

**Bury Council
Planning Control
Town Hall
Knowsley Street
Bury
Lancashire
BL9 0SW**

16 January 2024

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

**Re: The Installation of Three Advertised Communication Hub Units
with Defibrillators**

Application Sites:

- 1. o/s 46 Haymarket, Bury BL9 0BX**
- 2. o/s 61 The Rock, Bury BL9 0BN**
- 3. o/s Mill Gate Shopping Centre, Union Street, Bury BL9 0NY**

I write further to our correspondence in October 2023 with Claire Booth to provide background and explain our plans. We have revised the originally proposed network following our pre-application advice, with three sites being withdrawn. This scheme has been developed through the Mayor's Office, to create a network of Communication Hubs with accessible defibrillators across the nine Greater Manchester Boroughs, as that established within Manchester City centre.

This letter is submitted with applications for advertisement consent (AC) and planning permission (PP) for the installation of the Communication Hubs, linked to a wider network across the Metropolitan area. The set of applications relate to three sites, as identified on the map of central Bury at Appendix A. The Hub Unit, in addition to free calls to landlines, offers a range of additional connective functions that include free Wi-Fi, a 32-inch touch screen to enable wayfinding, direct access to local webpages, a publicly accessible defibrillator and both USB and wireless device charging capabilities. The communication apparatus includes a telephony element together with an advertised face, which is why applications are submitted for both PP and AC.

Background

By way of background on this proposal, JCDecaux is best known as an outdoor advertising Company that specialises in the visual medium. Through the partnership with the telecommunication Company In Focus Public Networks our interests have extended into other forms of communication. JCDecaux acquired In Focus Networks in 2018 and with it a network of old-style enclosed call boxes. Over the last few years we have



been systematically working through the estate to rationalise and replace the call boxes with modern multifunctional Hub units, of which there are now 160 in the UK. What is unique about our Hub unit is the inclusion of a publicly accessible defibrillator as a standard feature in the unit design. We established a network in Manchester City centre last year, which has proved very successful, not only through our collaboration with the Great Manchester Police who regularly use the advertisement screens to promote local campaigns, but in raising the profile and importance of adequate provision of life saving

defibrillators across Bury. The Hub units have also proved useful in promoting the Mayor's homelessness charity campaign by providing the means for the public to make donations using a QR code on screen. Following the successful installation of the Hub estate, we were approached by the Mayor's office to help be part of the 'heart-safe' campaign for Greater Manchester and extend the defibrillator provision beyond the City to include all nine Metropolitan Borough's.

The approach we made to your Council last year we also made to other Metropolitan Borough's to seek support for this initiative. Following the meeting last year, we have been surveying the centre of Bury to identify suitable locations and identified three potential sites in the busiest and most suitable thoroughfares where people are most likely to see and use the Hub facilities offered. We recognise that there may be areas in the Borough where defibrillators are considered necessary, but which are not within established retail/commercial areas and therefore a Hub unit may not be appropriate. As this project is driven by the Mayors 'heart-safe' campaign with the aim of extending the provision of defibrillators, as part of this proposal, JCDecaux will supply up to three additional solo defibrillator units for the Council to determine the most suitable locations.

The concept of advertised telephone boxes will not be unfamiliar to you as there are several examples of this type of development in Bury, other metropolitan Boroughs and Manchester City centre. Other operators include New World Payphones, an arm of Clear Channel, and of course British Telecom's InLink unit in partnership with Global Outdoor. Our estate is modest by comparison with these two operators, as is our ambition to provide the appropriate level of cover without flooding the streets with unnecessary furniture that offers little to the public.



Hub Unit on Piccadilly Manchester

This letter therefore sets out the details of the proposals, which seeks approval for a limited number of units to create a central network of connected Hub units that offer a range of interactive functions that are available free of charge to the public. The details of the Communication Hub unit is enclosed at **Appendices B and C** and the proposed locations shown on the map in **Appendix A**.

Hub Unit Features

Common to all communication providers is an advertised element, from which is derived the revenue to pay for the provision and maintenance of the equipment and support any services provided. Our Hub unit is the only unit that incorporates a single side of advertising rather than having it featuring on both sides of the structure. This enables us to dedicate the front of the unit solely to public use, as a purposefully designed benefit, rather than an afterthought.



The available benefits include free calls to landlines¹ and charities, free wi-fi and device charging, wayfinding via the 32” touchscreen and instant access to the emergency services when needed. However, one of the most important features is the inbuilt defibrillator, which is accessible 24 hours a day. Since 2019 JCDecaux has worked in partnership with Community

¹ Calls to Mobile Numbers prohibited under the adopted Management Plan

Heartbeat Trust, a registered charity that promotes greater public access to defibrillators in public spaces. Each Hub unit is equipped with a defibrillator as standard and local training is provided by the Community Heartbeat Trust, funded by JCDecaux, to ensure that the equipment can be quickly deployed in an emergency. We currently have 160 Hub units nationwide and the defibrillators have been activated on over 400 occasions.

The detail in **Appendices B** and **C** 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 airly²; 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.



GM Police Crime Awareness Campaign in Manchester City Centre

²<https://airly.org/en/>

The traditional role of the phone box is ill equipped for the modern digital environment. The multifunctional Hub unit has been designed to bring this public service up to date and present the next generation of communication provision that gives more to the public and can contribute to the vitality and vibrancy of city centres.

In light of changes in 2019 both planning permission and advertisement consent is now required for this form of development, therefore now, more than ever, an Operator needs to demonstrate that what it offers will benefit the wider public and local community.

Although not an exhaustive set of criteria, I list below some of the important considerations in our proposals.

- **Need** – The NPPF confirms that the need for this type of communication apparatus is not a material consideration. However, evidence from installed Hub units in the UK clearly demonstrates not only the demand for phone functions, but the active use of the additional functions provided. The Hub unit is not limited to voice calls but includes access to a range of other facilities that are free for public use. The defibrillators on the Hub network have been used over 400 times in two years. The share of time of the display screens together with the dedicated local area specific content on the touchscreen provides a platform for people to engage with public bodies and promote public awareness. The document appended as **APPENDIX D** shows the uses figures for the existing 17 Hub units in the centre of Manchester for 2022. Despite any natural decline in use due to the covid 19 epidemic, the figures show a healthy and active use of the interactive unit.

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, making it the ideal 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, however the early use of a defibrillator can triple the chances of someone surviving such an

attack. Each Hub unit is equipped with an easy to use defibrillator provided and maintained by JCDecaux and added to the register of available devices in the Borough. How to activate and use to the device can be displayed on screen 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.

- **Design** – The Hub unit is based on the Forum design by Fosters and partners and is a familiar scale of furniture that is found in urban areas as it is comparable to the size of advertising on bus shelters, for example. The design is purposefully understated in a dark grey or black colour to match other functional furniture within Bury and is of robust construction and fully accessible. The units are run on 100 renewable energy and cleaned by rainwater.
- **Unit Number and Clutter** – The proposal is limited in scope to three new locations, which is a suitable scale of network for the size of Bury. We have identified sites to fit the distribution and where possible sited them on footpaths that are relatively clear of other similar forms of furniture.
- **Safety** – The experience of other Operators across the UK has raised real concerns over the misuse of a free to use public service. The design and operation of the Hub unit has been formulated with the support of the Greater Manchester Police and Met Police Design Out Crime Unit resulting in the adoption of a Management Plan that ensures the use of the units is closely monitored and managed to prevent abuse.

JCDecaux is committed to high quality, functional, innovative and sustainable furniture which is applied to all development. The communication Hub is a new product for the Company, but it too embodies these principles and was as a result shortlisted for the IEMA 2020 Awards. The IEMA Awards recognises Companies, teams and organizations that have developed innovative products to deal with urban challenges. The Hub unit was shortlisted in two categories; on the integration of sustainability principles to the design; and in providing an inclusive accessible platform for

social and community engagement. These innovations are implemented against the backdrop of energy savings that recognises the climate emergency. All Hub screens are powered by Green energy and lit using high-capacity batteries, powered by solar energy.

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 advertisement screen will show illuminated static images that automatic change by means of a remote server. The light sensor will control lighting levels automatically during the day and be able to adjust levels to reflect a change in sunrise and sunset times from summer to winter and environmental conditions. Should the unit malfunction the screen will switch off and automatically alert JCDecaux's dedicated digital team of the fault and schedule a repair. 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 touchpad screen will default to a map of Bury for easy wayfinding and the screen can include shortcuts to the most often used apps and links direct to local 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.

Finally, sustainability is an important element of the Company's approach to development from initial design, product and material sourcing to energy use. In 2019 the Company joined RE100, a global leadership initiative for companies committed to 100% renewable electricity. The Company's objective is to source 100% of its electricity consumption from renewable electricity this year.

The Proposal Sites

The proposal for Bury is for three units as illustrated in **Appendix A**. We are open to discussion through the application process on the precise locations should any of the identified sites be considered unsuitable for local amenity or highway safety reasons. The site locations sit within established retail streets and share comparable backdrops of retail/commercial activity. The sites are considered suitable locations for this type of development, based on the surrounding character and building scale.

Each proposal site has been assessed on planning merits, mindful of the existing furniture and local context. The proposal sites are located on the streets surrounding the Mill Gate Shopping Centre and along The Rock, which is a linear route containing active retail frontages and represents one of the busiest routes in Bury. Forming part of the established retail core in the centre, Market Street and The Rock already exhibit high levels of advertising imagery as a characteristic feature, therefore the use of the apparatus with integral advertising would not appear inappropriate or unusual. Although the site locations are busy, the positioning of the units would not impede the pedestrian desire routes due to the generous pavement widths. The safety assessment examined the proximity to road junctions and crossings and the pavement widths in line with established standards. A network of three locations within the centre would deliver a limited and rational distribution in areas where people are most likely to see and use the Hub unit.

Site 1 - Pavement outside 46 Haymarket

This site is located on Haymarket Street at the western entrance to the Mill Gate Shopping Centre within the centre of Bury. The open area of pavement will acceptably accommodate the proposed Communication Hub which would be positioned within a similar line to the existing cycle hoops, litter bin, and trees on the 9.4m wide section of pavement. The prominent character within the locality is commercial, as a result of the numerous dining and retail outlets at ground floor level surrounding the central shopping centre in Bury. The proposed Communication Hub will not conflict with pedestrian desire lines and allow for the public to utilise the many inclusive benefits the Hub can offer in a busy location.

The application site is located within the Bury Town Centre Conservation Area that is characterised by its mix of commercial and historic civic buildings. The Met entertainment venue is located 35m north of the proposed site within Derby Hall, a Grade II listed building. The Kay Monument is another Grade II listed asset 70m south of the proposed site, where the presence of two free standing digital advertisements has been noted (LPA Ref: 64406 & 64407). It is not expected that the introduction of the proposed communication hub to the retail setting of Haymarket Street will detract from the amenity of the listed assets due to the trees in the area providing screens that obscure views of the displays from the assets. The proposed Hub unit in this location would complement the retail experience and will not result in harm to the visual amenity or present an obstruction to pedestrian movements.

Site 2 - Pavement outside 61 The Rock

The proposed site is situated on the pedestrianised retail street The Rock, at its junction with Tithebarn Street in Bury town centre. The site is proposed on the 12m wide section of pavement aligned with the existing street lighting features and bollards. The Rock is lined within numerous retail properties and a number of modern facades and provides a link between Bury's historical centre and modern retail destinations. The Rock thoroughfare currently contains a series of five double-sided, internally illuminated advertising hoardings positioned off-center along the pedestrianised retail street, with a sixth located adjacent to the proposed Communication Hub site outside of 61 The Rock. The proposed Communication Hub will not conflict with pedestrian desire lines and allow for the public to utilise the many inclusive benefits the Hub can offer in a busy location. The site falls outside a Conservation Area and given the character of the area and numerous retail outlets; the proposed Hub is able to fit comfortably within the streetscape. The proposed Hub unit in this location would complement the retail experience and will not result in harm to the visual amenity or present an obstruction to pedestrian movements.

Site 3 - Pavement outside Mill Gate Shopping Centre

The final site as part of the applications within Bury is located on Union Street at the northern entrance to the Mill Gate Shopping Centre. The proposed communication hub is situated within the 9.1m wide pedestrianised section of pavement travelling south from the retail focused thoroughfare The Rock. The unit is located in the middle of an open pavement space, allowing sufficient room for pedestrians to continue their most efficient walking route. The remaining footpath width is wide enough on either side to accommodate the introduction of a Communication Hub without compromising pedestrian movement, even at busy times. The Mill Gate Shopping Centre building, opened in 1995, directly adjacent south is a modern and relatively unattractive retail building, however while unlisted the RBS building to the west does have recognised architectural merit. There are no historically designated buildings nearby nor does the site lie within a Conservation Area. Overall, the proposed Hub is unlikely to result in harm to the visual amenity of the centre or present an obstruction to pedestrian movements.

Material Considerations

The proposal requires both Planning Permission for the physical elements and communication apparatus and Advertisement Consent for the display of advertisement on the rear of the Hub Unit. In respect of the advertisement element the Regulations dictate and limit the scope of the considerations to matters of amenity and safety, whereas the communication element is considered under Council's plan policies.

Policy Considerations

National Guidance

National Planning Policy Framework (NPPF) December 2023.

Part 6 Building a strong, competitive economy

Part 10 Supporting high-quality communications

Part 12 Achieving well-designed and beautiful places

Planning Practice Guidance (“PPG”)

- **Advertisements July 2019**

- Section 7 Public Safety Considerations

- Section 8 Amenity Considerations

- **Healthy and Safe Communities Aug 2022**

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.

The National Planning Policy Framework December 2023 (**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.”

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:

“Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. 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 (as these connections will, in almost all cases, provide the optimum solution).”

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 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.”

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 Hub unit 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.”

Amenity

The Company is a passionate supporter of good design and is keen to ensure its street furniture contributes to improving the quality of the streets and in making them safer, cared for and attractive places. The streets adjoining the proposal sites are busy, mixed-use thoroughfares with a pronounced commercial presence, with many large-scale commercial premises lining the streets, that also include advertising imagery. When introducing any additional item of street furniture it is recognised that development needs to be carefully considered, thoughtful and respectful of the local context.

In this proposal we have been mindful of these considerations and feel that a limited network of Hub units in locations where the scale of buildings and character of the areas are appropriate and unlikely to lead to harm to the appearance or character of the street setting. The design of the Hub unit and scale of advertisement display is appropriate to the pedestrian environment without overwhelming passers-by. The proposal sites are confined to a tight network in the busiest and most vibrant parts of the retail centre of Bury which is a vibrant and busy route where the immediate local context could support this type of modern structure. Overall, the Proposal would accord with policy guidance and is considered not to harm local visual amenity.

Public Safety

The advertisements affixed to the Hub units will be prominently positioned on the public footpath to be readily visible. The main audience will be pedestrians and only one would be visible to drivers. The proposal sites have been chosen where the width of the available footpath is sufficient to accommodate the unit without obstruction or an unacceptable narrowing of the available pavement. The units will be seen alongside busy active street frontages and so it is doubtful that anyone would view this type of advertised unit in this context as unusual or alien.

For the sites that would be visible to vehicular traffic, the approach to the sites 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 proposal

site he/she will have travelled through the centre of Bury and would have passed many retail premises and seen many other type of 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. Views of the adverts attached to the Hub units from passing vehicles would generally be fleeting in nature. Those viewed from across streets would be filtered by traffic or pedestrians and the adverts could only be seen from a few vantage points. The proposed unit would not appear wholly incongruous or intrusive in this context 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 300Cdm² 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 at **APPENDIX E** 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 the 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. The proposed Hub network has been thoughtfully considered to ensure it will successfully integrate into the urban fabric of Bury.

The proposed unit is of a high quality of design and the locations are confined to commercial areas that are appropriate for this type of advertised structure. The design and functions of the Hub unit will contribute to raising the quality standard of furniture and the appearance of the public realm.

I trust that the above information and Appendices provide sufficient information on our plans and is enough for you to consider this proposal. I am happy to meet if needs be at your offices or ours to discuss the finer detail.

I look forward to hearing from you.

Yours sincerely,



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JCDecaux UK