

Planning - Development Control  
Camden Council  
Camden Town Hall  
London  
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Via Planning Portal – PP-10110337

23 August 2021

Dear Sir,

**BABYLON HEALTHCARE SERVICES LIMITED, 184 DRUMMOND STREET, LONDON NW1 3HP  
TOWN AND COUNTRY PLANNING (CONTROL OF ADVERTISEMENTS) REGULATIONS 2007  
TOWN AND COUNTRY PLANNING ACT 1990**

We write on behalf of our client, Babylon Healthcare Services Limited ('The Applicant'), to submit an application for advertisement consent to display advertisements at 184 Drummond Street NW1.

We also submit a concurrent planning application for external alterations to the building to make minor alterations to the entranceway: a disabled access intercom post to be installed on the edge of the highway and artificial green wall treatment to be applied around the corner entrance and behind the signage on Drummond Street.

Signage is proposed above the existing corner entrance and behind this and around the entrance, a simple green artificial green wall is proposed. This will be fixed on a metal mesh backing to emphasise the health use. This green wall would be removed at the termination of Babylon's occupation and will have very limited impact on the permanent façade. An identical artificial green wall is also proposed as a backing treatment for the signage proposed along Drummond Street.

Accordingly, advertisement consent is sought for:

*"Installation of one illuminated fascia sign on the Drummond Street elevation above the corner entrance measuring 2.43m x 0.64m, installation of a second illuminated fascia sign on the Drummond Street elevation at fascia level above the central bay measuring 2.43m x 0.64m, and two projecting heart-shaped illuminated signs on Drummond and Stanhope Streets measuring 0.85m x 0.66m and two NHS plaques on the entrance columns.*

Planning permission is sought for:

*"Installation of artificial green wall façade treatment for the duration of Babylon's occupation, creation of disabled access intercom post, and replacement of door on Stanhope Street with solid panels."*

In line with Camden Borough Council's (LBC) requirements this application contains the following:

- Covering Letter (including Planning Statement)
- Completed planning and advertisement consent application form
- Site Location Plan (1:500)

- Drawings:
  - 21-1020-(02)AG-G01– Existing ground floor plan
  - 21-1020-(02)AE-003 – Existing Entrance Bay Detail
  - 21-1020-(02)AE-001 – Existing South Elevation
  - 21-1020-(02)AE-002 – Existing West Elevation
  - 21-1020-(30)AD-11 P4 – Proposed elevation drawing and signage
  - 21-1020-(30)AD-12 P4 – Proposed elevation drawing and signage
  - 21-1020-(05)AG-G01 P2 – Proposed ground floor demolition plan
  - 21-1020-(20)AG-G01 P6 – Proposed ground floor plan
- Detailed Design Brochure

The application fee of £366 has been paid online via the Planning Portal.

### **The site**

The unit which Babylon is taking for its clinic lies within the administrative boundary of LBC and the site is outside any Conservation Area. It is within the Central London Area and the Euston Area Plan.

The site is to be put to a new ground floor Class E use with its own entrance from the street.

### **The Proposal**

Advertisement consent is sought to enable this new healthcare use to serve the local residential and office community.

The drawings and design statement submitted as part of this application provide detail on the materials proposed where relevant and the background and text colour. Illumination levels are also provided, for the fascia lettering and projecting signs.

A summary of the application is provided below.

- The signage, consisting of the corporate logo and two lines of text indicating the name of the occupier – Babylon – and the services offered – GP services, is integral to the ability of passers-by to understand the occupation or indeed to locate it. Whilst these matters are generally given ‘deemed consent’ consent is required in this instance due to the size.
- The signage for both fascia signs will measure 2.43m by 0.64m which is 1.555sqm.
- The fascia signage will be face illuminated by LEDs but as individual lettering rather than box illumination. This needs to be internally illuminated in this instance which will be a pure white (6500k) illumination with a maximum 15,000 lumens/m<sup>2</sup> at 2362.5 cd/m<sup>2</sup>. This will also have a suitable PSU / dimmer setup.
- The signage will sit over a green feature wall which will highlight the entrance. Whilst this is not natural foliage, it is intended to lift the entrance by adding visual interest and to act as an additional marker for the entrance for the partially sighted. Also, the eastern part of Drummond Street is a vibrant local centre and this treatment has been conceived as a ground floor marker of this more significant street, on a medium sized commercial building.
- A pair of projecting signs will identify the unit at oblique angles and in long views, utilising the corporate heart-shaped logo (which intentionally matches the phone app logo) as shown on the drawings, and which is itself also a standard healthcare motif. The signs will be made of opal 050 acrylic panels faced off with

- full colour translucent digital print, to be fitted with 12v pure white LED modules and also supplied with a suitable PSU / dimmer setup.
- They will have a maximum 11,571 lumens/m<sup>2</sup> at 1822.6 cd/m<sup>2</sup>.
  - A pair of NHS practice signs will be located on either side of the entrance. These will each measure 0.35m by 0.12m which is 0.042sqm and may benefit from deemed consent under Class 2B and/or Class 5.
  - Also, there will be information screens inside the window within the building, which will benefit from deemed consent under Class 12.
  - A solid infill panel window will replace a door on the western elevation. This will also host a sample drop-off letter box.
  - A disabled access intercom bollard of square dimension in stainless steel will be located adjacent to the entrance.

### **Relevant Planning History**

There are a number of permissions, consents and refusals affecting signage and the building generally. Application 2009/3576/A for a large PVC banner between 3<sup>rd</sup> and 4<sup>th</sup> floors advertising the building was refused in 2010, but the relevance to these proposals is very limited.

### **Advertisement Regulations and Relevant Plan Policy**

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

The regulations define that applications for advertisement consent can only be assessed in respect of the interests of amenity and public safety.

The interests of amenity and public safety as stated at Regulation 3 states:

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

*(3) 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.”*

The Advertisement Regulations make special provision for the illumination of, and therefore additional directional assistance for, medical uses.

#### Development Plan

In accordance with the regulations, the Plan is of relevance to the advertisement proposals. The Camden Local Plan 2017 Policy D4 states 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. We will support advertisements that: a. preserve the character and amenity of the area; and b. preserve or enhance heritage assets and conservation areas. We 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.”*

Supporting text elucidates that *“Interesting and unique styles of advertisements and signs will be considered acceptable where they are compatible with the host buildings and surrounding environment.”*

Euston Area Plan Development Principle EAP 4 for Drummond Street and Hampstead Road is largely silent in relation to the proposals, however supporting text states *“the scale and form of any new or altered ground floor frontages in the Drummond Street/ Euston Street should reflect the fine grained nature of ground floor frontages in the area, in order to maintain existing local character.”* The policy principle seeks to support the vibrancy and specialist role of Drummond Street neighbourhood centre to the east of the site.

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

The Camden Advertisements Guidance seeks to ensure that all outdoor advertising is of high quality, well suited to the building or street for which it is proposed and makes a positive contribution to the appearance and character of the area. The guidance repeats Camden Policy D4 but is non-statutory advice, published to assist property owners who are considering displaying advertisements.

#### **The Case for Advertisement Consent**

The signage is intended to be constructed from high quality materials and the letters are individually illuminated to maintain visual quality and clarity. The building is a medium-sized commercial building in a mixed area and the commercial style of the proposals is considered in keeping with this character. The signage is also of a scale that is in proportion with the dimensions of the façades.

The Advertisement Regulations make special provision for the illumination of, and therefore additional directional assistance for, medical uses. The green wall, acting as a soft marker, is therefore considered to fit within the spirit of the regulations.

The materials chosen are durable and will require minimal maintenance.

Babylon is mindful of the need to ensure that any potential adverse amenity impacts from light pollution are averted. All signs are to be internally illuminated with controlled and dimmable light levels in accordance with the guidelines proposed by the Institute of Lighting Engineers. This will ensure that glare is minimised.

With regards to public safety, the signage is proposed at a 3.4 metre height above the highway, it is not proposed to use any flashing illumination and illumination has been carefully considered to avoid glare. Accordingly, the proposed signs will not give rise to any risk to public safety and are therefore in accordance with Regulation 3 of the Advertisement Regulations 2007.

The text, image and background of the advertisements are considered to be in keeping with the host building which is from the modern era and sits near a local centre in a mixed-use area. The location is specifically outside the conservation area. The proposals are therefore in accordance with Regulation 3 of the Advertisement Regulations 2007, Policy D4 of the Camden Local Plan 2017 and Advertisement SPG 2018.

#### **The Case for Planning Permission**

The limited interventions are all reversible on the conclusion of Babylon’s occupation, and are intended to assist with legibility for passers-by and users of the medical centre. A discreet samples drop-off point and a wheelchair intercom service are required.

The designers have conceived a light weight (non-intrusive) green wall affixed to a metal mesh to highlight the entrance without making a permanent intervention into the building, which can also be easily removed on the conclusion of Babylon's occupation. The signage will sit forward of this, with the whole achieving a welcoming, visual cohesion.

The visually impaired will therefore have a better idea of the location to the unit, which would otherwise be relatively anonymous.

### **Conclusion**

In view of the above, the proposed advertisements and building alterations are considered to be acceptable in terms of amenity and public safety and accord with the provisions of local planning policy and guidance and the Advertisement Regulations. It is therefore considered that advertisement consent and planning permission should be granted.

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 Blythe Dunk or Heather Guyan of these offices on 07912 120627 or 07596 316664 respectively.

Yours faithfully,

**Jones Lang LaSalle Limited**

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