

4th September 2024

**Out of Home
Media**

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Cameroon
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Costa Rica
Croatia
Czech Republic
Denmark
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El Salvador
Estonia
Eswatini
Finland
France
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Guatemala
Hungary
Honduras
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Luxembourg
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Norway
Oman
Panama
Peru
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Qatar
Russia
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Singapore
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South Africa
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Uruguay
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Zimbabwe

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

Our Ref: A02637

Dear Sir/Madam,

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

**Proposal: Illuminated Advertisement Display
Site: Hub Unit o/s 27F The Quadrant Richmond**

Please find enclosed an application for consent (AC) to display an advertisement on a Communication Hub at the above location.

This application is a resubmission of an earlier proposal which was refused by the Council under your references 23/0481/FUL and 23/0482/ADV in April 2023 and subsequently granted on appeal on the 12th of March 2024, copy attached as **Appendix A**. The appeal decision related to the application for planning permission to replace the older style of telephone kiosks with a modern multifunctional freestanding communication device called a Hub unit. The corresponding advertisement appeal was submitted out of time, and therefore this application is for the advertising element of the permitted Hub unit. The site plan and unit details can be found at **Appendix B**.

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 appeal site is considered the type of location where this type of development would be acceptable and not result in harm to amenity or safety. I am supported in this view by the Inspectors decision notice in which he states in para 13.

“...it is this sort of location where an on-street communication hub with digital advertising might reasonably be expected and where the free services it offers are the most useful, not least given the large numbers of people in the vicinity including visitors arriving by rail.”

The specification of the Hub Unit and advertisement display is appended as **Appendix B** and provides the detail and dimensions of the Hub. The unit stands at 2.63m in height and 1.33m wide and occupies 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. All external facing elements have been treated with a nanotech surface treatment to enable easy removal of stickers and/or spray paint. 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 method of display on the screen is latest high-definition LCD screen with the luminance level adjusted via an inbuilt light sensor and limited to a maximum 300Cdm² at nighttime¹. The advertisement screen will show illuminated 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., thereby 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.

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 D**. 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.²

Development Detail

This Proposal will see the removal of one of the older style, single function, phone boxes at Site A, which will be replaced with a Hub unit, that will not only improve the look of the furniture but be able to offer real public benefits beyond free phone calls. Planning permission has already been approved for Hub unit, the same as the four Hub units operating in Twickenham.

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 and community groups 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.

¹ The maximum night-time limit for advertisements under 10m² in City Centres as recommended by the Institute of Lighting Professionals

² **Appendix D** Sustainability Aims and Objectives

The Application Sites

The proposal on the Quadrant is by the station, where there currently exists a kiosk that will be replaced by the Hub unit. The site location outside Richmond Station is on a busy thoroughfare and ideally located to where people are most likely to see and use the facilities provided by the Hub unit. Most of the town centre falls within the Central Richmond Conservation Area and there are a number of important historic buildings within the central area that are either statutory listed or locally recognised and valued. The character profile and Inspectors decision however recognised the different character of the area around the application site and that it is considered appropriate for this form of roadside display.

Policy Considerations

National Guidance

The applications are submitted under the provisions of the Advertisement Regulations and seeks consent to display an advertisement on the rear of the permitted Hub Unit.

The **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

The proposal is supported by the policy aims of the NPPF.

³ Para 136

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.”

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 expected however that additional special conditions outlined in **Appendix C** would be necessary and consistent with consents granted by the Council for the same form of development in the Borough. These conditions represent 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.

Summary

In light of the recent appeal decision, the advertisement proposal is consistent with both national and local policy on advertisement control and acceptable as an addition to the permitted Hub unit at the site.

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,



Martin Stephens BA(Hons) Dip TP MRTPI

Director of Planning

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Email: martin.stephens@jcdecaux.com

LONDON BOROUGH OF RICHMOND COMMUNICATION HUB PROPOSALS

SUGGESTED CONDITIONS and REASONS

Advertisement Consent

1. No advertisement is to be displayed without the permission of the owner of the site or any other person with an interest in the site entitled to grant permission.

Reason: - As required by regulation 2(1) and Schedule 2 of the Town & Country Planning (Control of Advertisements) (England) Regulations 2007.

2. No advertisement shall be sited or displayed so as to
 - a. endanger persons using any highway, railway, waterway, dock, harbour or aerodrome (civil or military);
 - b. obscure, or hinder the ready interpretation of any traffic sign, railway signal or aid to navigation by water or air; or
 - c. hinder the operation of any device used for the purpose of security or surveillance or for measuring the speed of any vehicle

Reason: - As required by regulation 2(1) and Schedule 2 of the Town & Country Planning (Control of Advertisements) (England) Regulations 2007.

3. Any advertisement displayed, and any site used for the display of advertisements, shall be maintained in a condition that does not impair the visual amenity of the site.

Reason: - As required by regulation 2(1) and Schedule 2 of the Town & Country Planning (Control of Advertisements) (England) Regulations 2007.

4. Any structure erected or used principally for the purpose of displaying advertisements shall be maintained in a safe condition.

Reason: - As required by regulation 2(1) and Schedule 2 of the Town & Country Planning (Control of Advertisements) (England) Regulations 2007.

5. Where an advertisement is required under these Regulations to be removed, the site shall be left in a condition that does not endanger the public or impair visual amenity.

Reason: - As required by regulation 2(1) and Schedule 2 of the Town & Country Planning (Control of Advertisements) (England) Regulations 2007.

6. No visual effects of any kind to be permitted to accompany the transition between any two successive messages. The replacement image must not incorporate any fading, swiping or other animated transitional method.

Reason: - To ensure that the advertisement does not create a distraction to pedestrian or vehicular traffic and therefore cause a hazard to highway safety.

7. The minimum time between successive displayed images shall be 10 seconds.

Reason: - To ensure that the advertisement does not create a distraction to pedestrian or vehicular traffic and therefore cause a hazard to highway safety.

8. The intensity of the illuminance of the advertisement shall be no greater than 300Cdm² during the hours of darkness.

Reason: - To ensure that the advertisement does not create a distraction to pedestrian or vehicular traffic or harm local amenity through too bright a display.

9. The development hereby approved shall be implemented in accordance with the details submitted with the application and shown on drawings ('the approved plans')

Reason: - In order to define the permission in accordance with Policy and the National Planning Policy Framework.

10. Any change in advertisement display shall be instantaneous.

Reason: - To ensure that the advertisement does not create a distraction to pedestrian or vehicular traffic or harm local amenity through too bright a display.

11. The advertising screen shall be switched off between the hours of 11:59pm and 6:00am

Reason: - In order to define the permission in accordance with Policy and the National Planning Policy Framework.