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Mr Peres Da Costa  
Planning Department  
Camden Council  
5 Pancras Square  
London  
NC1 4AG

Reference	UCLH Phase 4
Direct line	0207 399 5850
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10 July 2020

Dear Mr Peres Da Costa

#### **CONSENT TO DISPLAY ADVERTISEMENT**

#### **UCLH PHASE 4 - GRAFTON WAY BUILDING**

We write on behalf of our client, University London College Hospitals NHS Trust (UCLH), to submit an application for Advertisement Consent to display external signage in connection with the UCLH Phase 4 Proton Beam Therapy Treatment Centre, located on Grafton Way WC1E 6DB.

In line with the London Borough of Camden's ('LBC') requirements, this application comprises the following:

- Covering Letter;
- Site Location Plan (at scale 1:1250)
- External Signage Report (including proposed drawings), prepared by Scott Tallon Walker Architects;
- Application Form.

The Advertisement Consent application fee of £462 has been paid online via the Planning Portal.

#### **The Context**

Planning permission was granted in 2014 for the UCLH Phase 4 and Proton Beam Therapy Centre (PBT) under planning application reference 2013/8192/P and subsequently amended by planning application reference 2015/2771/P, 2017/6167/P, 2019/0464/P.

The project, once complete, will be home to one of the only two NHS PBT centres in the UK, with the other centre now open in Manchester. PBT is an advanced form of radiotherapy used for the treatment of complex and hard-to-treat cancers in children and adults. Previously patients had to travel abroad for PBT, but now patients can benefit from local access to this advanced treatment with potentially better outcomes and a lower risk of longer-term side effects. In the floors above the PBT centre, UCLH are developing Europe's largest blood disorder treatment centre and a short-stay surgical service.

The centre will form part of a wider campus, with University College Hospital and the Macmillan Cancer Centre located within close proximity, ensuring that patients benefit from integrated pathways between facilities.

The PBT centre and other services are due to open in autumn 2020. The proposed external signage is critical to ensure that patients and visitors to the new centre and existing facilities can easily identify and navigate their way to and around the building upon opening.

### **Site and Surrounds**

The Phase 4 PBT centre is situated on the corner of Huntley Street and Grafton Way. The principal entrance to the building is on Grafton Way, with a secondary entrance located on Huntley Street. The building wraps around the Simmons Bar (former Jeremy Bentham Pub) on the corner of Huntley Street and University Street.

The site is located within the Bloomsbury Conservation Area and the Parliament Hill and Palace of Westminster Viewing Corridor. There are no statutorily listed or locally listed buildings located on the site, however there are a number of listed buildings in the area, notably the Grade II University College Hospital General Block, the Grade II listed Cruciform Building, and the Grade II University College Hospital Medical School, Nurses Home.

University College Hospital is located to the north of the site and to the east of the site is the Grade II listed Cruciform Building occupied by University College London. The UCLH MacMillan Cancer Centre, which formed Phase 3 of UCLH's proposals to modernise its estate is located to the south of the site.

The site benefits from excellent accessibility, with a Public Transport Accessibility Level (PTAL) of 6b – the highest level that can be achieved. Warren Street London Underground station is located some 150m to the north-west of the site, with Euston Square located some 175m to the north east. Goodge Street station is also located approximately 400m to the south and there are numerous bus routes available on Tottenham Court Road immediately to the west. Kings Cross station and Euston Station are also a short walk to the north-east and provide access to national rail services to the rest of the UK.

### **The Proposal**

Advertisement Consent is sought for non-illuminated directional signage pertaining to the UCLH Hospital Site, with a primary focus on the Phase 4 PBT Unit.

In total, consent is sought for four different types of signage:

- 4 standard UCLH information monoliths, to be located around the perimeter of the building;
- 2 building name signs 'Grafton Way Building', to be located at the corner entrance at Grafton Way and Huntley Street, on each of the flanking walls;
- 1 free-standing building name sign 'Grafton Way Building', to be located at the drop-off entrance on Grafton Way; and
- 4 standard blue and white UCLH NHS Foundation signs, to be located on the fixed glazed panels either side of the main entrance revolving doors at the corner entrance on Grafton Way and Huntley Street and the main entrance at the the drop off area on Grafton Way.

Further information, including the proposed location, materials and dimensions are set out in the supporting External Signage Report, prepared by Scott Tallon Walker Architects.

The proposed signage will be in-keeping with UCLH's standard signage for other hospital buildings.

Whilst consent to display the advertisements for a period of 5 years has been sought, it is envisaged that these signs will need to be in place for a longer period of time, commensurate with the length of time that the building will function as the UCLH Phase 4 PBT centre. We therefore would request that, subject to the proposed advertisements being granted consent, that no conditions are imposed requiring the signage to be removed after the consent expires.

### **Advertisement Regulations and Relevant Planning Policy**

#### The Town and Country Planning (Control of Advertisements) (England) Regulations 2007

As set out in Regulation 3, applications for advertisement consent are to be assessed in respect of the interests of amenity and public safety. The Regulations state:

*"(1) A local planning authority shall exercise its powers under these Regulations in the interests of amenity and public safety, taking into account –*

- (a) The provisions of the development plan, so far as they are material; and*
- (b) Any other relevant factors.*

*(2) Without prejudice to the generality of paragraph (1) (b)—*

*(a) Factors relevant to amenity include the general characteristics of the locality, including the presence of any feature of historic, architectural, cultural or similar interest;*

*(b) Factors relevant to public safety include—*

- (i) The safety of persons using any highway, railway, waterway, dock, harbour or aerodrome (civil or military);*
- (ii) Whether the display of the advertisement in question is likely to obscure, or hinder the ready interpretation of, any traffic sign, railway signal or aid to navigation by water or air;*
- (iii) Whether the display of the advertisement in question is likely to hinder the operation of any device used for the purpose of security or surveillance or for measuring the speed of any vehicle.*

*(3) In taking account of factors relevant to amenity, the local planning authority may, if it thinks fit, disregard any advertisement that is being displayed.*

*(4) Unless it appears to the local planning authority to be required in the interests of amenity or public safety, an express consent for the display of advertisements shall not contain any limitation or restriction relating to the subject matter, content or design of what is to be displayed."*

#### Planning Policy

**Paragraph 132** of the National Planning Policy Framework (NPPF) 2019 states that: *‘The quality and character of places can suffer when advertisements are poorly sited and designed. A separate consent process within the planning system controls the display of advertisements, which should be operated in a way which is simple, efficient and effective. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.’*

LBC adopted its Local Plan in July 2017. **Policy D4 (Advertisements)** of the Local Plan advises that *‘the Council will require advertisements to preserve or enhance the character of their setting and host building. Advertisements must respect 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 further states that LBC *‘will support advertisements that:*

- a. preserve the character and amenity of the area; and*
- b. preserve or enhance heritage assets and conservation areas.’*

And *‘will resist advertisements that:*

- c. contribute to an unsightly proliferation of signage in the area;*
- d. contribute to street clutter in the public realm;*
- e. cause light pollution to nearby residential properties or wildlife habitats;*
- f. have flashing illuminated elements; or*
- g. impact upon public safety.’*

Paragraph 7.82 of the Camden Local Plan further advises that *‘advertisements and signs should be design to be complementary to to and preserve the character of the host building and local area. The size, location, materials, details and illumination of signs must be carefully considered. Interesting and unique styles of advertisements and signs will be considered acceptable where they are compatible with the host buildings and surrounding environment. The Council will resist advertisements where they contribute to or constitute clutter or an unsightly proliferation of signage in the area.’*

In respect of sites within Conservation Areas, paragraph 7.83 states that advertisements *‘require particularly detailed consideration given the sensitivity and historic nature of these areas or buildings. Any advertisements on or near a listed building or in a conservation area must not harm their character and appearance and must not obscure or damage specific architectural features of buildings.’*

Paragraph 7.86 refers to safety, stating that *‘advertisements will not be considered acceptable where they impact upon public safety, including when they:*

- obstruct or impair sight lines to road users at junctions and corners;*
- reduce the effectiveness of a traffic sign or signal;*
- result in glare and dazzle or distract road users;*
- distract road users because of their unusual nature;*

- *disrupt the free flow of pedestrian movement; or*
- *endanger pedestrians forcing them to step on to the road.'*

#### Camden Supplementary Planning Guidance: Advertisements (March 2018)

Paragraph 1.7 of the guidance states that *'good quality advertisements respect the architectural features of the host building and the character and appearance of the surrounding area. As a general guide, the most satisfactory advertisements are those which take into account the character and design of the property, its surroundings and alter the external fabric of the host building as little as possible. Advertisements will not be considered acceptable where they adversely impact upon amenity and public safety.'*

Paragraph 1.8 advises that *'advertisements and signs should respect the form, fabric, design and scale of the host building and setting. All signs should serve as an integral part of the immediate surroundings and be constructed of materials that are sympathetic to the host building and the surrounding area. Interesting and unique styles of advertisements and signs will be considered acceptable where they are compatible with the host buildings and surrounding environment.'*

In respect of heritage and Conservation Areas, paragraph 1.11 advises that *'advertisements in conservation areas and on or near listed buildings require detailed consideration given the sensitivity and historic nature of these areas or buildings. Any advertisements, of whatever type, on or near a listed building or in a conservation area must not harm their character and appearance and must not obscure or damage specific architectural features of buildings.'*

#### Bloomsbury Conservation Area Appraisal (2011)

The Bloomsbury Conservation Area Appraisal and Management Strategy, a supplementary planning document, was adopted in 2011. This document identifies the site to fall within sub-area 4 which runs from Grafton Way to Bayley Street on the eastern side of Tottenham Court Road.

The Bloomsbury Conservation Area Appraisal sets out at paragraph 3.8 that *'The quintessential character of the Conservation Area derives from the grid of streets enclosed by mainly three and four-storey development which has a distinctly urban character of broad streets interspersed by formal squares which provide landscape dominated focal points.'* It goes on to say at paragraphs 3.9 to 3.12 that there is a hierarchy of different scales of streets across the Conservation Area and that the larger streets, such as Tottenham Court Road, have buildings of larger footprints. This too is the case where significant institutions are based such as University College Hospital and University College London.

In relation to sub-area 4, the appraisal states that it is of a commercial character. It also sets out at paragraph 5.50 that *'The dense street blocks south of Grafton Way, between Tottenham Court Road and Huntley Street, are subject to development pressures from major local institutions. However, they contain a number of good examples of 1920s and 1930s commercial and institutional buildings, reflecting Bloomsbury's role in the early 20th century as one of London's most important medical and commercial districts.'*

#### **Consultation**

UCLH is in regular contact with local residents and we understand residents are supportive of our plans to improve wayfinding. The following information has been provided by the UCLH communications team:

*“When the new Royal National ENT and Eastman Dental Hospitals opened in October 2019, there were some issues with patients locating the new building. This negatively impacted on residents and patients. Issues included: lack of street signage and building signage, plus online maps not updating or reflecting the street accurately.*

*We made changes to the building signage within the permissions. Ideally, we would have had additional street signage, and local residents were proposing this to us. The proposal for our new building takes into account the feedback from local residents and the need to provide adequate signage for both the new facility and existing facilities”.*

### **The Case for Consent**

The Town and Country Planning (Control of Advertisements) (England) Regulations 2007, Regulation 3, part 4 states that consent to display advertisements should not contain restrictions relating to the subject, content, or design, unless required in the interests of amenity or public safety. This is further noted in the NPPF, which states that ‘Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.’

#### Amenity

The primary purpose of the proposed signage is to provide information and directions to patients and visitors of the UCLH Phase 4 PBT Centre and the existing hospital buildings. The proximity between University College Hospital, the Macmillan Cancer Centre and the Phase 4 PBT Centre helps to ensure integrated pathways for patients and visitors between facilities. The proposed signage is an important part of ensuring this integration, linking the buildings and assisting users with wayfinding.

The proposed signage is not illuminated and will not cause harm to visual amenity.

The proposed signs will be appropriate and relevant to the hospital building to which they are connected. The materials will be constructed to a high quality and will be of a neutral palette. The signage will be commensurate with other signage in the surrounding area, already established in connection with the UCLH campus.

The proposed external signage is critical to ensure that patients and visitors to the new centre and existing facilities can easily identify and navigate their way to and around the building upon opening. The signage has been designed and positioned so as to ensure sufficient information is available to patients and visitors, but to also ensure not to create street clutter in the public realm. This is in accordance with Policy D4 of Camden’s Local Plan.

As such, the proposals are considered to have no detrimental impact on amenity in accordance with Regulation 3, Part 2a of the Advertisement Regulations.

#### Public Safety

The proposed signage is not illuminated and is not proposed to be located above ground floor level. The proposed signage will not result in glare and dazzle or distract road users, nor will it obstruct or impair sight lines to road users. This is in line with the Camden Local Plan Policy D4.



Consideration has been awarded to the impact of the proposed signage on pedestrians. The proposed monoliths will allow sufficient distances for pedestrians and wheelchair users to occupy the pavement, without disrupting the free flow of pedestrian movement or forcing pavement users to step into the road.

In addition, the proposed freestanding building name sign will be located close to the building entrance, away from the public highway. As with the monoliths, the applicant has ensured that the positioning of the signage will not disrupt the free flow of pedestrian movement outside the building entrance.

The proposal will not give rise to any additional risk to public safety and is therefore in accordance with Regulation 3, Part 2b of the 2007 Advertisement Regulations and also LBC's Development Plan.

### Bloomsbury Conservation Area

Policy D4 of the Camden Local Plan states that LBC will support advertisements that preserve the character and amenity of the area and preserve or enhance heritage assets and conservation areas.

The site is located within the Bloomsbury Conservation Area, which was designated in 1968 and initially intended to encompass principally the Georgian development of the area. Recent amendments to the boundary have broadened the variation of architectural typologies within the Conservation Area and it now embraces a greater range of buildings in date, style and quality. The site became part of the Bloomsbury Conservation Area in 2011 as part of a number of amendments to its boundary

The Bloomsbury Conservation Area Appraisal recognises the commercial character of sub-area 4, in which the site is located. The proposed signage will be appropriate and relevant to the hospital building to which they are connected. The materials will be constructed to a high quality and will be of a neutral palette, in keeping with the commercial character of sub-area 4. The signage will be commensurate with other signage in the surrounding area, already established in connection with the UCLH campus.

The proposed signage will support the usability of the important medical institutional buildings, which characterise sub-area 4 of the Conservation Area. It is considered that in light of this, the proposed signage meets the requirements of Policy D4 of the Camden Local Plan which requires advertisements to preserve and enhance the character and appearance of the Conservation Area.

### **Conclusion**

Advertisement Consent is sought for the installation of non-illuminated directional and informational signage pertaining to the UCLH Phase 4 PBT centre. The proposed external signage is critical to ensure that patients and visitors to the new centre and existing facilities can easily identify and navigate their way to and around the building upon opening.

The proposal is considered commensurate with the surrounding character and amenity of the UCLH campus and provide valuable and important directional and informational cues for patients and visitors of the PBT centre. The signage is considered to be acceptable in terms of amenity and public safety, whilst serving the important function for which they are intended. The proposed signage also preserves and enhances the commercial character of sub-area 4 of the Bloomsbury Conservation Area.

The proposed advertisements are also considered to accord with LBC's local planning policy and the Advertisement Regulations and as such, it is considered that the proposals are entirely appropriate for the site and its context and therefore advertisement consent should be granted.

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Whilst consent to display the advertisements for a period of 5 years has been sought, it is envisaged that these signs will need to be in place for a longer period of time, commensurate with the length of time that the building will function as the UCLH Phase 4 PBT centre. We therefore would seek to request, subject to the proposed advertisements being granted consent, that no conditions are imposed requiring the signage to be removed after the consent expires.

We look forward to receiving confirmation that the application has been validated. In the meantime, if you require any further information or clarification, please contact Louisa Smith of these offices on 0207 399 5850 or Tom Pemberton also of these offices on 0207 399 5147.

Yours sincerely,

*Louisa Smith*

Senior Planning Consultant

**JLL Planning, Development & Heritage**