffolding shroud, incorporating a 1:1 facsimile of the building and its architectural features printed on it.

Chris Pipe

INSPECTOR