

16th August 2023

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

Haringey Council Planning Service
6th Floor River Park House
225 High Road
Wood Green
London N22 8HQ

Dear Sir/Madam,

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

Proposal: **The Installation Communication Hubs with Integrated Defibrillator and Advertisement Display**

Locations: **Site 1 o/s 64 High Road N22 6HL**
 Site 2 o/s 21 High Road N22 6BH
 Site 3 o/s Coliseum Apartments Green Lanes N15 0RX
 Site 4 o/s Anna House 214-218 High Road, N15 5BT
 Site 5 o/s 230 High Road N15 4AJ

Please find enclosed applications for advertisement consent (AC) and planning permission (PP) for the installation and extension to the network of connected Communication Hub units at various locations in the London Borough of Haringey.

These proposals are part of a Nationwide programme to update and replace the older style of telephone kiosks with modern multifunctional freestanding communication devices called a Hub unit. To date we have installed five Hubs in the Borough, the benefits of which are being experienced by residents, with a further five planned for the above locations. The Hub unit offers the public free calls to landlines and a range of additional connective functions as outlined in the specification document at **Appendix A**. The reverse of the Hub unit is a single integrated advertising display, which funds the installation and maintenance of the network.

Background to the Application

JCDecaux is best known as an outdoor advertising Company that specializes in visual forms of communication. Through the acquisition of a telecommunication Company called Infocus in 2018 our interests have extended into other forms of communication. By combining these two elements the Company's aim is to be able to offer a range of formats that deliver high-quality, reliable and innovative communication options. With advances in screen technology and the growth in digital media, new and innovative forms of communication platforms continue to emerge that go beyond the traditional role of the public telephone box. The development of the Hub Unit is the means

through which this vision is being realized, by creating a product that redefines the perception and role of a public phone service.

It is recognized that all development needs to be carefully managed to avoid creating a plethora of discordant and unsympathetic furniture that detract from, rather than enhance, the look and quality of the street. The Company's guiding principle is to ensure our furniture enhances place and assists in improving the public realm through design, innovation, and functionality. The integral advertising screen will serve to promote and strengthen the retail function within the Boroughs primary retail core and to draw in visitors and shoppers alike.



The Hub unit embodies the principles of good design, sustainability, and innovation in product development. These attributes are the main features of JCDecaux 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.

The applicant's own aspiration aligns with the Council's vision to become London's leading digital Boroughs, which is expressed through the Digital Strategy (DS). The essential role of technology in the social and economic wellbeing of the Borough and life of residents is recognised. Technology is a valuable tool in ensuring communities stay connected and in providing inclusive access to Council services and online provisions. The purpose of the digital strategy, which we believe supports the Hub

JCDecaux UK Limited

Registered Office: 991 Great West Road – Brentford – Middlesex – TW8 9DN

Registered in England and Wales Registration Number: 1679670

Telephone : +44 (0)20 8326 7777

Fax: +44 (0)20 8326 7775 www.jcdecaux.com

development, is to harness the potential of digital technology and use of smart data to target funding and establishing open channels of communication.

The Proposal

The Proposal strikes the balance between providing the right number of connected Hub units whilst ensuring the scale of development does not harm important interests. We recognize that all development must be carefully managed to avoid creating a plethora of discordant and unsympathetic furniture that detract from, rather than enhance, the look and quality of the street. This current set of applications concern five locations around Wood Green and Seven Sisters, South Tottenham which together with the five existing units will deliver a limited distribution of units in the busiest parts of the Borough where people will see and use the devices.

The context found at each site is predominantly retail at street level and provides the appropriate setting and scale of buildings where this type of furniture would appear consonant. The Hub units are connected across the Borough and include access to a range of services that support 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 Priorities¹ 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.

Details of the Hub Unit

The Hub unit is a modern interpretation of the public phone box that enables voice calls and additional connective functions that include free Wi-Fi with a 45m range, a 32-inch wayfinding touch screen, access to local webpages, USB and wireless charger and a publicly accessible defibrillator. The unit is 2.6m tall and 1.3m wide and sits on two legs that occupy an area of pavement of less than 0.3m². The advertising display is an integral part of the unit design and is equal in size to a standard 6 sheet size display, which is the type typically found on street furniture and attached to bus shelters across the Borough. The Hub unit will extend the existing digital connections across the Borough without cost to the public or Council. The application document includes a Management Plan², which was formulated with the advice of the Metropolitan Police's Design Out Crime Officer (DOCO), to ensure the functions provided by the Hub are not misused. As a result of the consultation the service

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

² **APPENDIX E Management Plan**

exclude free calls to mobile and unregistered lines. All other calls to registered numbers are free and no money or payments are accepted.



INSTALLED HUB UNIT IN TWICKENHAM

The Hub unit has undergone rigorous testing in extreme conditions and has a 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 gain access. The power of the public screen is recognised as an effective means of reaching out and interacting with the public. The display screen on the reverse of the Hub unit is therefore available to local authorities and the Police service for crime prevention and community messaging. Greater Manchester Police have extensively used the screens within the city centre to raise awareness of operation Valiant.

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 maximum 300Cdm² at nighttime⁴. The advertisement screen will show illuminated

JCDecaux UK Limited

Registered Office: 991 Great West Road – Brentford – Middlesex – TW8 9DN

Registered in England and Wales Registration Number: 1679670

Telephone : +44 (0)20 8326 7777

Fax: +44 (0)20 8326 7775 www.jcdecaux.com

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%.



GREATER MANCHESTER POLICE PUBLIC AWARENESS CAMPAIGN 2022

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 to enable people to find their way around Haringey 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.

JCDecaux UK Limited

Registered Office: 991 Great West Road – Brentford – Middlesex – TW8 9DN

Registered in England and Wales Registration Number: 1679670

Telephone : +44 (0)20 8326 7777

Fax: +44 (0)20 8326 7775 www.jcdecaux.com

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

Use of Hub Services

The Hub units will help to make Haringey 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 work with the local authorities to implement a more restricted use policy for Hub units that are 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.

JCDecaux UK Limited

Registered Office: 991 Great West Road – Brentford – Middlesex – TW8 9DN
Registered in England and Wales Registration Number: 1679670
Telephone : +44 (0)20 8326 7777
Fax: +44 (0)20 8326 7775 www.jcdecaux.com

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 cooperation 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.

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 and Met Police, time on the screens will be made available 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 Sites

Five sites have been identified for the installation of the Hub units in N22 and N15. All sites share a similar backdrop of retail/commercial on main transport corridors. The position and locations for the Hub units have been surveyed to establish their suitability and ensure they are alongside the most travelled and active routes where people are most likely to see and use 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. Each location has been assessed in planning terms, mindful of the local context and character of the area. None of the locations are within or close to conservation areas or close enough to heritage asset as to affect setting. The safety assessment examined the proximity of the Hub unit to road junctions and crossings and areas where drivers need to take

JCDecaux UK Limited

Registered Office: 991 Great West Road – Brentford – Middlesex – TW8 9DN
Registered in England and Wales Registration Number: 1679670
Telephone : +44 (0)20 8326 7777
Fax: +44 (0)20 8326 7775 www.jcdecaux.com

special care and to ensure pavement widths were acceptable to accommodate the unit in line with TfL standards³.

Each of the Proposal sites are within busy urban settings with prominent retail activity so that the Hub unit would not look out of place. Within this setting the display of advertising imagery is commonplace and concomitant to the shopping activity in the Town Centre. The site locations all adjoin very busy, well-travelled footpaths, however the unit position close to the road edge would not impede pedestrian movement along the street.

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 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.”

³ APPENDIX D TfL Streetscape Guidance extract

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 Haringey 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

JCDecaux UK Limited

Registered Office: 991 Great West Road – Brentford – Middlesex – TW8 9DN

Registered in England and Wales Registration Number: 1679670

Telephone : +44 (0)20 8326 7777

Fax: +44 (0)20 8326 7775 www.jcdecaux.com

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.

Haringey Local Plan SPG Outdoor Advertisements

The Local Plan for Haringey includes the Development Management DPD adopted in July 2017. On public realm matters the DPD required all development to be built to a high standard that contributes to a safe and attractive environment. On telecommunication development there is a presumption in favour of development where, inter alia, the development does not have a significant adverse impact on amenity or the street scene and that where there is enough pavement width to accommodate equipment without obstructing pedestrians. The policy recognises the important role of communication infrastructure on the social and economic life of the Borough and is broadly supported, subject to controls to avoid proliferation. The policy aims not to restrict the provision but to minimize any adverse impact. IN busy areas the minimum footpath width of 1.5m may not be enough and therefore requires an

JCDecaux UK Limited

Registered Office: 991 Great West Road – Brentford – Middlesex – TW8 9DN
Registered in England and Wales Registration Number: 1679670
Telephone : +44 (0)20 8326 7777
Fax: +44 (0)20 8326 7775 www.jcdecaux.com

assessment of pedestrian volumes. The DPD broadly supports improved telecommunication and the development of inclusive accessibility for communities.

As to advertising, the document is similarly worded in terms of improving the quality of design and minimized impact of development on the locality. Further, the DPD reinforces the primacy of the Advertisement Regulations and the need to assess proposals in terms of the material factors. The material factors identified in Regulation 3 of the 2007 Regulations are amenity and public safety. The DPD states that consent for advertisements will only be permitted whether they do not harm amenity or compromise public safety, including aural amenity. Advertisements should be appropriate in scale to their surroundings and not appear overly bright. Advertising is to be confined to commercial areas and not clutter the street. In general terms the policy supports advertisements that relate well to their surroundings in terms of size, scale and siting, or to the building/structure to which they are attached. The current proposal is not in conflict with these aims.

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 worldfamous 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. The proposals within the Borough are confined to main transport routes and centres of retailing. The application sites are busy, mixed use thoroughfares with a pronounced commercial presence, with many large-scale commercial premises lining the street, together with other forms of roadside advertisements. Haringey 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, however none of them would be affected by the current set of proposals.

The scale of buildings and character of the areas where the Hub units will be located are varied, ranging from substantial commercial retail and office buildings to small scale shop premises. The proposed locations for the Hub units have been identified as sites where the addition of a roadside unit would have a negligible impact on the character and appearance of the surroundings. The design of the Hub unit is purposefully unassuming with the advertised area reduced to the same size of display that is found on the Council's roadside estate. The scale of display is appropriate to

JCDecaux UK Limited

Registered Office: 991 Great West Road – Brentford – Middlesex – TW8 9DN
Registered in England and Wales Registration Number: 1679670
Telephone : +44 (0)20 8326 7777
Fax: +44 (0)20 8326 7775 www.jcdecaux.com

the pedestrian environment and will be used to support the retail offering and provide a platform for community messaging, without overwhelming passers-by. The application site context are able to 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 are 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 a few will also be visible to drivers. The proposal sites have been chosen where the width of the available footpath is enough to accommodate the unit without obstruction or an unacceptable narrowing of the available pavement, in accordance with TfL guidance⁴. The prominence of the sites will provide ample opportunity for 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 for each location is overwhelmingly commercial, with brightly lit shop fronts and other premises forming the immediate backdrop and visual context.

For those sites visible to vehicular traffic the approaches are along roads 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

⁴ **APPENDIX D Management Plan**

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.

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 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.

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.

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 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

JCDecaux UK Limited

Registered Office: 991 Great West Road – Brentford – Middlesex – TW8 9DN
Registered in England and Wales Registration Number: 1679670
Telephone : +44 (0)20 8326 7777
Fax: +44 (0)20 8326 7775 www.jcdecaux.com

exemplary and have worked closely with other Highway Authorities in the UK to maintain a high standard of workmanship. Attached at **APPENDIX C** are examples of recent reinstatement works following the installation of a foundation for Hub units in Birmingham.

The Proposal is appropriate development that is consistent with both national and local policy on advertisement control, the development of reliable digital infrastructure and the creation of safer streets.

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 has been carefully designed to ensure the Hubs integrate successfully into the urban fabric of Haringey.

It is considered that the installation of the Hub units with integral displays is an appropriate form of development that will showcase the Borough as an attractive place to live, to work and visit. The development of visually attractive and functional smart furniture supports the ambition of a greener safer and connected Borough and 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 call me if there are any further matters on which you may need clarification.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Martin Stephens'.

Martin Stephens BA(Hons) Dip TP MRTPI

Director of Planning

T: 020 8326 7732

Email: martin.stephens@jcdecaux.com

JCDecaux UK Limited

Registered Office: 991 Great West Road – Brentford – Middlesex – TW8 9DN

Registered in England and Wales Registration Number: 1679670

Telephone : +44 (0)20 8326 7777

Fax: +44 (0)20 8326 7775 www.jcdecaux.com