

23 August 2023

Laura Dorbeck
Planning and Regeneration
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WC1H 9JE

Dear Laura

**University College London Institute of Education, 20 Bedford Way, WC1H 0AL
Advertisement Consent for the installation of new signage (Planning Portal reference: PP-12127981)**

On behalf of our client University College London ('UCL' or the 'Applicant'), we hereby submit to the London Borough of Camden (the 'Council') an application for Advertisement Consent under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 for the display of non-illuminated signs on the Level 3 and 4 entrances of the UCL Institute of Education ('IoE'). The Application seeks advertisement consent for:

"Display of non-illuminated signs displaying UCL branding at the Bedford Way and Thornhaugh Mews entrances of the UCL Institute of Education".

This letter sets out the background to the proposed signage scheme, provides a summary of the proposals and sets out the planning policy context and assessment.

Site Location

The building is Grade II* listed (listing reference 1246932) and is located within the Bloomsbury Conservation Area (Sub-area 3: 'University of London/British Museum'). The IoE was design by Architect Sir Denys Lasdun and Partners and completed in 1977. It is divided into three addresses, 17 Bedford Way (occupied by the Institute for Advanced Legal Studies), 20 Bedford Way (occupied by UCL's Institute of

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Education) and 26 Bedford Way (occupied by UCL Psychology and Language Sciences). It is located in the wider UCL Bloomsbury Campus on Bedford Way in the London of Camden.

It is bounded to the north by Gordon Square, to the east by Bedford Way and the Royal National Hotel, to the south by Russell Square and to the west by Woburn Square and the School of Oriental and African Studies (SOAS), another Lasdun design building. Nearby are a number of listed buildings, including numbers 21-24 Russell Square (Grade II) to the southwest, numbers 10-16 Woburn Square (Grade II) to the west, and numbers 55-59 Gordon Square (Grade II) to the northwest.

The proposed signs are located at the Level 3 entrance facing Bedford Way and the Level 4 entrance facing Thornhaugh Square. Figure 1 shows these two locations on plan. The entrances have been subject to improvements as part of approved Phase 2C works in the refurbishment of the IoE (ref. 2021/6235/P and 2021/6242/L).

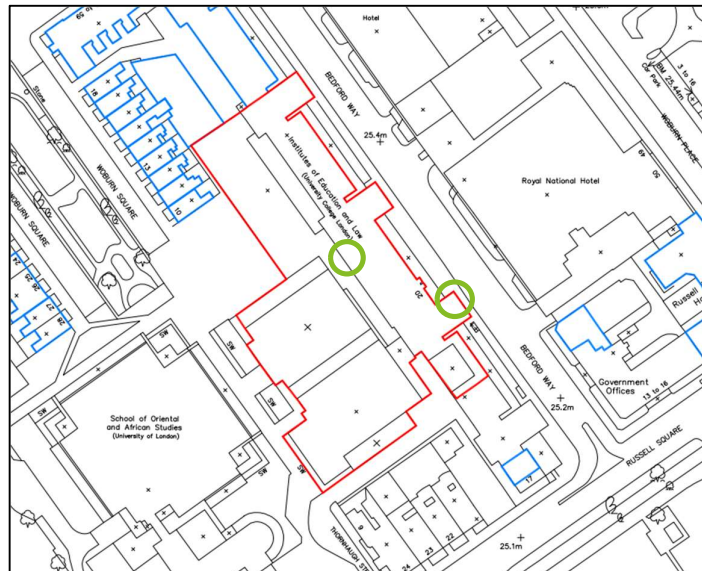


Figure 1 - Location of signage

Background

The IoE comprises a large building of circa 27,000 sqm of F1(a) (higher education) and associated ancillary floorspace and is Grade II* listed. This building has been subject to numerous planning and listed building consent applications in recent years as part of a phased masterplan to update its facilities. Pursuant to the roll out of the masterplan, the works to the building, as well as major internal refurbishment and reconfiguration, also include upgrades to services to ensure the building provides adequate spaces for learning and teaching.

This application is for advertisement consent to display signage at the entrances of the IoE. These are part of continuing efforts to refurbish the building to ensure that a high-quality environment is delivered for the future users of the building, including students and staff. As part of the Phase 2C works (ref. 2021/6235/P and 2021/6242/L), new entrances were delivered at Level 3 and 4 to improve access for users of the

building. The proposed signs will contribute to the presence of the entrances and will help with signposting and wayfinding. As all the proposed signage will be vinyl with no additional fixings, Listed Building Consent is not required as it is reversible. This has been agreed with the conservation officer at the Council. However, consideration of heritage impact in planning policy terms is needed and is therefore assessed in this application.

Proposals

Table 1 sets out the proposed fascia signs and manifestations (vinyl lettering and UCL insignia) to be in place until April 2028. Further details are provided on the accompanying plans and drawings. None of the signs will be illuminated and there will be no projection. The proposed methodology for the installation and removal of the vinyl signs is set out in Appendix A. The manifestation vinyl signs are applied to the glazing internally, while the fascia signs use external grade vinyl which is suitable for use outdoors.

To allow completion of the application form, we have stated the advertisements will be in place for ten years but in reality, they will be permanent. However, we are unable to set this out on the application forms.

Table 1 - Proposed Manifestations

Advert	Maximum height from the ground to the base of the advertisement (mm)	Dimensions of proposed sign (mm)	Maximum height of individual letters/symbols (mm)	Materials	Colour
<i>Level 3 – Bedford Way Entrance</i>					
Fascia Signs 1, 3 & 5	3720	Height: 185 Length: 1880 Depth: 1	185	External grade Vinyl	Antique White (RAL9001)
Fascia Signs 2, 4 & 6	3360	Height: 290 Length: 1052 Depth: 1	290	External grade Vinyl	Antique White (RAL9001)
Manifestations 1, 2, 3 & 4	1300	Height: 280 Length: 810 Depth: 1	65	Vinyl	White
Manifestations 5 & 8	1440	Height: 440 Length: 1995 Depth: 1	225	Vinyl	White / Orange
Manifestations 6 & 9	1440	Height: 295 Length: 2065 Depth: 1	295	Vinyl	UCL Logo: White background with clear text
<i>Level 4 – Thornhaugh Mews Entrance</i>					
Manifestation 7	1000	Height: 600 Length: 1810 Depth: 1	145	Vinyl	White

Planning Policy Considerations

This section of the letter sets out the key legislative and planning considerations for the proposal.

Relevant Planning Policy Documents

- National Planning Policy Framework (2021)
- The London Plan (2021)
- Camden Local Plan (2017)
- Bloomsbury Conservation Area Appraisal and Management Strategy (2011)
- Camden Planning Guidance: Design (2019)

The London Borough of Camden has conducted initial engagement on its Draft Local Plan. This consultation sought to identify key issues for the Plan moving forward. Given the early stage in the production of the new Local Plan, the consultation carries limited weight in the decision-making process.

Legislative Requirements

Schedule 2 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 requires all advertisements to be installed subject to the following conditions:

- *“no advertisement is to be displayed without the permission of the owner of the site on which they are displayed (this includes the highway authority, if the sign is to be placed on highway land);*
- *no advertisement is to be displayed which would obscure, or hinder the interpretation of, official road, rail, waterway or aircraft signs, or otherwise make hazardous the use of these types of transport;*
- *any advertisement must be maintained in a condition that does not impair the visual amenity of the site;*
- *any advertisement hoarding or structure is to be kept in a condition which does not endanger the public; and*
- *if an advertisement is required to be removed, the site must be left in a condition that does not endanger the public or impair visual amenity.”*

Design and Heritage Policies

London Plan Policy HC1 ‘*Heritage conservation and growth*’ states that development proposals impacting heritage assets should be sensitive to preserve and enhance their significance, mitigating any potentially harmful effects.

Camden Local Plan Policy D1 ‘*Design*’ seeks to ensure that development proposals meet the highest standards of design, sustainability, respect local context and character, and resist development that would cause harm to any listed building or Conservation Area.

Camden Local Plan Policy D2 ‘*Heritage*’ maintains the need to protect and preserve Camden’s heritage assets through developments of high-quality design that respects the local context and character. It

recognises the need to consider the relative weight of public benefits when assessing development proposals which results in substantial harm to listed buildings. It emphasises that the Council will resist any alterations or extensions which would cause harm to the special architectural and historic interest of a listed building.

Applicant's Response

The signs meet the five standard conditions as set out under Schedule 2 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 as the signs blend into the existing entrance and do not impact the visual amenity of the entrance and wider building. The signs do not protrude and are not illuminated. Therefore, they do not impact public safety.

It is considered that the advertisement will not adversely affect the street scene or harm the character or appearance of the Bloomsbury Conservation Area or the Grade II* listed IoE building. The chosen colours and designs are simple and modern. The signs are at a scale that is appropriate to their location. They allow the entrance and building to be identified easily by visitors and aid wayfinding. It is not considered that the signs impact the heritage significance of the building due to their design, scale and lack of fixings. Given that they are vinyl, the signs are fully reversible. The proposed methodology for the installation and removal of the signs, set out in Appendix A, demonstrates that the vinyl is fully reversible and no fixings are required. The vinyl will cause no impact to the building.

As such, the advertisements are in accordance with Advertisement Regulations and the Development Plan policies outlined above and should therefore be granted permission.

Content of Application

The accompanying information prepared by Architon has been submitted in support of this application for advertisement consent:

- Location Plan (ref. 3147-P6-2001-P1)
- Site Plan (ref. 3147-P6-2002-P2)
- Floorplans (ref. 3147-P6-2305-P3 and 3147-P6-2405-P5)
- Existing Elevation Drawings (ref. 3147-P6-2306-P2 and 3147-P6-2406-P1)
- Proposed Elevation Drawings (ref. 3147-P6-2307-P8, 3147-P6-2308-P2 and 3147-P6-2407-P5)
- Proposed Signage Detailed Elevations (ref. 3147-P6-2003-P2)

In addition to the above documentation, the £196.00 advertisement consent application fee and service charge (inc VAT) has been paid via Planning Portal.

Conclusion

In conclusion, the proposed advertisements will be of high quality and have been designed with the surrounding context in mind.

The signage proposals have been designed to minimise the impact on the setting of the IoE and the wider Conservation Area. In particular, none of the proposed signs are illuminated. Therefore, the proposals accord with the relevant Local Plan policies.

I would be grateful if you could confirm when this application has been registered. In the meantime, if you require any further information or wish to discuss this application further, please contact Alice Young-Lee (020 7303 4778 / alicesyounglee@deloitte.co.uk).

Yours sincerely

Deloitte LLP

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Appendix A

Installation of CAD-Cut vinyl manifestation to Levels 3 and 4

Preparation:

- 1) Clean area using clean water with trace amount of baby shampoo (Ph Neutral solution).
- 2) Take off stubborn dirt with a new, clean blade and re-clean.

Installation:

- 1) Soak window with clean water with trace amount of baby shampoo.
- 2) Apply self-adhesive vinyl film to window. Press water solution from under the film using a plastic soft squeegee.
- 3) Allow to dry.
- 4) Remove application tape from face of film.
- 5) Clean surrounding glass.

Removal at end of requirement:

- 1) Using a non-abrasive instrument, such as a fingernail or the tip of a soft squeegee, catch a corner of the vinyl.
- 2) Once the vinyl starts to come away. Pull back at a steady pace to minimise the amount of glue left behind.
- 3) Once decals are removed, clean using clean water with trace amount of baby shampoo and a new, clean blade.”