

12th August 2024

Out of Home Media

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Cameroon
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China
Colombia
Costa Rica
Croatia
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Estonia
Eswatini
Finland
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Gabon
Germany
Guatemala
Hungary
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India
Ireland
Israel
Italy
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Japan
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Korea
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Lesotho
Lithuania
Luxembourg
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Mozambique
Myanmar
Namibia
New Zealand
Nicaragua
Nigeria
Norway
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Peru
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Qatar
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Singapore
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South Africa
Spain
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The Dominican Republic
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Ukraine
United Arab Emirates
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Uruguay
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Zimbabwe

Reading Borough Council Planning Services Civic Offices Bridge Street Reading RG1 2LU

Dear Sir/Madam

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

Re: Installation of Communication Hubs with Integral Defibrillator and Advertisement Display

Proposal Sites:

- **Site 1 - Pavement Outside 73-74 Broad Street, Reading, RG1 2AP**
- **Site 2 - Pavement Outside Metro Bank, St Mary's Butts, Reading, RG1 7QE**
- **Site 3 – Pavement Outside 110-117 Friar Street, Reading, RG1 1EP**
- **Site 4 – Pavement Outside 29 Friar Street, Reading, RG1 1DP**

Please find the applications for advertisement consent (AC) and planning permission (PP) enclosed for the installation of three Communication Hubs at the above sites within the centre of Reading Town Centre.

The application sites are all within the town centre and located in areas of heavy footfall where people will see and use the apparatus. The sites do not fall within the designated Conservation Areas and have been sensitively sited to not have any impact on the heritage assets of Reading Town Centre. The proposed hubs will form part of the commercial centre where the retail activity is the dominant use and holds influence on the street pattern and appearance. Within the context of the application sites, it is considered the proposed communication Hub unit would not appear out of place but would complement the public realm and enhance the experience of people visiting Reading. The Hub units offer a range of publicly accessible functions which include free calls to landlines, free Wi-Fi, interactive wayfinding, direct access to local webpages, a 24/7 publicly accessible defibrillator and device charging. The communication apparatus also includes an advertised face on the reverse of the unit.

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Background to the Application

It is recognised that all development needs to be carefully managed to avoid creating a plethora of discordant and unsympathetic furniture that detract from, rather than enhances the look and quality of the street. The applicant's aim is to develop furniture that makes a positive contribution to the public realm through design, innovation, and functionality. To that end, the applicant's aspirations align with that of the Council's in supporting good quality design. The use and application of modern digital technology can promote inclusivity and harness the potential to keep communities connected whilst supporting the retail functions that benefit residents, visitors, and businesses.



Primarily these proposals, which are submitted on behalf of In Focus Public Networks Ltd, are communication apparatus that use the latest form of digital technology. Support for the development of digital infrastructure is found under Chapter 10 of the National Planning Policy Framework (NPPF). The proposals in these applications assist towards realising the ambition of expanding the electronic communications networks in the UK, including next generation mobile technology and full fibre broadband connections available to all. The traditional role of the telephone box seems ill equipped to keep pace with the modern digital environment. The proposed Hubs will act as portals to enable people to access digital networks and to complement any existing free Wi-Fi 4G/5G provision, whilst the advertising screen will promote and strengthen the role and support the retail function of the centre to draw visitors and shoppers alike.

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Good design is recognised as an important component in creating a sense of place and inspiring cityscapes that can brighten and enrich people's lives. The communication Hub is a new product and one that embodies the principles of good design, sustainability and innovation in product development. These attributes are the main features of this furniture, qualities that distinguished the Hub Unit in the IEMA 2020 Awards shortlist. The IEMA Awards recognises 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 in the design; and use of the platform for social and community engagement and inclusion.

Development Detail

The specification of the Hub Unit is included with the application documents, which provide an illustration of the overall dimensions and the range of functions that are provided. The Hub Unit is based on our "Forum" unit, which was designed by Fosters and Partners. The unit stands at a height of approximately 2.63 meters, has a slender side profile measuring 0.3 metres and occupies an area of around 0.4m² metres. The screen is elevated by 530mm above the pavement and intended for a pedestrian audience. The communication side of the unit includes a projecting canopy comprising solar panels that are used to light the unit. The communication side of the Hub is activated via a 32" touchscreen above a defibrillator cabinet, which is a standard feature on all units. This side of the Hub also includes the charging point, direct emergency service line and local news channels. When not in use the 32" screen can be programmed to default to a map of the town centre. 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.

The Unit brings In Focus public phone services up to date to include the next generation of communication provision which is free to the public. This type of development is supported by the Governments Statement of Strategic Priorities¹, which expresses the aim of creating a reliable and accessible World class digital infrastructure in the UK. The provision of the free to use network is funded by the revenue from the advertisement on the rear of the unit. The advertising face is equivalent to the size of display found on bus shelters and other street furniture within urban areas. The advertised façade comprises an ultra-HD LCD screen for outdoor use, making it visible in direct sunlight and able to automatically adjust to ambient changes by means of an inbuilt light sensor, and limited to a maximum

¹ Statement of Strategic Priorities for telecommunications, the management of radio spectrum, and postal services July 2019 Department of Digital, Culture, Media and Sport.

300Cdm² at night-time². The screen can show both static and dynamic content which is changed remotely via a secure direct ISDN feed every 8-10 seconds. The screen is primarily used to display commercial messages but includes a dedicated share of time for community messaging via the Council's Community channel or used as a platform to promote local safety campaigns.



GM Police Crime Awareness Campaign in Manchester City Centre

The Hub specification covers some of the potential functions that can be provided by the Hub unit, and which are currently being trialed in other Cities and Boroughs. These include air quality sensors through our collaboration with the Company airy³; pedestrian flow monitoring to enable Councils to better understand people movements and flows within their area; in built CCTV cameras to supplement local provision. Technological advances are driving the development of a range of functions that can be incorporated into street furniture to enable local authorities to better understand and plan for changes in the urban environment. All these capabilities are funded by the advertising revenue from the single display on the Hub unit, 50p in every £1 of which is reinvested in furniture to support public services.

Defibrillator

² The maximum night-time limit for advertisements under 10m² in City Centres as recommended by the Institute of Lighting Professionals March 2023

³<https://airy.org/en/>

A notable provision that is unique to the Hub unit is the integral defibrillator. Since 2019 the applicant has worked in partnership with the Community Heartbeat Trust (CHT), a registered charity that promotes the provision of defibrillators in public spaces, making it the ideal partner for this Proposal. Cardiac arrest is a real issue for all communities with over 100,000 hospital admissions in the UK each year. Cardiac arrest survival rates are 70% if a defibrillator is used within five minutes, and every minute of delay reduces the chance of survival by up to 10%. Each Hub unit is equipped with a defibrillator which is provided and maintained by the applicant and added to WebNos, the National register of available devices. Instructions of how to activate and use the device can be displayed on screen in various languages and local training is organised through CHT and funded by the income from the commercial display, to ensure that when needed, this equipment can be quickly deployed to save a life. These associated facility or services are available for public use and without charge for the purpose of making the provision of the communication network possible.

In respect to sustainability, JCDecaux's Research and Development team has undertaken studies on the adaptation of existing systems for energy reduction. 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. In 2020 the Company joined RE100, a global leadership initiative for companies committed to 100% renewable electricity, which powers all our display screens. Digital technology now represents a viable alternative to the printed form of displays and is a more environmentally responsible means of roadside display. 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 waste⁴.

Policy Considerations

National Guidance

The applications are submitted under the provisions of the 1990 Planning Act and subordinate Advertisement Regulations 2007. Planning permission is required for the installation of the electronic communication apparatus, which is permitted as forming part of the applicant's communications network. Advertisement consent is required to display an advertisement on the apparatus. The main issues are the effect of the proposed Hub units on the character and appearance of town centre

⁴ Appendix C

streets and protected buildings, together with the effect on the proposals on pedestrian and driver safety.

The National Planning Policy Framework 2023 (**NPPF**) sets out the Government's planning policies for England and how these should be applied. The framework reaffirms the role of the planning system in supporting sustainable forms of development. 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. The use of land for advertising purposes is therefore consistent with sustainability aims and support of a viable market economy. In respect of 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."*⁵

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 118 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 122 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

⁵ Para 141

sustainable and functional but also attractive and include innovation in the design evolution. Paragraph 131 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.”

Overall it is considered that the proposal are 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 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.”

Amenity

This proposal relates to four potential sites which are considered suitable locations for the development of a Hub unit. Each site has been selected in a prominent location and of a scale where the Hub unit would not dominate the street scene and positioned to be outside of any designated conservation areas. Care has been taken to avoid the heritage assets of Reading Town Centre. The scale and design of furniture is considered concomitant with the character of the commercial surroundings of the town centre. The provision of modern furniture that provides a range of communication functions and is free to use by the public is a tangible benefit not just for the individual user but also for the wider town centre. Well-designed street furniture can contribute to improving the quality of streets and make them safer, cared for and attractive places to visit. The town centre is a vibrant and busy, well-lit urban setting with a pronounced commercial profile.

The architecture of the centre presents a diverse range of building styles and attractive shop fronts. At street level the building frontages comprise an eclectic mix of retail uses each with their own distinctive array of commercial advertising material and displays that one would typically find within a commercial centre. Other forms of freestanding and bus stop advertising displays of a similar scale to the proposals are also a prominent feature of the town centre thoroughfares. The application sites were chosen with care to form a discrete network and within the setting of buildings that could support the presence of a modern item of street furniture without causing harm to visual amenity.

The design of the Hub unit is purposefully unassuming and in scale with other types of advertised structures found within an urban context, either as freestanding roadside units or attached to other items of street furniture. The size of advertising, commonly known as a 6 sheet, is appropriate to the pedestrian environment and designed to be of a human scale without overwhelming passers-by. The screens will advertise products sold in local shops and provide a platform for community and safety messaging. The overall effect of the proposals is not considered to be harmful.

Public Safety

Public safety issues are principally concerned with the effect of an advertisement display on drivers or 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 Hub units are prominently positioned on the public footpath to be readily visible to pedestrians rather than drivers, although the structures will be visible to drivers passing the sites on the junction of Oxford Road and St Mary's Butts and along Friar Street. At both proposed sites, the highway is mostly restricted to buses

and taxis so it is anticipated that traffic speeds are low and mostly traversed by professional drivers. In all cases the available pavement widths are generous and circulation space sufficient to accommodate the unit without inappropriately reducing the width of the public footway or harming the safe and efficient operation of the footway.

The prominence of the sites also ensures that there will be ample opportunity for people to see the simple messages on display as they pass by. As mentioned above, the character of the application sites is that of a busy town centre, which includes many lit shop fronts and other premises forming the immediate backdrop and wider setting. 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 proposed Hub units would accord with policy guidance and would neither harm visual amenity, detract from any heritage asset or prejudice public safety.

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 applicant is fully committed to ensuring the quality of all installations are exemplary and have worked closely with other Highway Authorities in the UK to maintain a high standard of workmanship. The application documents include examples of recent reinstatement works.

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. It is proposed that the following special conditions should be applied to any advertisement consent:

- The illumination of the advertisement hereby approved shall not exceed 300Cdm² during the hours of darkness.
- The advertisements displayed on each panel shall not change more frequently than once every 10 seconds.
- Any change in advertisement display shall be instantaneous.
- The advertisement display will switch off between 12:00 midnight and 6:00A.M.

Should a reduced luminance level be considered appropriate in these cases, then a 200Cdm² limit would be acceptable. 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. The applicant is committed to working with local authorities to ensure our apparatus is designed and used in a way that assists in reducing crime. A Management Plan has been formulated with the assistance of the Police Designing Out Crime unit and forms part of the application documentation, as does the Company's commitment to work with Hertfordshire Police and adapt the plan to local Policing.

Summary

The UK is currently at the forefront in the development of accessible and functional digital furniture and the provision of accessible communication apparatus that provides more than simply a means to make voice calls. Many local authorities recognise the value such development can provide, which complement and support their own public service provision and delivery. This proposal is modest in scale and extent, and sensitive to the location to ensure the units integrate successfully into the urban fabric of Reading Town Centre. The installation of the Communication Hubs will help create an active, vibrant and connected town centre that is supported by local and national planning policy.

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

Yours sincerely,

T. Collins

Tom Collins

Town Planner

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JCDecaux UK Limited

Appendix A	Hub Unit Specification
Appendix B	Community Channel
Appendix C	Sustainability
Appendix D	Reinstatement
Appendix E	Management Plan
Appendix F	Community Heart Beat Trust