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**University College London, Gower Street, London, WC1E 6BT
Town and Country Planning Act 1990 (as amended)
Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended)
Application for Listed Building Consent and Advertisement Consent**

We write on behalf of our client, University College London ('UCL') (the 'Applicant') to submit an application for Listed Building Consent and Advertisement Consent for the display of two non-illuminated signs on the railings either side of the Main Quad on Gower Street, London, WC1E 6BT (the 'Site').

Listed Building Consent and Advertisement Consent is sought for the following:

"Display of 2 x non-illuminated signs on the railings of the west entrance to the Main Quad at University College London fronting Gower Street."

Site

The Site is situated at the entrance to the west of the Main Quad outside of University College London facing onto Gower Street. The Site is situated in the Bloomsbury Conservation Area. The railings form part of the boundary of the main campus of University College London, and which is included in the first and primary listing relating to "University College (University of London) and attached railings to north and south wings". This entry was made at Grade I on 10 June 1954. Within the Main Quad resides the Grade II listed observatories. Additionally, directly opposite lies the UCL Cruciform Building which is Grade II listed, as well as Grade II listed University College Hospital, situated to the north west.

Background

UCL's Bloomsbury campus main entry points at Gower Street and Malet Place have for a long time lacked signage to let students, the public and visitors know they are arriving at UCL. The branding across Bloomsbury has been reviewed with the purpose to create a welcoming experience for staff, students and visitors

UCL's Branding Team focused on creating appropriate signage for the main entrance areas to link different parts of the university. A key factor was to ensure the brand experience is consistent across all locations, with the designs prepared for UCL East reflected in those at UCL Bloomsbury and other locations. With important events coming up, including the bicentennial in 2026, some solutions were identified in the short-term that could be refreshed with similar, appropriate signage.

One of the main considerations in each case was to respect and work with the architectural style of the buildings and to create a solution that is prominent enough, but in-keeping with the surroundings. Signage designs are expected to follow a similar format in regards to fonts, text, dimensions when refreshed and updated in future.

Planning History

A planning history search has been undertaken using Camden Council's online planning register. The search identifies that the Site has a limited planning history.

An advertisement consent application (ref. 2009/3351/A) was granted on 5 October 2009 for the:

"Display of two internally illuminated freestanding totem signs (2.3m x 0.5 m x 0.08m) at the entrance to University College, in association with the UCL Campus Wayfinding Scheme."

Proposals

The proposals relate to two signs which have been installed on the railing either side of the Main Quad entrance. The signs measure 2,000 x 1,000mm and are made of rigid dibond. They are fixed to the gates by a clamping fixing solution.

The signs contain the UCL logo as well as some short text stating 'Welcome to the University of the Year 2024'. It is expected that the text on the signs will change at the end of 2024 and similar, discreet text relating to the university will be displayed. The size, material, location and fixing of the signs will remain in line with the submitted proposals.

The proposed signage is shown on the submitted drawings, prepared by UCL.

Planning Policy Considerations

Regulation 3 of The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 requires that local planning authorities control the display of advertisements only in the interests of amenity and public safety, taking into account the provisions of the Development Plan, in so far as they are material, and any other relevant factors.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Statutory Development Plan unless material considerations indicate otherwise.

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 places a duty upon the Local Planning Authority to determine applications affecting listed buildings and pay special regard to the desirability of preserving the building or its setting.

Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 places a duty upon the Local Planning Authority when considering proposals for development within Conservation Areas to give special attention to the desirability of preserving or enhancing the character or appearance of that area.

The Statutory Development Plan is comprised of the London Plan (2021) and the Camden Local Plan (2017).

The following planning policy documents are also material considerations:

- National Planning Policy Framework (NPPF) (2023)
- Camden Planning Guidance: Advertisements (2018)

The Government has recently published consultation on an updated draft of the NPPF, which is open for consultation until 24 September 2024. No changes are proposed to the text of Chapter 16, Conserving and Enhancing the Historic Environment.

Camden is in the process of preparing a new local plan which aims to set out the Council's vision for future development in Camden for the next 15 years. The draft local plan was subject to a Regulation 18 consultation in early 2024, with target adoption due in Summer 2026. Due to the progress of the draft local plan, at this stage limited weight is given to the draft policies when assessing the proposals.

As the proposals affect a building within a Conservation Area, consideration has been given to Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Planning Policy Assessment

Section 16 of the Planning (Listed Building and Conservation Areas) Act 1990 ('the Act') states that in considering whether to grant Listed Building Consent, the authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. Section 66 of the same Act provides the same general duty in respect of applications for planning permission.

Paragraph 200 of the National Planning Policy Framework (NPPF) states that "in determining planning applications, local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting the viable uses consistent with their conservation.

Paragraph 208 of the NPPF sets out where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use

Policy HC1 of the London Plan and Policy D2 of the Camden Local Plan seek to conserve the significance of heritage assets and their surroundings.

Policy D1 of Camden's Local Plan sets out that the Council will seek to secure high quality design in development and requires that development respects local context and character.

Policy D4 of the Camden Local Plan requires advertisements to preserve or enhance the character of their setting and host building by respecting the form, fabric, design and scale of their setting and host building and be of the highest standard of design, material and detail.

Policy D4 also states that advertisements should not contribute to an unsightly proliferation of signage in the area; contribute to street clutter in the public realm; cause light pollution to nearby residential properties or wildlife habitats; have flashing illuminated elements; or impact upon public safety.

The application seeks consent for two signs installed on the railings of the main entrance of the Main Quad. The proposals have been sensitively designed in terms of their size and location. Consideration has also been given to their impact on the railings, which they are installed, local context, street-scene and wider townscape. The design and colouring of the lettering is minimal and is in keeping with UCL branding across the Campus. The signage is not considered to obscure or hinder the ready interpretation of any traffic, or the safety of persons using any highways.

Furthermore, an advertisement consent application (ref. 2009/3351/A) was granted on 5 October 2009 for "Display of two internally illuminated freestanding totem signs (2.3m x 0.5 m x 0.08m) at the entrance to UCL, in association with the UCL Campus Wayfinding Scheme". Although this wayfinding signage was not directly on the railings, they are just outside them and fall within the same curtilage of the Main Quad. This permission establishes the principles of signage at the entrance of Site, which is broadly comparable with these proposals.

It is considered that the advertisements would be in keeping with the character of the surrounding area and will allow the Applicant to successfully advertise the building and their university in a discreet manner with no impact on public safety or neighbouring amenity. As a result, the proposals are in accordance with Regulation 3 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

Furthermore, the proposed signage is sensitive to the character and appearance of the Main Quad and the wider area. The proposals are therefore considered to have a neutral impact on the wider conservation area.

On the basis of the above, the proposed signage complies with Policies D1, D2 and D4 of the Local Plan, Camden Planning Guidance: Advertisements, London Plan 2021 and the NPPF 2023, and as such, express consent for the display of an advertisement should be granted accordingly.

To assess the full impact of the proposals on the significance of the Grade I listed site and surrounding Bloomsbury Conservation Area, a Heritage Assessment has been prepared by Gerald Eve LLP and has been submitted (and appended to this covering letter) as part of this application for the Council's consideration.

In summary, the proposals are very minor in nature and would preserve the significance of the Grade I listed site. Should the Council consider the proposed works to cause any degree of 'less than substantial harm' to the building, we would highlight the wider benefits to education arising from the proposals.

Overall, the proposals are considered to preserve the significance of the Grade I listed site and the character and appearance of the Bloomsbury Conservation Area. Therefore, the proposals are considered to be in accordance with Policies D1 and D2 of Camden's Local Plan, as well as the relevant NPPF paragraphs relating to the historic environment.

Application Documentation

In accordance with the London Borough of Camden's validation requirements, the following documents have been submitted via the Planning Portal, alongside this cover letter:

- Application form;
- Site Location Plan; and
- Drawings/Pack, prepared by UCL.

The requisite application fee of £165 (Plus a Planning Portal admin fee of £70) has been paid online via the Planning Portal at the time of submission.

Please do not hesitate to contact Lucy Hale (+44 747 166 4280) or Ben Gibbs (+44 742 547 7724), of this office should you have any questions or concerns. We look forward to receiving notice of your receipt and validation

Yours faithfully,



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