



Express Advertisement Consent Supporting Statement

Our Ref.	SUT-211
Street Hub Address	Outside Wilko, High Street, Throwley Road, Sutton
Postcode	SM1 1EZ
National Grid Reference	E:525972, N:164079
Project Type	Conversion
Conservation Area	Sutton Town Centre High Street Crossroads Conservation Area
Statutory Listed Buildings	N/A
TfL Red Route	N/A

Harlequin Group
Innovation Centre
Maidstone Road
Chatham
Kent
ME5 9FD

t: +44 (0) 1634 661 556
e: planning@harlequin-group.com
w: www.harlequin-group.com





Table of Contents

1.0	Overview	3
1.1	Introduction	3
1.2	Purpose of Advertisement.....	3
1.2.1	Supporting Essential Infrastructure	3
1.2.2	A platform for community and council content.....	3
1.2.3	Advertising for businesses of all sizes.....	4
1.2.4	Content standards	5
1.2.5	Emergency Messaging	5
1.3	Digital Display Screen Technical Specification.....	6
2.0	Planning Policy.....	7
2.1	National Planning Policy and Guidance	7
2.2	Local Planning Policies	7
2.3	Planning Assessment	8
3.0	Health and Safety	9
4.0	Conclusion.....	9
5.0	Proposed Schedule of Operating Conditions.....	10

Rev	Originator	Approved	Date
0	Name	Name	Day/Month/Year
1	Jack Lawrence	Martin Brown	June 2021
<p>© Harlequin Group Town Planning. All rights reserved June 21. This document is expressly provided to and solely for the use of BT Group plc and must not be quoted from, referred to, used by or distributed to any other party without the prior consent of Harlequin Group Town Planning who accept no liability of whatsoever nature for any use by any other party.</p>			
P10			

1.0 Overview

1.1 Introduction

This supporting statement has been prepared by Harlequin Group on behalf of BT Group plc. The statement has been prepared in support of the express advertisement consent application made to the Council for the right to display an advertisement(s) on internally illuminated digital lcd screen to both sides of freestanding 'Street Hub' equipment outside Wilko, High Street, Throwley Road, Sutton, SM1 1EZ (NGR: E-525972, N-164079). This application is made under Regulation 9 of The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (as amended). The statement sets out the most relevant considerations in respect of the proposed advertisement(s).

As per regulation 3 of the Regulations, applications for express advertisement consent must be determined 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.

This request for Express Advertisement Consent is submitted in conjunction with an application for Full Planning for a freestanding 'Street Hub' unit at the above location.

1.2 Purpose of Advertisement

1.2.1 Supporting Essential Infrastructure

Modern cities require digital connectivity provision, both for residents and visitors, to enable their day to day living and enjoyment of recreational activities, all of which contributes to the vitality of the city and its economic and social sustainability. BT's Street Hubs will provide such a service, however, to enable this to be provided free of cost to the taxpayer (national and local), advertisement on either side of the unit is required to support this function, and as such is an intrinsic part of the development.

These screens will display content at 10-second intervals, including commercial content that funds the service, as well as a wide range of local community and council content.

1.2.2 A platform for community and council content

The rotating content on each Street Hub includes a ring-fenced allocation for community content provided by the local council and community. Each local authority is provided with 5% of screen time on each Street Hub unit annually to promote and educate, equivalent to 876 hours per unit or 438 hours per screen. This content would be scheduled and (where needed) developed in partnership with BT and Global, and can tell residents and visitors about local services, local events and news, as well as warnings and public notices.

Additionally, Street Hub designers also create 'house content' throughout the year relating to key events and holidays. Recent examples include supporting the local council elections through encouraging residents to register to vote, free events during school holidays, London Pride, Black History Month and a diverse editorial calendar throughout the year, supporting BT's vision for a 21st century community noticeboard. Street Hubs are more than an advertising screen – they're a key point of reference for local information and an asset to the community.

Street Hubs are also capable of providing access to maps to the public, and giving directions to nearby landmarks and services – a valuable resource for visitors or those without access to a smartphone. They also act as wayfinding boards, giving walkers and cyclists clear directions. Furthermore, local advertisers are encouraged to give simple directions to their businesses.

Furthermore, BT are currently running real-time information from a range of sources, including local weather and transport information. LBC radio content displayed on the unit shares up-to-the-minute news with local communities, enhancing the outdoor experience. In the future, there is opportunity to create relevant community content with open Application Programming Interfaces (API's). Similarly, BT happily work with local authorities, transport providers, and others to determine what real-time information is most useful to the area and how it can be integrated. For example, in London real-time Transport for London (TfL) tube status information is displayed on the site of in-situ Street Hubs. With convenience in mind, BT are also working with TfL to explore how to incorporate other transport information to help people get around the city.

1.2.3 Advertising for businesses of all sizes

Street Hubs represent the latest in advertising platforms – an affordable, accessible digital advertising solution that specifically targets Street Hubs close to small businesses. The Global sales team (responsible for all 'paid for' messaging on Street Hub screens) is set up to work in partnership with small and medium-sized enterprises, letting them use the screens to reach audiences and drive business growth. This advertising revenue lets BT provide all Street Hub services free of charge, and helps fund further rollouts across the UK. The aforementioned Global team have increased the accessibility of Street Hubs in two ways:

Programmatic connection

Global have connected Street Hub to DAX, their programmatic platform. This allows Demand Side Platforms (DSPs) to purchase individual ad slots automatically.

Automated scheduling

Global are connecting the scheduling of Street Hubs directly to their inhouse booking system. This allows key business partners who use API-enabled platforms to easily

book and execute complex and flexible schedules. Global's award-winning Data Planning team manages G-IQ, a data management platform that is used to ingest first and third-party data to prove the efficacy of the display screens and the value of the audience. Using trusted data sources and intelligent mapping tools, effective campaigns can be planned.

Global's unique position as a media owner of channels like Outdoor, Radio and Online allows for more creative scope. For example, they have seen innovative multiple-media campaigns deliver both digital Outdoor messaging in sync with Radio commercials.

1.2.4 Content standards

Street Hubs are funded through the display of advertising in conjunction with other council and community content. The Global team coordinate with advertisers, brands and specialists on commercial content, guided by:

- Committee of Advertising Practice (CAP);
- Code of Practice Guidance for Digital Roadside;
- Advertising and Proposed Best Practice from Transport for London;.
- Non Broadcast Advertising and Direct Promotional Marketing (CAP) Self Regulation Guidelines; and
- Resources from other authorities as necessary

1.2.5 Emergency Messaging

Back-end systems allow BT to control screens dynamically through their head office. As a result, emergency services, such as the police, can quickly display emergency and community awareness messaging. For example, BT have previously partnered with the Camden Town Police in north London to help raise awareness of the threat posed by phone snatchers on mopeds. Content was created for the campaign and included on InLinks (first generation Street Hubs) in the Camden area. Over the course of the campaign there was a significant reduction in the number of phones reported stolen. The Street Hub team are now looking to roll this and similar campaigns out in other areas.

Also, in the event of an emergency or major event, regular content can be replaced with urgent, useful messaging alerting the public to major incidents and offering advice. As each Street Hub is addressable, BT can give specific instructions on individual screens steering people away from a particular area or providing alternatives to travel.

COVID-19 Messaging

Amidst the outbreak of the COVID-19 pandemic, Street Hubs and older generation InLinks were utilised to support health and safety measures and campaigns. As a result, millions of people in UK towns and cities saw public health information during the pandemic, thanks to the street transformation team's support of three key information initiatives. Screen time was doubled for the PHE Stay at Home campaign,

regularly updating guidelines into short, digestible snippets on Street Hubs across the UK. In addition, BT collaborated with local councils to offer support for localised area-specific messaging, and Greater London Council messaging was supported for consistent communication across 14 London boroughs with the Stay at Home and London Together campaigns.

1.3 Digital Display Screen Technical Specification

The technical specification of the two digital display screens are as follows:

Screen Panel Type:	LCD
Screen Dimensions:	95cm wide x 167cm high (75 inch in portrait)
Screen Area:	1.586m
Resolution:	3840 x 2160 UHD
Maximum Daytime Brightness:	2500 cd/m ² (Typ.)
Maximum Nighttime Brightness:	600 cd/m² (Typ.)
Contrast Ratio:	1200:1 (Typ.)
Display Colours:	10bit (D) 1.07 Billion Colours
Viewing Angle:	178/178 degrees
Lamp Type:	LED
Operating Temperature:	0 ~ 50 °C
Sunlight Readable:	Yes

The proposed usage for the screens has been set in accordance with Transport for London's (TfL) policy document 'Guidance for Digital Roadside Advertising and Proposed Best Practice – 2013' [the TfL Guidance].

In addition to the above conditions, each Street Hub location has been assessed against and would comply with the following additional criteria from the TfL Guidance.

- There would be no conflict with any traffic signs, signals, crossing points, schools, hospitals or low bridges.
- No sightlines or clearances would be affected.
- The TfL guidance states that 'Static digital advertising is likely to be acceptable in locations where static advertising exists or would be accepted.' There are existing traditional advertisement on similar sections of the respective roads in many cases.
- The geometry of the roads are not complicated and the driving conditions are not considered to be demanding or complicated.
- The advertisements would not be experienced by a driver in conjunction with any other similar digital advertisements.

- As per the TfL guidance, the advertisements would be located as close to the driver's natural eye line as possible and facing as head-on to the traffic as is practical.

The lighting levels noted above are within the levels set for this type and size of screen (those under 10m²) as set by the Institute of Lighting Professionals, Professional Lighting Guide 05: The Brightness of Illuminated Advertisements.

2.0 Planning Policy

2.1 National Planning Policy and Guidance

National Planning Policy Framework (2019)

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied and is considered to be a material consideration for the Express Advertisement Consent application.

The NPPF states the following specifically in relation to advertisement control:

Paragraph 132

"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."

2.2 Local Planning Policies

The current adopted development plan for Sutton London Borough Council is The Sutton Local Plan. Within this development framework, the sole relevant advertisement specific policy is found via "Policy 28: Character and Design."

Policy 28: Character and Design

Policy 28 states the following regarding advertisements within Sutton:

"Advertisements

The council will not grant permission for advertisements that are detrimental to the visual quality of the borough or do not meet safety requirements. In particular, advertisements must respect the design of the building on which they are erected and the character and amenity of the surrounding area.

All development will also be expected to comply with the guidance set out in the council's Urban Design Guide Supplementary Planning Document or its successor document."

2.3 Planning Assessment

In terms of the proposed development, the relevant national guidance outlined above clearly acknowledges support for advertisement so long as it is exercised in the interests of amenity and public safety. Public benefits are defined within national policy and could be anything that delivers economic, social or environmental progress. Benefits do not always have to be visible or accessible to the public in order to be genuine public benefits.

To ensure maximum amenity benefit for the local area, the services provided by the Street Hub will be available free for everyone (not just BT customers) as they are funded through the inclusion of static commercial advertising alongside Council and community content on the two digital display screens in the same manner as television stations like ITV and Channel 5.

To ensure effective integration with the streetscape the two Street Hub digital display screens are smaller than most other types of outdoor digital signage and automatically dim at night to 600cd/m² in accordance with the levels set for this type and size of screen (those under 10m²) by the Institute of Lighting Professionals, Professional Lighting Guide 05: The Brightness of Illuminated Advertisements. This dimming is based on a predetermined schedule of daylight hours which takes into account seasonal changes, ensuring the Street Hubs remain in harmony with the streetscape throughout the day and minimise disturbance to local residents during the evening hours. Full details of these specifications are provided in Chapter 1.3.

At no cost to taxpayers or users, the proposed advertising on the sides of the Street Hub unit will improve the public realm by providing everyone in the community with an unprecedented suite of essential urban tools, including free council and community advertising, maps and wayfinding, public messaging capabilities, and a platform for future technologies like air quality monitoring. For example, 438 hours of council content will be provided for free on each display screen of each Street Hub per year for the Council to promote local initiatives, news, and events. This equates to 5% of every hour of screen time. Additionally, over 1,000 hours per year of hyper-local content will allow each Street Hub to act as a community notice board with the Street Hub team able to work with local groups to promote nearby events and activities.

To help maximise public safety, the Street Hub display screens will be able to assist in the reporting of crime and disorder by allowing the police to use the screens to display emergency and community messaging. Furthermore, there are opportunities to integrate additional environmental sensors in collaboration with on screen reporting - including on air quality (under trial), noise, and other environmental factors. These integrations would allow for further health and safety information to be displayed to the local community via the two display screens.

Therefore, the proposal for Express Advertisement Consent remains consistent with the relevant development plan Policy 28 against which the proposal should be assessed against, forming part of a package of applications submitted to Sutton London Borough Council.

Further detail is provided in the attached Street Hub Product Statement and associated documents.

3.0 Health and Safety

In accordance with the specific advice in paragraph 67 of NPPF careful siting of the Street Hub will ensure that both amenity and public safety is not compromised in accordance with the Regulations, in terms of visual clutter within the streetscene, including cumulative impact, and ensuring no conflict exists with both pedestrian or traffic safety.

The Street Hub unit design would not constitute a traffic hazard given its height within the existing street scene context, modest size and moderate advertising. The position of each unit has been selected to ensure they would not affect public safety or interrupt visibility splays or sightlines to any extent that would present any road safety issues. Siting has been selected to ensure that the maximum footway width remains following the development to allow safe usage of the pavement by pedestrians and wheelchair users.

Additionally, the Street Hub unit meets all standards required of electrical street furniture of this type, including the Machinery Directive (2006/42/EC), EMC Directive (2014/30/EC) and the associated BS EN ISO standards. BT are committed to proactively ensuring products meet the pertinent safety and certification standards on an ongoing basis.

4.0 Conclusion

As illustrated above, the proposed advertisements on either side of the freestanding Street Hub units will result in an enhancement of the public realm by removing existing uncontrolled advertisements on existing BT payphones and replacing them within a single Street Hub of a sleek modern and innovative design, displaying advertisements of a modern appearance in keeping with its location.

The Street Hub has added benefits of free Wi-Fi connectivity and other valuable services to tourists and recreational users, thereby encouraging greater use of the city's streetscapes as part of the wider digital connectivity expected in modern cities. To enable this to be provided free of cost to the taxpayer (national and local), advertisement on either side of the unit is required to support this function, and as such is an intrinsic part of the development. Beyond the commercial advertising required to sustain the unit, the 5% allocation of time given to Sutton London Borough Council presents a unique opportunity to improve and enhance their existing streetscape, by allowing them to actively display a wide range of local community and council content.

It is considered the advertisements proposed by this application gain support from the Council's development plan and national planning policy in terms of their impact on visual amenity. Furthermore, they are in accordance with the requirements of Regulation 3 in terms of their impact on amenity and public safety and as such this

application should be approved at the council's earliest convenience, thereby giving express consent for the display of the LED digital advertisements forming part of the Street Hub at this location.

5.0 Proposed Schedule of Operating Conditions

To give assurance each Street Hub will operate as intended, we recommend the following conditions (or a version there of) as previously suggested, be included as part of any advertisement consent:

- a. *The intensity of the illumination of the two digital display screens shall not exceed 600 candelas per square metre (cd/m²) between dusk and dawn in line with the maximum permitted recommended luminance as set out by 'The Institute of Lighting Professional's 'Professional Lighting Guide 05: The Brightness of Illuminated Advertisements'.*
- b. *The digital display screens shall not display any moving, or apparently moving, images (including animation, flashing, scrolling three dimensional, intermittent or video elements).*
- c. *The minimum display time for each piece of content on the digital display screens shall be 10 seconds.*
- d. *The interval between each piece of content on the digital display screens shall take place over a period no greater than one second; the complete screen shall change with no visual effects (including swiping or other animated transition methods) between displays and the display will include a mechanism to freeze the image in the event of a malfunction.*
- e. *No content on the digital display screens shall resemble traffic signs, as defined in section 64 of the Road Traffic Regulation Act 1984.*