

Neighbourhoods, Regeneration and SustainabilityGlasgow City Council
Exchange House
231 George Street
Glasgow
G1 1RX

21 January 2022

Dear Sir / Madam

**APPLICATION FOR LISTED BUILDING CONSENT FOR THE PROPOSED INSTALLATION OF
REPLACEMENT DIGITAL POSTER DISPLAY BOARDS AT KING'S THEATRE, 297 BATH STREET,
GLASGOW, G2 4JN****ON BEHALF OF THE AMBASSADOR THEATRE GROUP****ONLINE REFERENCE NUMBER: 100507200-002**

Montagu Evans LLP act on behalf of the Ambassador Theatre Group ('the ATG'). On behalf of our client we hereby submit an application for listed building consent for the proposed "*installation of replacement digital poster display boards*" at King's Theatre, 297 Bath Street, Glasgow, G2 4JN ('the site').

The King's Theatre is Category A-listed (Historic Environment Scotland reference [LB32963](#)) and opened in September 1904. The Theatre has its principal elevation to Bath Street, with a second façade fronting Elmbank Street. The Theatre is under the ownership of Glasgow City Council and currently managed by the ATG.

The application for listed building consent has been submitted to Glasgow City Council ('GCC') today via the Scottish Government ePlanning portal (online reference number 100507200-002). Associated applications for planning permission and advertisement consent have also been submitted today for consideration (online reference numbers 100507200-001 and 100507200-003 respectively).

APPLICATION FOR LISTED BUILDING CONSENT

This application for listed building consent is comprised of the following information:-

- Completed ePlanning application form;
- Covering letter and supporting statement prepared by Montagu Evans LLP (i.e. this letter);
- Letters of support for the proposals from Theatres Trust and Glasgow Chamber of Commerce;
- Digital display screen visuals generic information document prepared by GH Digital Print;
- Technical guidance on the proposed digital screens to be used; and
- Copies of the following drawings:-

DRAWING TITLE	DRAWING NUMBER	SIZE
Location Plan	-	A4 @ 1:1250
Elmbank and Bath Street Elevations External Illuminated Billboards as Existing	PP/LBC-001	A1 @ 1:100

Elmbank and Bath Street Elevations External Illuminated Billboards as Proposed	PP/LBC-002	A1 @ 1:100
---	------------	------------

CURRENT ADVERTISING CHALLENGES

The King's Theatre has always advertised current and future productions through the use of large scale and illuminated signage. At present there are six existing poster display boards at the King's Theatre, which includes four boards located on the Bath Street elevation of the Theatre, one board on the Elmbank Street elevation and a sixth double poster board that wraps around the corner of the Theatre.

The four boards located on the Bath Street elevation and the single board on the Elmbank Street elevation are the subject of this application. The poster boards are approximately 1540 mm high x 810 mm wide and are back lit frames that hold paper posters.

At present the current poster board arrangements are impractical to the ATG and fail to provide a workable solution that meets their advertisement needs. There are substantial challenges encountered each time there is a need to change the content of the existing poster boards, and there is a significant level of risk involved when changing the paper posters by hand for both ATG staff and passing members of the public. The current poster boards can only be changed by specialised, manual handling trained staff and the poster changeover process currently takes on average between three and four hours. The topography adjacent to the King's Theatre is varied, and at their tallest points, the tops of the existing poster display boards can be over 10 feet from the pavement. The changeover process therefore involves the uses of ladders on a sloping site, which have to be erected in the public footway. In addition, the existing poster boards have to be swung outwards to be changed, which means that the changeover process cannot be undertaken in windy conditions. As Bath Street is a key route both into and out of the city centre, the current process presents a health and safety risk to both ATG staff, as well as passing pedestrians and members of the public.

As a result, the ATG do not have the full capability to effectively publicise performances or forthcoming shows, and often opportunities to advertise smaller scale productions are missed, due to the timings, costs and impracticalities associated with changing the content of the existing poster display boards. Ultimately, this has a detrimental effect on tickets sales and bookings, and the overall performance of the Theatre. When compared to a large number of the other Theatres operated by the ATG across the country, the King's Theatre is currently considered to be at a significant disadvantage.

The successful operation of the King's Theatre is directly linked to its ability to promote the productions held at the Theatre. However, the current paper poster displays are not considered to be of a sufficient quality that meets the needs of the ATG. The paper posters can often snag and wrinkle, and water can enter the current poster board frames and cause further damage. This is a point of frustration for the ATG, as well as for producers and event organisers, as there is a significant cost attributed to producing the large format posters held within the display boards. The costs that are associated with producing, printing and shipping the large format posters often means that smaller productions cannot afford to advertise their performances, which has a negative impact on the ATG's potential to generate revenue and ticket sales. This also has an adverse impact on visitors to the Theatre, who are often unable to see the shows they are coming to experience advertised at the King's. In addition, there is also a substantial amount of paper wastage attributed with the existing poster display boards and the ATG have been advised that the quantity of paper and cardboard stored within the Theatre is a fire safety concern.

With increasing health and safety concerns in relation to the current poster display boards, and the heightened expectations of modern audiences and commercial promoters, it is considered that there is a real opportunity to improve

the operation, and quality, of the existing display boards by installing digital display screens, whilst respecting the character of the listed building and its surrounding context.

PROPOSED DEVELOPMENT

In order to enhance the ability of the ATG to successfully advertise and promote performances and events that are held at the King's Theatre, listed building consent is sought to replace the five existing poster display boards with digital poster display boards. The proposed development will include the removal of the existing poster display boards.

In order to minimise the visual impact of changing to a digital advertising format, the proposed digital display screens will be almost identical in size to the existing boards (1540 mm high x 810 mm wide x 100 mm depth) and will have a black finished aluminium frame and a toughened safety glass front. When installed, the digital display screens will utilise the fixing points of the current poster boards where possible to minimise any damage to the listed building.

It is intended that the digital display screens will function in a similar way to the existing poster boards. The digital screens will display static posters, with no moving or flashing content, and there will be no slow dissolve between posters. The posters will be displayed for fixed periods of time and will exclusively advertise performances to be held the King's Theatre. The ATG are agreeable to Glasgow City Council imposing a reasonable time limit on the frequency of poster changes permitted, but would request that multiple changes per day are allowed, in order to maximise the unique opportunity that the move to digital poster display boards will offer the ATG to enhance their advertisement abilities.

The digital screens will be operated, controlled and managed by the ATG, with the content self-generated. The digital screens will not be used for third party commercial advertisements.

POLICY CONSIDERATIONS

Section 25 of the Town and Country Planning (Scotland) Act 1997, as amended, requires all planning applications to be determined in accordance with the Development Plan for a site, unless material considerations indicate otherwise. The Development Plan for the site is the Glasgow and Clyde Valley Strategic Development Plan ('ClydePlan'), which was approved by Scottish Ministers on 24 July 2017 and the Glasgow City Development Plan ('CDP'), which was adopted in March 2017.

The Planning (Listed Building and Conservation Areas) (Scotland) Act 1997, states that no person can carry out or arrange any work to alter a listed building in any way which would affect its character as a building of special architectural or historic interest, unless the work is authorised by the Local Planning Authority.

CYLDEPLAN

Glasgow city centre is stated as being the core of the ClydePlan region and that it is its "*principal economic and cultural global asset*". Glasgow city centre is considered to be the primary location within the region for commercial, leisure and visitor uses serving the whole city region, as well as being a regional and national transport hub. The ClydePlan therefore supports development in principle that enhances the role of Glasgow city centre as the key employment and cultural core of the city region.

GLASGOW CITY COUNCIL DEVELOPMENT PLAN

A strategic outcome of the CDP is ensuring that Glasgow is a "*vibrant place with a growing economy*".

Policy CDP 1 relates to the **Placemaking Principle** and states that new development in Glasgow should aspire to achieve the six qualities of place as defined in Scottish Planning Policy, which is reinforced by the Creating Places and Designing Streets guidance. The Council will expect new development to be design-led, to contribute towards making the city a

better and healthier environment to live in, and that development should aspire towards the highest standards of design whilst protecting the city's heritage. In principle, Policy CDP 1 seeks to:-

- Make Glasgow "*an appealing place to live, work and visit*"; and
- Respect the historic environment "*by responding to its qualities and character and encouraging their appropriate use*".

Policy CDP 3 relates to **Economic Development**. In order to ensure that Glasgow's economy continues to grow, the Policy highlights the need to focus on development that is related to tourism and events to build on the city's reputation as a key short stay and business destination, as well as a city that can host major international events. A priority of the Policy is to maintain the attractiveness of the city centre as an investment location. Part 3 a) of Policy CDP 3 states that it will ensure Glasgow's town centres are vibrant places to live and work by "*reinforcing the role of the city centre as the primary location for retail, employment, leisure, tourism and evening economy uses*".

Policy CDP 9 The Historic Environment seeks to ensure the appropriate protection, enhancement and management of Glasgow's heritage assets by protecting, conserving and enhancing the historic environment for the benefit of existing and future generations.

The ATG make an important financial contribution to the economy of Glasgow. Together with the Theatre Royal at 282 Hope Street, excluding ticket sales, it is estimated that the Theatres contribute in the region of £17 million to the local economy of Glasgow, as visitors to the Theatres make use of city's hotels, restaurants, bars and transport providers. The King's Theatre also makes a significant contribution to Glasgow in terms of arts and culture, as well as to the vibrancy of the city, as it attracts a range of people to the city to experience the productions and events that it hosts.

The scale of the proposed digital display boards has been selected so that they can be installed within the area currently occupied by the poster boards. It is considered that this will ensure that the upgrading of the poster boards to the digital display format is a subtle and sensitive intervention for the King's Theatre, which will minimise the visual impact in respect of any changes to Theatre's façades. As the digital screens will be set within the existing poster board areas, the proposed digital displays will not obscure any special features of architectural interest detailed in the Category A-listing of the King's and any damage to the historic fabric of the Theatre will be minimised, as the existing poster board fixing points will be utilised during installation where possible.

The CDP states that the city centre is the primary location for leisure, tourism and evening economy uses in Glasgow. Given the city centre location of the King's Theatre, the surrounding area is predominantly commercial in nature, with a range of uses including hotels, offices, and food and drink establishments. As the King's Theatre is located in a predominantly commercial area, and the proposed digital display screens will have the same function as the existing illuminated poster boards, it is considered that there will be no adverse impact on neighbouring amenity. In addition, it is not considered that the installation of the replacement digital display screens has the potential to impact road users, interfere with visibility or cause any hazard as a result of their design or function. As noted above, the ATG will display static posters in the display screens and are agreeable to discussing the frequency of poster changes permitted with the Council, as well as the illumination levels of the screens. Given that the replacement digital display screens will be fixed to the King's Theatre, in the exact same locations as the existing poster boards, it is not considered that the digital screens will cause any obstruction to the public footway, nor will they obscure any existing road signs.

The proposed digital display screens will directly relate the ongoing operation of the King's Theatre. As a Theatre, the ability to market and advertise the shows and performances to be held there effectively, in order to keep up with other

such venues in Glasgow and across the country, is a key requirement to the continued success of the premises. The digital display screens will be set within the established areas of existing illuminated adverts in the city centre, and as such, it is considered that any changes in the perceived scale or appearance as a result of the move to the digital boards will be minimal. It is submitted that the digital signage will have a limited impact on the streetscape and that it is an appropriate intervention for the King's Theatre when viewed within the surrounding city centre context of the site.

As the country recovers from the effects of the Covid-19 pandemic, which has disproportionately impacted city centres, the digital display screens will not only support the function of the King's as a Theatre of national importance, but in enhancing the ATG's ability to advertise performances, will also contribute to the ongoing vitality and viability of Glasgow city centre. The introduction of the digital screens is considered to be a more modern and efficient solution for the Theatre, which can assist in promoting the positive benefits of Glasgow's cultural scene, whilst helping to maintain the vibrancy the historic venue, without compromising its heritage context or any specific features of the listed building.

The simple design of the replacement digital display screens will conserve the character of, and will not detract from the appearance of the King's Theatre, and by way of their function and higher quality of design, can contribute to the continued growth of Glasgow's city centre economy. As such, the proposals are considered to be in accordance with Policies CDP 1, CDP 3 and CDP 9 of the City Development Plan.

MATERIAL CONSIDERATIONS

SG1 – THE PLACEMAKING PRINCIPLE (PART 2) SUPPLEMENTARY GUIDANCE ('SG1')

SG1 supports CDP Policy CDP 1. Part 8 of the SG1 relates to Signs and Advertising and states that in determining the acceptability of an advertisement display, each case will be assessed against its impact on:-

- Visual Amenity. To ensure that the visual amenity of an advertising site or the surrounding area is not adversely affected the SG1 requires proposed to align with criteria a to f as stated below. In relation to each of the criterion, we would comment as follows:-

- a. *"all advertising signs should be of high quality materials. The Council will welcome innovative design and will look for the improvement of existing authorised signs where the opportunity arises;*

The proposed digital display screens are considered to be a higher quality design solution for the King's Theatre, and an opportunity to improve the advertisement potential of the site, in comparison to the existing paper poster boards.

- b. *the Council will resist the accumulation of advertising clutter;*

The replacement digital display screens will be installed within the areas currently occupied by the paper poster boards, which will minimise the visual impact of any change to the Theatre's facades. It is therefore considered that there will be no accumulation of advertising clutter as a result of the proposals.

- c. *all advertising on premises should be seen as part of the overall design of the property and should respect its original design, not appear as an addition;*

The scale of the proposed digital poster display boards has been selected to ensure that they fit within the area occupied by the current poster displays. It is submitted that this will ensure the

upgrading of the poster boards to the digital display screens will be a subtle and sensitive intervention, which will limit the impact of any change in respect of any the appearance of Theatre's facades, as well as any damage to the historic fabric of Theatre, whilst maximising the potential of the ATG to attract visitors and advertise performances.

- d. *consent will be resisted for directional signs remote from the curtilage of the premises to which they relate;*

Criterion d is not considered to be relevant to this submission as the proposals are not for directional signs remote from the curtilage of the premises to which they relate. The proposed digital poster display boards will be fixed to the building and will clearly relate to the site's function as a Theatre.

- e. *on listed buildings, and within conservation areas, a higher quality of design and materials will be expected to reflect the property or area's character and appearance (signage should complement the original architectural style and features of the building); and*

As noted under criterion b and c above the submitted proposals have been pursued by the ATG to respect the character and appearance of the listed building.

- f. *any original or historically significant signage should be retained and incorporated into refurbishment, where possible".*

Criterion f is not considered to be applicable to this submission as the poster display boards to be replaced are not original or historically significant. It is considered that the digital poster display boards proposed are a higher quality solution for the King's Theatre.

- Public Safety. To ensure that public safety is not adversely affected, SG1 states that criteria a to e below will be taken into account when the Council assess proposals:-

- a. *"proximity to traffic signals; Colours and level of luminance should not interfere or cause distraction to road and cycleway users in the vicinity of signals;*
- b. *proximity to other hazards on the road where the advertising sign may interfere with visibility or cause driver/cyclist distraction e.g. junctions, queuing traffic and pedestrian crossing points, the approach to traffic signal controlled junctions;*
- c. *cumulative impact relative to existing signage, including road signs;*
- d. *proximity to a roundabout or complex priority junction; and*
- e. *the potential obstruction of paths and cycleways, including headroom (advertising signs adjacent to any pedestrian and/or cycle route should be displayed at least 2.5m above ground level)".*

It is not considered that the installation of the replacement digital poster display boards proposed by this application have the potential to impact road users, interfere with visibility or cause any hazard as a result of their design, function or level of illumination. Given that the digital poster display boards will be fixed to the Theatre, in the same locations as the existing poster display boards, the signage will not cause any potential obstruction in the footpath adjacent to the Theatre and will not obscure any existing road signs on Bath Street or Elmbank Street.

SG1 also provides guidance in relation to digital advertisement displays and states that the following standards will apply to internally illuminated display screens:-

- a) *"They will only be permitted where they do not contain moving or flashing content, particularly where they are considered to have a potentially significant adverse impact on pedestrian and vehicular traffic safety;*
- b) *They must not use a slow dissolve between advertisements;*
- c) *They will only be permitted in areas which are already busy commercial areas and;*
- d) *The cumulative effect of such advertisements will be taken into account in assessing the impact on amenity and public safety".*

SG1 states that *"there may be locations where small format outdoor displays are appropriate, such as in shopping areas. However, such displays will need to be in keeping with the design and layout of the public realm and ensure that impact on the character of the area and on pedestrian safety is not compromised"*.

The digital poster display boards proposed will directly relate to the function of the King's Theatre. The King's Theatre is located within the city centre, which is by its very nature, a busy commercial area. The King's Theatre is located adjacent to predominantly commercial uses including hotels, offices, and bars, particularly at ground floor levels. It is therefore considered that the proposals will not have adverse impact on amenity and that the digital poster display boards are appropriate to the city centre context of the site.

SG9 HISTORIC ENVIRONMENT SUPPLEMENTARY PLANNING GUIDANCE ('SG9')

SG9 supports and provides further detailed guidance in relation to Policy CDP 9: The Historic Environment and states that all works to listed buildings must be carried out in a way that protect their character as buildings of special architectural and historic interest.

As previously noted the installation of the replacement digital poster display boards will be restricted to the areas currently occupied by the existing poster boards, which will seek to minimise any adverse impact to listed Theatre, in line with SG9. As detailed in the material submitted in support of this application, the digital poster display boards will be sensitively installed to minimise any damage to the listed building and will not result in the loss of any historic fabric.

SUMMARY

It is considered that the *"installation of replacement digital poster display boards"* at King's Theatre, 297 Bath Street, Glasgow, G2 4JN proposed by this application for listed building consent is in accordance with, and can draw support from, the provisions of the Development Plan for the site. The proposals are considered to be a higher quality design solution for the King's Theatre and will contribute towards Glasgow becoming a more sustainable city, with less unnecessary paper wastage. The proposals have been considered in the respect of the listed nature of the King's Theatre and are considered to be a subtle, and sensitive, intervention for the site.

We trust that the above and attached are satisfactory and that you are in a position to register and progress the application. We will await formal confirmation in this respect. It is our intention to further discuss the application for listed building consent, as well as the associated applications for planning permission and advertisement consent, with the Council in due course and as required, we would be happy to meet with you on site to discuss the application further.



If you should require any further information, please do not hesitate to contact Craig Wallace [REDACTED]

[REDACTED] or Rachel Mushet ([REDACTED]) of this office direct.

Yours faithfully,

[REDACTED]

MONTAGU EVANS LLP

On behalf of the Ambassador Theatre Group