

28th February 2022

**Out of Home
Media**

Angola
Australia
Austria
Azerbaijan
Bahrain
Belgium
Botswana
Brazil
Bulgaria
Cameroon
Canada
Chile
China
Colombia
Costa Rica
Croatia
Czech Republic
Denmark
Ecuador
El Salvador
Estonia
Eswatini
Finland
France
Gabon
Germany
Guatemala
Hungary
Honduras
India
Ireland
Israel
Italy
Ivory Coast
Japan
Kazakhstan
Korea
Latvia
Lesotho
Lithuania
Luxembourg
Madagascar
Malawi
Mauritius
Mexico
Mongolia
Mozambique
Myanmar
Namibia
New Zealand
Nicaragua
Nigeria
Norway
Oman
Panama
Peru
Poland
Portugal
Qatar
Russia
Saudi Arabia
Singapore
Slovakia
Slovenia
South Africa
Spain
Sweden
Switzerland
Tanzania
Thailand
The Dominican Republic
The Netherlands
Uganda
Ukraine
United Arab Emirates
United Kingdom
United States
Uruguay
Uzbekistan
Zambia
Zimbabwe

Development Control
Development and Street Scene
London Borough of Richmond Upon Thames
Civic Centre 44 York Street
Twickenham
TW1 3BZ

Our Ref: A01805

Dear Sir/Madam,

**Town and Country Planning Act 1990
Town and Country Planning (Control of Advertisements)
(England) Regulations 2007**

Proposal: The Replacement and Upgrade of a Telephone Kiosk to
Communication Hub

Site: Pavement outside No 50 (Waitrose) London Road Twickenham

This letter is in support of applications submitted under the provisions of the above Act and Regulations that seek Planning Permission (PP) and Advertising Consent (AC) to replace a telephone kiosk with Communication Hub unit at the above location.

The application is submitted under the separate provisions in the Planning Act and Advertisement Regulations. The Hub unit is a communication apparatus and installed on the highway under the assumed rights as a registered Code System Operator (CSO) in the Communication Act 2003, however planning permission is required to update and replace the apparatus and advertisement consent is required for the integral display screen on the reverse of the unit.

Included with the application is information on the Hub unit design and available functions, together with elevation drawings of the unit and details on the lighting technology for the LCD screen is included in **PART 2**. Detail on the site location and surrounding townscape includes an OS extract and block plan indicate the position and orientation of the Hub Unit at the application site relative to the existing kiosk¹.

¹ PART 1 Site Plan and Images

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Application Background

In 2018 JCDecaux became a Communication Code Operator with the purchase of the phone Company Infocus Networks Limited. Since then, the Company has applied its experience and flair for innovation into designing and developing a multi-functional unit for modern forms of communication. The rise in mobile phone use correlates with the decline in the use of the traditional public payphone. Many of the existing kiosks are a legacy of the past and are often a blight on our streets. Through misuse and abuse, poor maintenance and vandalism, the reputation of the traditional public phone box is poor and its use declining. Notwithstanding this fact, data from installed Hub units in the UK demonstrate a public desire to stay connected when out of home and that these modern forms of communication are actively used as a means for people to engage with public bodies and vice versa.

The communications industry has changed markedly over the last five years and evolved to address societal and legislative challenges and the need for a reliable and inclusive digital communication infrastructure. The applicant's own aspiration aligns with the Council's vision to become one of London's leading digital boroughs, which is expressed through the Digital Strategy (DS) September 2019.

"We recognise the challenges – and are determined to become a leading digital authority. We see our digital ambitions within a wider context of cultural and transformational ambitions with the potential to lead to:"²

The DS recognizes the essential role of technology in the social and economic wellbeing of the Borough and the life of residents. Technology is a valuable tool in ensuring communities stay connected and in providing inclusive access to Council services and online provisions. The policy document aims to harness the potential of digital technology and the use of smart data to target funding and establishing open channels of communication.

This Proposal will see the removal of one of the older style, single function, phone boxes and its replacement with a modern Communication Hub that will not only improve the look of the furniture but also provide real public benefits for residents and visitors to the Borough. The development of a network of Hub units incorporating a range of communication and digital functions will allow people to stay safe and connected when out of the home. The Proposal will also assist Richmond in realizing the ambition to be a digitally connected, smart Borough. Planning permission and advertisement consent has already been approved for three of the same Hub units in Twickenham and this fourth location will provide comprehensive coverage in the town centre.

² Extract from the Digital Strategy

It is recognised that street furniture, transport and roadside advertising are only part of a wider urban landscape, which is influenced by local character and the needs of local communities. Public mobility, visibility, quality, efficiency as well as the image and perceptions of the Borough are key factors that have influenced the development of the Hub unit, with the aim of making them assets for Richmond.



JCDecaux is an out of home media Company that has for over 50 years played a role in transforming urban landscapes through the provision of a range of well-designed furniture. Visual communication has historically been the foundation of the business, but with the emergence of new forms of communication our business has had to evolve to reflect changing trends. We are committed to applying the same defining principles of quality and service to the communication medium by improving connectivity and using the latest and most advanced messaging platforms. The aim of the business is to seamlessly combine a range of communication formats that deliver high-quality, reliable and innovative forms of communication. Our aim is to ensure our street furniture enhances the public realm through design, innovation and function.

These principles were recognized in the design of the Hub unit through the shortlisting for the IEMA 2020 Awards. The IEMA Awards identify and reward Companies, teams and organizations that have developed innovative solutions to deal with urban challenges. The Hub unit was shortlisted in two important categories; on the integration of sustainability principles into the unit's design; and in its potential as a platform for social and community engagement and inclusion.

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The Proposal

The proposal is for the replacement of the existing single function enclosed kiosk with an open accessible Hub unit that includes services that support access to the latest generation of digital networks. This type of communication development is supported in the National Planning Policy Framework (NPPF) and Governments Statement of Strategic Priorities³ which endorses the Borough's strategic aim of providing the UK with world-class digital connectivity that is gigabit-capable, reliable, secure and widely available across the UK.

The traditional role of the telephone kiosk is ill equipped for the modern world of digital communication. The multifunctional Hub unit has been designed to bring this public service up to date through the next generation of communication provision that gives more to the public and contributes to the vitality and vibrancy of our town centres. Access to the digital services offered by the Hub and the provision and maintenance of the Hub unit itself is entirely funded by the revenue derived from the advertised on the reverse of the unit, as illustrated in the application documents⁴. The communication equipment will enable the Council to extend its existing passive Wi-Fi provision to Borough residents and businesses without cost to the public purse. This use of street furniture and other infrastructure to extend networks is identified in the DS as providing a means to maximum the benefits to people living, working or visiting the borough.

Recent discussions with the Metropolitan Police have highlighting the common challenges of anti-social behaviour in towns and cities across the UK. The power of the public screen is recognised as an effective tool to reach the public not only for commercial messaging, the screen at the application site and others within the Borough will be made available as a share of time to support the role of the Police and other local public agencies in crime prevention and public education.

Hub Functions and Features

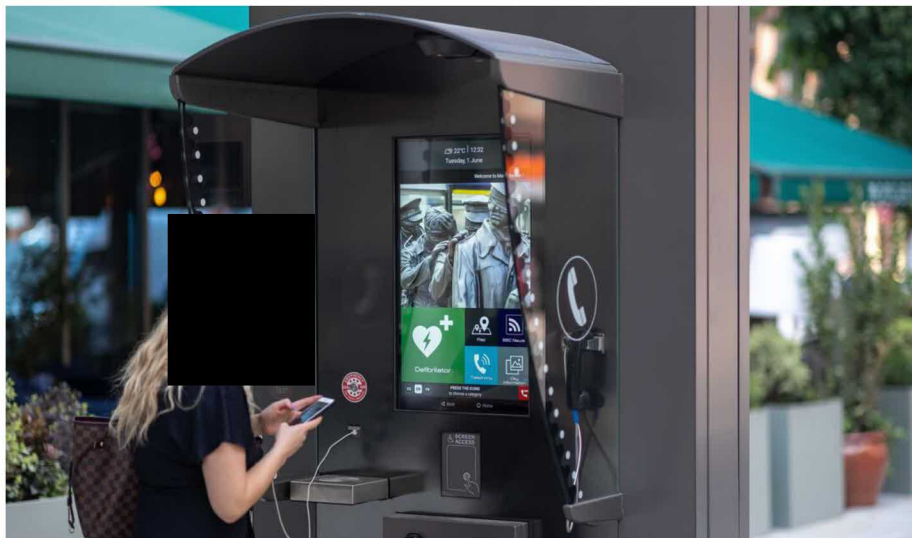
The Hub provides an opportunity to offer innovative services to the public and follows an open public invitation for ideas through the "Intelligent Urban Furniture" Project. This Project looked at functional and achievable improvements that could be made to street furniture in the streets of Paris. Adopted improvements includes the provision of free ultrafast Wi-Fi, free phone calls to landlines and charities, public use defibrillator, default area wayfinding, device charging, rapid connection to emergency services, public messaging capabilities. The use of digital technology in both the display screen and communication interface also provides a platform

³ Statement of Strategic Priorities for telecommunications, the management of radio spectrum, and postal services July 2019 Department of Digital, Culture, Media and Sport.

⁴ PART 2 Hub Unit Detail

for other technologies that record and show environmental conditions, climate conditions, and the collection of key data on the numbers of people movements on the street. These innovations are implemented against the backdrop of energy savings to help address the climate emergency. All Hub units are powered by Green energy and lit using high-capacity batteries, powered by solar energy.

Research is ongoing into new technical solutions around the themes of Intelligent City, Big Data and Open Data adapted to the urban environment. The touchscreen facility in the Hub units incorporate links to local charities relating to mental health, homelessness and child protection. Currently under development is voice activation, which will be particularly helpful for those with disabilities but also, in a post Covid 19 World, will ultimately enable calls to be made and browsers to be opened by voice command and without touching a screen or using a handset.



PART 2 of the application documents provides the detail and dimensions of the Hub unit and an illustration of the range of functions it can provide beyond telephony and advertising. Each unit will stand at 2.63m in height and 1.33m wide and occupy a site area of less than 0.3m². The unit has undergone rigorous testing in extreme conditions and can boast 13.5mm thick anti-vandal toughened safety laminated glass on all glazed surfaces. The other external elements have been treated with a nanotech surface treatment to enable easy removal of stickers and/or sprayed paint to the external surfaces. The unit has a protection rating against impact of >IK10. All electrical circuitry is inaccessible to the public and the unit features hidden fixings that require specialist tools to enable access.

The unit will feature on one side a display screen and on the other a touchpad. The method of display for both the screens will comprise the latest high definition LCD product with the luminance level adjusted via an inbuilt light sensor and limited to a

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maximum 300Cdm² at nighttime⁵. The advertisement screen will show illuminated static images that automatically change by means of a remote server. An inbuilt light sensor controls lighting levels during the day and adjust them to reflect seasonal changes and environmental conditions. Should the unit malfunction the screen will switch off and automatically alert JCDecaux's dedicated digital team of the fault to schedule a repair visit. The display screen on the reverse of the Hub unit will switch off between the hours of 11:59 p.m. and 6:00 a.m., thus reducing energy use by 43%.

The digital SmartScreen product incorporates Power Factor Correction (PFC) technology to maximize the efficiency of all power connections. The units are RoHS approved and completely devoid of hazardous materials making them easier to recycle at end of life in accordance with the WEEE directive (Europe) on the recycling of electrical and electronic waste. The size of the screen is uniform and provides a display area of approximately 1.9m². When not in active use the touchpad screen will default to a map of the Borough and shortcuts to the most often used apps and links to Council services. A touchpad is positioned at 1m from the ground to provide easy access for wheelchair users and the screen is designed with high contrast colours to assist the partially sighted.

Defibrillator

A notable provision that is unique to the Hub unit is the integral defibrillator. Since 2019 JCDecaux has worked in partnership with the Community Heartbeat Trust (CHT), a registered charity that promotes the provision of defibrillators in public spaces, which made them the perfect partner for this Proposal. Cardiac arrest is a real issue in all communities with over 100,000 hospital admissions each year. A heart attack can happen to anyone and anywhere and the survival rate is just 1:10, yet the early use of a defibrillator can triple the chances of someone surviving an attack. Each Hub unit is equipped with an easy to use defibrillator and local training can be organized through CHT funded by JCDecaux, to ensure that when needed, this equipment can be quickly deployed to save a life.

Finally, in terms of sustainability policy, JCDecaux's Research and Development team has undertaken studies on the adaptation of existing systems for energy reduction and the use of green energy. There has been significant progress in the selection of energy efficient electronic components, the adaptation of software layers and the integration of solar energy, which are now imbedded in the Hub unit design. Last year the Company joined RE100, a global leadership initiative for

⁵ The maximum night-time limit for advertisements under 10m² in City Centres as recommended by the Institute of Lighting Professionals

companies committed to 100% renewable electricity. The UK Company uses on green energy from renewal sources to power all of its advertising displays.⁶

Use of Hub Services

The Hub units will help to make Richmond a smart connected borough and form part of the 4G/5G delivery. Of equal importance is the need to ensure the Hub units do not inadvertently provide a service that is too easily abused. Experience has shown that some phone boxes across London and other main UK cities are used for purposes other than those for which they were intended. The issues centre on the lack of proper management of calls and regular maintenance of the equipment. Any free to use service has the potential to be abused by a small minority, however it remains our policy to provide a free service for the benefit of the wider public in phone, internet and device charging. We look to working with the local authorities to implement a more restricted use policy for Hub units that are located in known problem areas.

In such locations there will be a prohibition on any free calls, other than emergency help lines and a limit placed on the free charging period as an emergency facility only where, for example, a person's mobile phone is low on power and needs a rapid charge in order for it to be used. This function is 'super charge' capable for a short duration using USB Power Delivery 3.0 PPS (programmable power standard) and designed around a charging pocket.

A range of additional management measures are possible, and the Management Plan is designed to be flexible enough to adapt to changing circumstances and experiences under the advice of the Met Police. Security measures can include;

- Automatic block where the same number is frequently called from a Hub unit
- The display of warning messages to deter misuse
- The provision of built in CCTV security camera to record misuse

In all other locations the phone service will be free to landlines and charity helplines, such as Shelter, Samaritans and Childline. Emergency service speed dialing is also standard for all Hub units and reverse charging for outgoing calls will also be available. The Company is committed to the proper management of the service and future operation of the Hub units will be managed and monitored in co-operation with the Council and local law enforcement agencies. The use and functions of the Hub units will be constantly reviewed and adapted to best practice in order to design out the potential and opportunity for crime.

⁶ PART 3 Sustainability Aims and Objectives

The display screen on the reverse of the Hub unit is designed to be used to display a range of messages, not only commercial advertising. Through our work with LG Comms, time on the screens will be made available to the Council for the purpose of public announcement or to heighten awareness of an issue of community concern in the local area. The screens can be used to inform residents and visitors about local services, local events and news or to simply promote the Borough as a safe and connected place for people to live, to invest, to visit and to work.

The Application Site

The application site is occupied by an existing phone kiosk, of which the Hub unit is a direct replacement, located within the retail/commercial context of London Road. The Hub unit will occupy the existing footprint of the kiosk it is to replace, although as illustrated in the application documentation, occupies a smaller area. London Road is a busy thoroughfare and the site ideally located in front of an active retail outlet where people are most likely to see and use the facilities provide by the Hub unit. It is not the intention to overload borough streets with an excess of apparatus, rather to strike the right balance between overall unit number and distribution to the busiest areas. The existing kiosk location has been reassessed in planning terms, mindful of the local context and character. The safety assessment examined the proximity of the Hub unit to road junctions and crossings where drivers need to take special care, as well as the available pavement widths to ensure the unit can be successfully accommodated in line with TfL standards⁷.

Given the busy commercial surrounding at the application site the Hub unit would not look out of place or unusual, particularly as a replacement of an existing item of furniture. Within this setting the display of advertising imagery is commonplace and concomitant to the retail activity. The site adjoins a busy road and well-travelled footpath, however the unit position close to the road edge would not impede pedestrian movement along the street but represent a marginal widening due to the narrower unit width. Overall the width of footpath is sufficient for the unit without interference or obstruction to the existing and established pedestrian flow.

Material Considerations

The applications are submitted under the provisions of the 1990 Planning Act and subordinate Advertisement Regulations. Planning permission is required for the physical elements of the communication apparatus and consent for the display of advertisement on the rear of the Hub Unit.

National Policy Guidance

The National Planning Policy Framework July 2021(NPPF), sets out the Government's planning policies for England and how these should be applied. The

⁷ PARTs 4 and 6 TfL Streetscape Guidance extract

updated NPPF maintains the role of the planning system in supporting sustainable forms of development. Development can fulfil an economic, social and environmental objective and achieving them through sustainable means is a fundamental principle throughout the guidance.

Advertising plays an important role in a diverse and vibrant market economy by encouraging consumer confidence and spending, which contributes to sustainable economic growth. Advertising is also an essential support for business through the promotion of products and services which drives consumer spending. The use of land for advertising is therefore consistent with the aim of sustainability and its support for a viable market economy. In respect of outdoor advertising the NPPF 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.”

Part 6 of the NPPF emphasises the role of the planning system in encouraging businesses to invest, innovate and adapt to changing market needs. Part 10 covers the essential role a high-quality communications infrastructure has on the delivery of sustained economic growth and how the planning system should act to support such development. Paragraph 114 states:

“Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. Policies should set out how high-quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments”

Furthermore paragraph 118 confirms :

“Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system...”

Part 12 covers the importance of design in managing and improving spaces and the quality of place. The design of all built form, including street furniture, must be sustainable and functional but also attractive and include innovation in the design evolution. Paragraph 126 says :

“Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”

On design, the Framework states that:

“Planning policies and decisions should ensure that developments:

- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”

And that significant weight is given to:

“outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.”

The proposed upgrade of the existing kiosks in Richmond is supported by the policy aims of the NPPF.

Specific guidance relating to advertising developments and the interpretation of the Regulations is contained within **Planning Practice Guidance** (“PPG”). Section 8 of the PPG on Advertisements March 2014, as amended, explains in greater detail the criteria for considering amenity issues in advertising proposals. More specifically, on the matter of scale the guidance suggests that advertisements should respect the scale of the surroundings;

“...for example, if the locality where the advertisement is to be displayed has important scenic, historic, architectural or cultural features, the local planning authority would consider whether it is in scale and in keeping with these features.”

It further advises that;

“This might mean that a large poster-hoarding would be refused where it would dominate a group of listed buildings, but would be permitted in an industrial or commercial area of a major city (where there are large buildings and main highways) where the advertisement would not adversely affect the visual amenity of the neighbourhood of the site.”

On matters of Public Safety, the PPG states that:

“All advertisements are intended to attract attention but proposed advertisements at points where drivers need to take more care are more likely to affect public safety. For example, at junctions, roundabouts, pedestrian crossings, on the approach to a low bridge or level crossing or other places where local conditions present traffic hazards. There are less likely to be road safety problems if the advertisement is on a site within a commercial or industrial locality, if it is a shop fascia sign, name-board, trade or business sign, or a normal poster panel, and if the advertisement is not on the skyline.”

Local Policy Guidance

The London Plan

Chapter 3 of the Plan covers design and Policies D4 and D5 and although issued in a more abstract form from the detail of this form of development, it nevertheless encourages the development of good quality inclusive design that is accessible to all. Policy D11 concerns the desire to reduce crime and opportunities for crime through the quality of design, which can contribute to a sense of security without being overbearing or intimidating. In particular, the policy recognizes the need for development to incorporate safety features, which are a key part of the Hub development, as part of the overall safety infrastructure. The development for of the Hub units in London has been formulated in consultation with the Met Police design out crime team to ensure the design and use of the Hub units assists with crime prevention rather than exacerbate existing issues.

Chapter 9 concerns sustainable infrastructure and is supportive of this current development, particularly SI 6. This policy and the thread running through the Plan on matters of social cohesion and business development, encourage the use of smart technology to create a smart City that is responsive to the way people live and interact with their environment. The Plan recognizes the importance of having a world class digital infrastructure and the role in encouraging enterprise and better connectivity. Policy objectives in this chapter covering the best use and reuse of valuable resources also supports the applicant's sustainability objective; the drive toward zero carbon emissions and only using renewable energy sources to power the estate. All the applicant's service vehicles are electric powered and the use of digital technology to run advertising displays greatly reduces the energy requirement.

The provision of the Hub network in the Borough supplements and supports the aims in Policy HC 6 on the night time economy of town centres by providing an accessible communication facility that not only assists in navigating around the town centre, via the wayfinding map, but also in offering a range of services readily at hand for everyone and anyone in need of emergency assistance. The provision of accessible defibrillators in each Hub unit also reinforces the policy aim of CG3 to create a healthy populace and to have the necessary infrastructure in place to assist in case of healthcare emergencies.

Amenity

JCDecaux has built its reputation on delivering innovative, attractive concepts by calling upon a wide range of experts. JCDecaux has worked with over 50 world-famous architects and designers on projects in cities across the world. The Company embraces the concept that street furniture can contribute to improving the quality of our streets to make them safer, cared for and attractive. London Road

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in Twickenham is a busy, mixed use thoroughfare with a pronounced commercial presence, with many large-scale commercial premises lining the streets, together with other forms of roadside advertisement. Richmond is also an important historic borough with many unique and striking historic buildings and localities where development needs to be carefully considered, thoughtful and respectful of the local historical significance.

The scale of buildings and character of the is varied, ranging from substantial commercial retail and office buildings to small scale shop premises. An element of residential use is also a feature, although typically confined to upper floors. The site is occupied with an existing advertised kiosk and has been chosen because the impact of the change in structure and form upon the character and appearance of the area would be negligible. The design of the Hub unit is purposefully unassuming with the advertised area reduced to the same size of display that is found on other furniture across the Borough. The scale of display is appropriate to the pedestrian environment and will be used to support the retail offering and provide a platform for community messaging. The proportions of the advertising element are designed to be at a human scale without overwhelming passers-by. The site is located away from any high value heritage asset and it is considered the immediate local context could support this type of modern structure without harming important views or historic sensitivities.

The integral advertisement on the Hub unit is elevated above the pavement and intended to be visible principally to pedestrians but also to passing vehicular traffic. The advertisement needs to be visible but is designed to complement the street layout without appearing intrusive or out of place. One of the main aims of policy is to ensure a high quality of design and conformity with the general principle of safeguarding amenity and public safety as contained within national guidance. Overall the Proposal would accord with policy guidance and will not harm local visual amenity.

Public Safety

Public safety issues concern the effect an advertisement display is likely to have on drivers and pedestrians, and whether the position of the advertisement or the manner of its display is likely to be so distracting or confusing as to endanger the public. The advertisements affixed to the Hub unit is prominently positioned on the public footpath to be readily visible when approaching either on foot or by vehicle. The main audience will be pedestrians although fleetingly visible to drivers. The proposal site has a sufficient width of available footpath without causing an unacceptable narrowing of the available pavement, in accordance with TfL guidance. The prominence of the site, which is an existing call box and part of the street, will provide ample opportunity to people to see the simple messages on

display as they pass by. The same is true for drivers, who will see the displays alongside busy active street frontages and so are less likely to view a roadside display in this context as a distraction. As mentioned earlier the character and setting of the application site is overwhelmingly commercial, with brightly lit shop fronts and other premises forming the immediate backdrop and visual context.

In respect of impact of drivers, the approach to the site is along a straight road with a low speed limit and where there isn't a heavy burden on a driver's concentration. By the time a driver sees the application site he/she will have travelled through an overtly commercial setting and would have passed many retail premises and seen many other roadside attractions. A driver's expectation of seeing advertising imagery is therefore already very high and consequently reduces considerably any potential for a driver to become confused or distracted. As such, the adverts would not appear wholly incongruous or intrusive in this context. The adverts would not have an unacceptable effect on the visual amenity of the area nor present a danger to the public.

Other Matters

One issue not covered by Policy but of considerable importance to the application is the standard of remediation and reinstatement of the public footpath associated with the removals, new installation and altered foundations. It is understood that the quality of reinstatement work by Statutory Undertakers can vary and has been an issue for many local authorities. The Company is fully committed to ensuring the quality of all out installations are exemplary and have worked closely with other Highway Authorities in the UK to maintain a high standard of workmanship. Attached at **PART 5** are examples of recent reinstatement works following the installation of a foundation for Hub units in Birmingham.

Conditions

The mechanism exists within the planning system to provide a level of control over the manner and use of roadside advertising in the interest of amenity and safety, as expressed in the Regulations. All consents for express advertisement consent are covered by the standard conditions set out in Schedule 2 to the Regulations and are included in the list of conditions in **PART 7**. It is proposed that the following special conditions should be applied to any advertisement consent:

- The intensity of the illumination of the signs shall not exceed 300 cd/sqm from dusk till dawn
- Any change in advertisement display shall be instantaneous
- The displays shall not display any moving, or apparently moving, images
- The advertisements displayed on each panel shall not change more frequently than once every 10 seconds.

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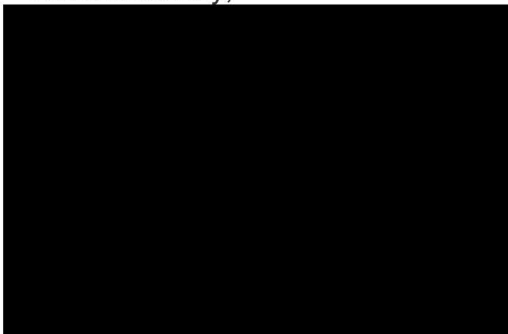
The above special conditions are now used as best practice for the control of digital advertisements having been originally proposed by Transport for London (TfL) in relation to applications adjacent to the strategic road network. Digital technology is by its nature a more sustainable and versatile method of displaying images and messages in real time and in cases of emergency. JCDecaux fully accepts that this functionality could and should be used to create safer streets and places. We are therefore committed to working with local authorities to ensure our apparatus is designed and used in a way that assists in reducing crime. The Management Plan has been formulated with the assistance of the Met Police, Designing Out Crime unit, and forms part of the application documentation, as does the Company's commitment to work with the Met Police and adaptive to changes in Borough Policing.

Summary

The UK is currently at the forefront in the development of multifunctional digital furniture and the provision of accessible communication apparatus that provides more than simply a means to make voice calls. Many cities recognise the value such development can provide, which complements and support their public service provision and delivery. This proposal is designed to integrate successfully into the street without harm to the interests of visual amenity or the safety of the public. The Proposal is appropriate development that is consistent with both national and local policy on advertisement control and the development of reliable digital infrastructure. This development is part of a wider programme to improve communication provision that will showcase the Borough as an attractive place to live, work and visit.

I trust that the above and enclosed documents clearly explain the nature of the Proposal but please call me if there are any further matters on which you may need clarification.

Yours sincerely,



Application Documents

Covering Letter

PART 1 Site Plan

PART 2 Hub Unit Detail

PART 3 Sustainability Aims

PART 4 TfL Pedestrian Comfort Zone Guidance

PART 5 Pavement Remediation

PART 6 Section 11 TfL Streetscape Guidance

PART 7 Suggested Conditions