



Planning Supporting Statement

Our Ref.	PSW-104
Street Hub Address	Footpath to the east side of Bury New Road (adjacent to 48 Bury New Road), Prestwich
Postcode	M25 0JU
National Grid Reference	E: 382069 N: 402533
Project Type	New
Conservation Area	N/A
Statutory Listed Buildings	N/A

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Rev	Originator	Approved	Date
0	Name	Name	Day/Month/Year
1		Martin Brown	December 2024
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1.0 Introduction

1.1 Overview

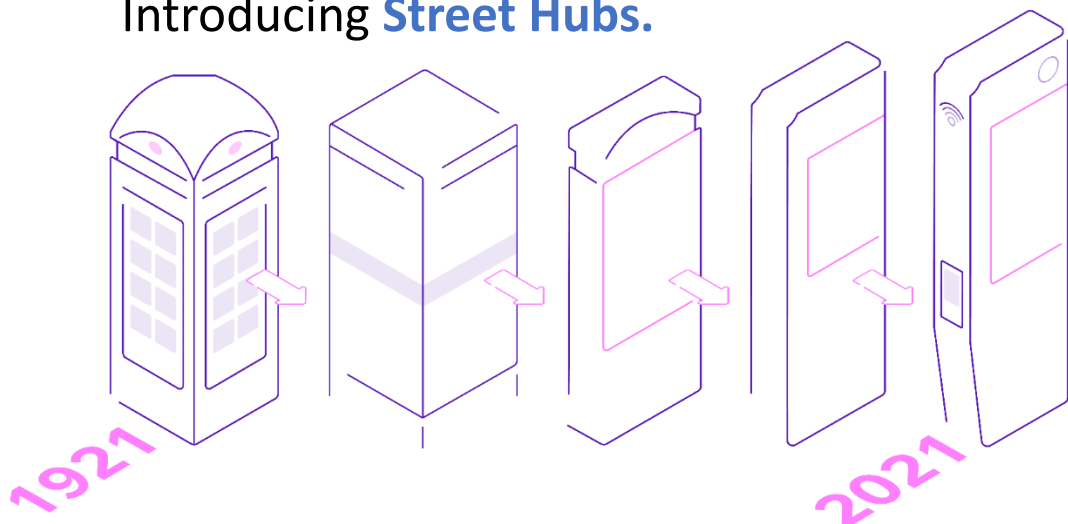
This Supporting Statement has been prepared by Telent on behalf of BT Group plc. The statement has been prepared in support of the planning application made to the Council for the installation of a 'Street Hub' and 2No. digital illuminated screens (one to each side of the unit) at the Footpath to the east side of Bury New Road (adjacent to 48 Bury New Road), Prestwich (E: 382069 N: 402533). This application is made under the Town and Country Planning (Development Management Procedure) (England) Regulations 2015 and express advertisement consent under the Town and Country Planning (Control of Advertisement (England) Regulations 2007. The right to install, operate and maintain communication apparatus is granted through Section 106 of the Communication Act 2003, due to BT's right as a Code System Operator.

The statement sets out the most relevant considerations in respect of the proposed development. Considerations of design and layout are informed by the context, having regard not just to any immediate neighbouring buildings but the immediate and wider townscape. The local pattern of streets and spaces, building traditions and materials all help to determine the character and identity of the development.

1.2 Purpose of Street Hubs

2021 marked the 100th anniversary of the original K1 kiosk. Public connectivity moved on with the deployment of InLink units first launched in 2017, and now, BT are further updating and evolving the payphone estate to better serve today's digitally connected converged-media society through the new improved BT Street Hub.

Introducing **Street Hubs**.



In 2017, BT started working as part of an exclusive partnership with InLinkUK to ensure communities in urban areas throughout the United Kingdom are well-served in the digital age through the roll out of 'InLink' units. These were developed and deployed

to replace and rationalize the existing network of payphones. A total of 494 InLink structures were rolled out in 23 cities throughout the U.K. offering 1Gbps free public Wi-Fi, free UK calls, USB charging, an emergency services button and a range of other digital services for those in the vicinity. HD displays on each side of the unit are used to carry advertising, which helped to fund the units, but the screens also allow Councils 5% of free screen time on each Street Hub unit annually to promote and educate, equivalent to 876 hours per unit or 438 hours per screen. This content would be scheduled and (where needed) developed in partnership with BT and Global, and can tell residents and visitors about local services, local events and news, as well as warnings and public notices.

Through collaboration with councils, BT helped in creating a service that revolutionized streetscapes and helped in providing a connected city solution that delivers the fastest and most robust free public Wi-Fi service in the UK. Councils across the UK have used the InLink units to meet key challenges head-on, upgrading local infrastructure, tackling the digital divide, and freeing the high street from unnecessary furniture.

Unfortunately, InLinkUK (who were supplying the units to BT within the partnership) went into administration in 2019, and, as such, the InLink product is no longer available. Since then, BT have been working on a new and improved unit - the 'Street Hub'. The Street Hub has all the existing benefits of the previous InLink unit, but has improved Wi-Fi range, environmental sensors, insight counting and small cell mobile connectivity. This addition of the 5G small cells to Street Hubs is very much in line with current UK Government's guidance on communications infrastructure and the National Infrastructure Strategy. Consequently, when installed, residents, local businesses and visitors will get a faster, more reliable connection for calls and internet access.

BT are continuing to push public connectivity forward with the move to Street Hubs – a sleek, modern answer to the demands of a digitally connected, converged-media society. To this end, BT have made great progress so far, with over 950 Street Hub units live across the UK. Local Authorities across the country use Streets Hubs to meet key challenges head-on such as upgrading local infrastructure, tackling the digital divide, and freeing the high street from unnecessary furniture.

With Street Hubs, BT are further transforming the payphone estate by making streets smarter, with ultrafast Wi-Fi, public messaging, and better mobile connectivity. We are making them safer with ready emergency services. Furthermore, BT are making them more sustainable, with sensors allowing for 'smart city' planning and reduced street clutter.

These new units will be monitored 24/7, with weekly inspections and a minimum of bi-weekly cleaning services to keep the unit to a high standard of finish within the existing streetscape. All units will be fitted with a direct 999 call button to aid in the efficiency of operations of the emergency services, with emergency (i.e., Police) awareness messaging shown via their advertising screens on either side of the unit. Furthermore, Street Hubs are powered by 100% renewable carbon-free energy, making them sustainable and durable for years to come.

In 2021, former BT head of street, James Browne, said:

“Street Hubs form part of BT’s plan to transform the UK’s streets with a digital communications service designed for the 21st Century.

I’m really excited that we’re now evolving the service even further with a newly designed Street Hub 2.0 unit which is more sustainable while delivering free public Wi-fi services and improved 4G/5G mobile coverage to local communities.

The free digital services provided by our Street Hub units can play an important role in helping to revive the UK’s high streets following the pandemic.

We are working closely with local councils and communities to introduce the new units to more parts of the country, enhancing the UK’s future digital infrastructure, and bringing benefits to residents, businesses and tourists alike.”

1.3 The Importance of Mobile Connectivity

The ability to access mobile data and voice services is an integral part of modern life. Mobile devices are relied upon by consumers and businesses. Mobile connectivity is no longer seen as a luxury: the ability to make calls, access the internet and receive e-mail and text is seen as a necessity. Businesses, large and small, need mobile connectivity to operate effectively and to compete in an increasingly global market. In an emergency, the public rely upon mobile devices to call for help and the emergency services rely upon mobile services to respond.

1.4 UK Government Policy on Mobile Infrastructure Deployment

The UK government has identified the need for greater investment in mobile infrastructure to increase the widespread availability and capacity of mobile voice and data networks.

“The Government acknowledges that there has been a profound shift over the last decade in the way citizens approach and access digital communications. What was once seen as a luxury is now a basic need, and people expect to have access to fast broadband at home, irrespective of where they live, and use their mobile devices anywhere they go”. DCMS, May 2016.

The last few years have seen a number of UK-wide initiatives to improve coverage including:

- Coverage commitments in the 4G LTE spectrum awarded to Telefonica O₂ (February 2013) to deliver mobile broadband with 98% indoor premises coverage by the end of 2017
- National commitment by all four MNOs (December 2014) to deliver 90% geographic coverage by 2017
- Mobile Infrastructure Project (MIP) – investment by DCMS of up to £150m (to March 2016) in towers to deliver connectivity in complete mobile not-spots.

- Changes to the Permitted Development rights afforded to communications code operators (such as WIG) to allow new networks to be rolled-out more efficiently.
- Changes to the Electronic Communications to Code (December 2017) to allow mobile operators to more easily roll-out new communications infrastructure.

Digital connectivity in 2024 is now considered to be a utility, and modern life is increasingly impossible without it. Connectivity drives productivity and innovation and is the physical underpinning of a digital nation. Being connected is fundamental to the success in our modern world and Street Hub provides a cost-free way for communities to get online and take advantage of available opportunities. The Government has committed that every individual and every business should have the skills and confidence to seize the opportunities of digital technology and have easy access to high-quality internet wherever they live, work, travel or learn.

1.5 National Support for Modern Communications

There is significant UK Government support for the delivery of 5G, particularly as this new connectivity will be a step change from earlier generations of mobile connectivity and will be critical to economic growth and sustainable communities. In the coming years, 5G mobile connectivity will underpin the UK Digital Economy and bring significant social, economic and sustainability benefits of advanced modern connectivity. It is essential that the planning system looks to support and facilitate 5G infrastructure improvements, such as the small cell capability of Street Hubs, to meet the Government's Digital Strategy. In addition, modern connectivity, such as 5G, will be essential to help the Government meet its wider sustainability and climate change targets.

Published in November 2020, the Government acknowledges in its National Infrastructure Strategy that investment in our infrastructure is critical as the UK seeks to recover from the Covid-19 pandemic. The Strategy puts innovation and new technology at its heart, in which the BT Street Hub is at the forefront of this technological revolution. The Government's ambition is to support fast and reliable digital connectivity that can deliver economic, social and well-being benefits because new technologies have enormous potential to improve the environment and the daily lives of people across the UK. The BT Street Hub can contribute to this with its suite of features, including Wi-Fi and small 5G cells capabilities, air monitoring and much more.

2.0 Proposed Development

2.1 Site and Proposed Development

The application site comprises a wide section of pedestrian footpath to the east side of Bury New Road, adjacent to number 48 Bury New Road and just before the corner of Bury New Road/King's Road. The immediate street scene at this point is that of a commercial context, typical of a High Street context with rows of commercial/retail premises with residential above. This general streetscene context continues to the north and south, and to the north there is large commercial building to the east side of the road with a petrol station opposite to the west side of the road. The street furniture around the area consists mainly of streetlamps, road signs/lights, telecommunication cabinets, bins, bus stops and free standing advertisements.

The proposal would see the installation of a single Street Hub unit to be located on the section of footpath at the above address. The installation of a Street Hub will support the telephony and wi-fi coverage of the area within a structure of high build quality commensurate with the general street scene context of the locale.

Additionally, the proposal would see the removal of an additional phone kiosk located within the Council area. This would help in achieving the advancement and decluttering of the council's streetscapes, in line with the UK Digital Strategy, the National Planning Policy Framework, and the relevant Development Plan for the area.

The associated advertisements would also be commensurate with the locale, whereby the nearby properties all have active and well illuminated shop fronts, with nearby premises to the south and west also having active shop fronts and whereby associated advertisements are prominent within the immediate street scene to which the proposal would be sited. The proposed unit, with its modern design and high build quality, will fit within the local character at this point, with the overall land use and commercial context. This kiosk being removed has in fact already been removed in anticipation of this proposal, due in part to its damage and location.

Proposed Kiosk Removal(s)	
Address	
Footpath at the corner of Hilton Street and	
	

The site is not located within any sensitive land designation, nor near to any heritage assets (either nationally or locally) including any Listed Buildings. The site location is shown on the image below, by way of a yellow star for context.



Aerial view of site

The below image, taken when surveying the site, shows the street view context and general location of the proposed Street Hub.



Street view of site

This application forms part of a strategic pack of applications to be submitted to Trafford Council, containing 9No. street Hub locations in total. It should also be noted that these proposals for the installation of a total of 9No. Street Hubs will see with it the removal of existing, outdated and worn-down BT payphones (where applicable), at no extra cost to the council. This would help in achieving the advancement and, where applicable decluttering, of the council's streetscapes, in line with the UK Digital Strategy, the National Planning Policy Framework, and the relevant Development Plan for the area.

2.2 Street Hub Design and Dimensions

Street Hubs are free-standing structures featuring a fully accessible tablet interface and digital HD display screens on two sides. Overall, Street Hub dimensions are 35cm deep and 123.6cm wide and a height of 298.6cm to maximize the Wi-Fi range without dominating the street. A narrow base limits the footprint while ensuring access to wheelchair users.

Street Hubs have been designed to be accessible to all users, regardless of their physical or technological capabilities. Street Hubs are free to use, fully accessible community assets connecting and improving local streets in urban areas. At no cost to taxpayers or end users, Street Hubs provide communities with an unprecedented suite of essential urban tools including:

- Ultrafast public and encrypted Wi-Fi
- Powered by 100% renewable carbon-free energy
- Inspected weekly and cleaned at least every two weeks, monitored 24/7
- Free phone calls
- Display community and emergency (i.e. police) awareness messaging
- Ability to house IoT sensors such as air quality, traffic etc.

The Street Hub unit will be funded through the display of advertising in conjunction with other council and community content, via sponsorship from companies who will utilize the digital HD display screens on both sides of the unit. The two screens automatically dim at night to 600cd/m², following daylight hours and in accordance with the levels set for this type and size of screen (those under 10m) by the Institute of Lighting Professionals, Professional Lighting Guide 05 2015: The Brightness of Illuminated Advertisements - minimizing disturbances to residents in the evening.

The screens will display content at 10-second intervals, in the form of both the commercial content that funds the service, as well as a wide range of local community and council content. As such, the proposed Street Hub will provide 876 hours of free council advertising per year with the opportunity for discounted advertising for local business groups (such as BIDs and Chambers of Commerce) and their members through BT's Street Hub Partners Program.

This sponsorship will also cover the maintenance and servicing costs of the Street Hub. This is necessary to ensure the program remains financially sustainable. Displayed advertisements will comply with all advertising regulations and guidelines. Further detail is provided in the attached Street Hub Product Statement and associated documents.

Moreover, all Street Hubs are powered by 100% renewable carbon-free energy, with energy efficiency prioritized throughout the design process. This is most evident in the following features:

- A state-of-the-art LED-backlit LCD screen that consumes approximately 60% less power than Cold Cathode Fluorescent Tubes

- Screen filters reflect light reducing the need for high power, noisy cooling systems typically seen in competing solutions
- Industrial-grade components designed to function at high temperatures lower the need for cooling without compromising performance
- Passive design for cooling, i.e. aluminium casing for better thermal dissipation
- High-efficiency power supplies providing 80% or better efficiency, compared to 65-70% of typical components.
- Noise from cabinet and equipment should not exceed: 41dB at a distance of 3 metres during day, 35 dB at a distance of 3 metres during night, Operational volume should not exceed 60dB at a distance of 1 metre.

2.3 Application History

Having checked the Councils online planning search, there are no planning application relevant to the application site.

2.4 The Bury Council Rollout and Pre-application

This application is part of a wider scheme of Street Hub deployment across the Council area. As stated previously, a total of 9No. locations have been identified for the installation of a Street Hub in the Council area.

In terms of roll-out, where possible and practicable, it is proposed to install Street Hubs either as a direct replacement for existing BT payphones, or in very close proximity to such payphones. As these existing payphones will be removed it should minimise impact on existing streetscenes by reducing street clutter, or at least not adding to it at particular locations. Whereby a new Street Hub is proposed, BT payphones will be removed, again where possible and practicable from the same streetscape, same visual envelope or nearby streets, again to try to minimise impact on visual clutter. All of the proposed Street Hubs either directly replace, or are close to existing payphones for removal, but in some instances a new site is required and subsequent sacrificial kiosks offered for removal (if applicable), although in some instances the proposal will be for a new installation with no nearby existing kiosks available for removal. The proposed Street Hub's will help to deliver a comprehensive network of connectivity within the borough whilst decluttering, where applicable, existing streetscenes.

Given that applications for the same proposal (in terms of Street Hubs) were previously submitted in the Council Area and largely supported, it was not considered necessary to undertake any further pre-application consultation in this instance. The same principles for site selection, rationale and highways safety have been considered for this further planned rollout of sites.

3.0 Planning Policy

This section sets out the most relevant national and local planning policy concerning the proposed development.

3.1 National Planning Policy and Guidance

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

The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (as amended) set out the Government's advertisement control planning policies for England and how these are expected to be applied and is considered to be a material consideration for the Express Advertisement Consent application. The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (as amended) state the following specifically in relation to advertisement control:

PART I – Section 3

Powers to be exercised in the interests of amenity and public safety

3.—(1) A local planning authority shall exercise its powers under these Regulations in the interests of amenity and public safety, taking into account—

- (a) the provisions of the development plan, so far as they are material; and
- (b) any other relevant factors.

(2) Without prejudice to the generality of paragraph (1)(b)—

- (a) factors relevant to amenity include the general characteristics of the locality, including the presence of any feature of historic, architectural, cultural or similar interest;

(b) factors relevant to public safety include—

- (i) the safety of persons using any highway, railway, waterway, dock, harbour or aerodrome (civil or military);
- (ii) whether the display of the advertisement in question is likely to obscure, or hinder the ready interpretation of, any traffic sign, railway signal or aid to navigation by water or air;
- (iii) whether the display of the advertisement in question is likely to hinder the operation of any device used for the purpose of security or surveillance or for measuring the speed of any vehicle.

(3) In taking account of factors relevant to amenity, the local planning authority may, if it thinks fit, disregard any advertisement that is being displayed.

- (4) Unless it appears to the local planning authority to be required in the interests of amenity or public safety, an express consent for the display of advertisements shall not contain any limitation or restriction relating to the subject matter, content or design of what is to be displayed.

National Planning Policy Framework (December 2023)

Planning policy is provided at the national level by the National Planning Policy Framework (NPPF). It is a material consideration in planning decisions. The NPPF is pro – development with a ‘presumption in favour of sustainable development’ seen as a golden thread, running through both plan making and decision taking’. The thrust of this guidance is positive and a reminder to LPAs that we need to build the requisite infrastructure to enable economic growth.

In this regard the Framework can be summarised as follows:

- Government policy is to support high quality communications infrastructure and systems as essential for sustainable economic growth;
- Government policy is to keep the inevitable environmental impact associated with electronic communications development to a minimum;
- The best way to minimise environmental impact is to avoid the unnecessary proliferation of new radio masts and sites;
- The starting point for planning new networks or the expansion of existing networks is therefore to use existing electronic communications sites as and when applicable;
- The emphasis on minimising environmental impact is greater per the sensitivity of the site. The emphasis on exploring and utilising site sharing opportunities is consequently higher in these circumstances;
- Best practice encourages a consultative approach and one that seeks to minimise potential visual impact and
- Great weight should be given to conserving landscape and scenic beauty in certain specified designated landscapes, e.g. National Parks, Areas of Outstanding Natural Beauty, Conservation Areas, etc.;

The NPPF as a whole is aimed at encouraging a more positive approach to town planning. While the NPPF builds environmental protection into the definition of sustainable development, there is also a very clear emphasis that local planning authorities should be looking for ways to help development come forward and not reject applications simply on environmental grounds. This is emphasised in paragraph 10 of the NPPF, which states that in order that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development. The NPPF recognises that this is especially relevant where a

development might have other significantly important benefits such as being essential to meet, for example, enhancement and improvement to existing communications infrastructure.

Paragraph 11 of the NPPF state that for ‘decision-making’, the presumption in favour of sustainable development means approving development proposals that accord with an up-to-date development plan without delay; or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- i. *the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

As such, development proposals that accord with the provisions of the Development Plan should be approved without delay. In respect of this guidance, the following sections of this statement demonstrate that the proposed development accords fully with all relevant Development Plan and NPPF policies and, therefore, permission should be granted for the development.

The importance of the proposed development in providing the upgrading and enhancement of the existing public phone kiosk network is clearly an important material planning consideration as it directly supports sustainability and is also precisely the type of new digital infrastructure that the NPPF is seeking to support. The development proposed is comparatively small scale, sited where the principle of telecommunications development has been long established and therefore accepted, designed in a way that is predominately consistent with the existing infrastructure setup and so should be acceptable in every respect.

However, for completeness we still highlight some of the key points within the NPPF as they help demonstrate why the application should be permitted:

Paragraph 7 advises that the purpose of the planning system is to contribute to the achievement of sustainable development. It then states that: “*At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.*” [our emphasis];

Paragraph 20 advises that strategic policies should “*make sufficient provision for.....telecommunications*” and that it should “*be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances*”

Paragraph 38, on “decision-making” states that authorities should “*work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible*”.

The NPPF builds on the aspiration to build a strong, competitive economy. Paragraph 85 states: ‘*Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking in to account both local business needs and wider opportunities for development. The approach taken, should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation⁴⁴...*

Footnote 44 of the NPPF states: ‘*The Government’s Industrial Strategy sets out a vision to drive productivity improvements across the UK, identifies a number of Grand Challenges facing all nations, and sets out a delivery programme to make the UK a leader in four of these: artificial intelligence and big data; clean growth; future mobility and catering for an ageing society. HM Government (2017) Industrial Strategy: Building a Britain fit for the future*’.

As highlighted previously, the NPPF directly addresses the need for enhanced wireless communication services, first mentioned in paragraph 20, which states that an LPA’s strategic policies must make sufficient provision for:

“b) *infrastructure for transport, telecommunications (our emphasis), security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)*”

Leading on from this, paragraph 118 states that “*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.....*”. This wording echoes guidance set out in paragraph 42 of the 2012 version of NPPF. However, unlike the previous version it also includes the importance of reliable communications infrastructure for both economic growth and social well-being.

While supported, paragraph 119 of the NPPF retains the requirement to minimise the number of installations consistent with the efficient operation of the network but also includes being consistent with the needs of consumers and providing reasonable capacity for future expansion.

Paragraph 122 retains the guidance set out in previous versions of the NPPF version and states that “*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, or set health safeguards different from the International Commission guidelines for public exposure”.

As can be seen from the above, the NPPF clearly acknowledges the benefits of modern electronic communications and seeks to encourage such development as being essential due to their role in supporting a modern economy, contributing to sustainable objectives, and enhancing local community access to a range of goods and services. Local planning authorities are advised to respond positively to proposals for electronic communications development and this must include an understanding of the associated special problems and technical needs of developing and upgrading communications networks.

Public benefits are defined within the NPPF and could be anything that delivers economic, social or environmental progress. Benefits do not always have to be visible or accessible to the public in order to be genuine public benefits.

In addition to the above, paragraph 141 highlights 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”.

In the case of this proposal site, the installation of the Street Hub unit would provide a modern, multifunctional alternative to the traditional ‘mast’ that would act as a communication hub within a dense urban area, while ensuring that the character of the area is not significantly adversely impacted upon in respect of matters relating to amenity and public safety.

Specific guidance relating to advertising developments and on the interpretation of the Regulations is contained within the **Communities and Local Government Planning Practice Guidance** (“PPG”), which contains the current guidance on this subject. Section 8 of the PPG 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.”

3.2 Development Plan Policies

Section 70 of the Town and Country Planning Act 1990, as amended, requires planning applications and appeals to be determined having regard to the provisions of the Development Plan and other material considerations, and section 38 of the Planning and Compulsory Purchase Act 2004 requires applications and appeals to be determined in accordance with the Development Plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy framework (NPPF) - among them the 'presumption in favour of sustainable development'.

For the purposes of Section 70, the current adopted Development for Trafford Council comprises the following;

- The Places for Everyone Plan (PfE), adopted 21st March 2024.
This is a Joint Development Plan of nine Greater Manchester authorities: Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan. PfE partially replaces policies within the Trafford Core Strategy (and therefore the Revised Trafford Unitary Development Plan), and Appendix A of the Places for Everyone Plan for details on which policies have been replaced.
- The Bury Unitary Development Plan 1997
The current Bury UDP was adopted by the Council on 29th August 1997 and acts as a guide for the future development or protection of land in the Borough and together with other adopted Development Plan Documents its policies and proposals form the basis for the Council's decisions on planning applications

Local Plan Policies

Relevant Places for Everyone Plan (PfE) Policies

JP-P1 - Sustainable Places

This policy seeks to support the aim to become one of the most liveable city regions in the world, consisting of a series of beautiful, healthy and varied places, and where appropriate consistent with the following;

1. Distinctive, with a clear identity that:
 - A. Conserves and enhances the natural environment, landscape features, historic environment and local history and culture;
 - B. Enables a clear understanding of how the place has developed; and
 - C. Respects and acknowledges the character and identity of the locality in terms of design, siting, size, scale and materials used
2. Visually stimulating, creating interesting and imaginative environments which raise the human spirit through the use of green space, public art and quality design
3. Socially inclusive:
 - A. Responding to the needs of all parts of society;
 - B. Enabling everyone to participate equally and independently;
 - C. Providing opportunities for social contact and support; and
 - D. Promoting a sense of community
5. Adaptable, able to respond easily to varied and changing needs and technologies
8. Safe, including by designing out crime and terrorism, reducing opportunities for anti-social behaviour and by ensuring that developments make appropriate provision for response and evacuation in the case of an emergency or disaster
11. Incorporating inclusive design within all spaces with support for tackling inequality and poverty to form part of creating sustainable places
14. Well-connected to other places, particularly by public transport and digital infrastructure enabling everyone to take advantage of the employment, cultural and leisure opportunities across Greater Manchester and beyond

JP-P6 – Health

To help tackle health inequality new development will be required, as far as practicable, to:

- A. Maximise its positive contribution to health and wellbeing, whilst avoiding any potential negative impacts of new development;
- B. Support healthy lifestyles, including through the use of active design principles making physical activity an easy, practical and attractive choice;

JP-C2 – Digital Connectivity

We support the provision of affordable, high quality, digital infrastructure. In making decisions we will support a range of measures, including:

1. Enabling the roll-out of latest generation mobile technology and full fibre to the premises connectivity, in a way that maximises coverage whilst protecting

- townscape quality and ensuring an ability to respond to updated/changing technology;
2. Requiring all new development to have full fibre to premises connections, unless technically infeasible and/or unviable, and to incorporate multiplexing compliant with telecoms standards, to facilitate future-proof gigabitcapable network connections. It is expected that internet connections will be operational and immediately accessible to network providers when occupiers move into new properties and
 3. Facilitating the provision of free, secure, high speed public wi-fi connections, particularly in the most frequented areas.

JP-C5 – Streets for All

Streets will be designed and managed to make a significant positive contribution to the quality of place and support high levels of walking, cycling and public transport. Targeted improvements to the highway network will be supported through studies and scheme development, where they complement the aim of securing a significant increase in the proportion of trips made by walking, cycling and public transport (as set out in Policy JP-C6 'Walking and Cycling' and Policy JP-C3 'Public Transport'). We will seek to ensure:

1. The design and management of streets will follow a Streets for All approach, including by:
 - a. Understanding the 'movement and place function' of streets as the starting point for improvement;
 - b. Ensuring that streets are welcoming for all, and respond to the needs of those with reduced mobility;
 - c. Delivering new and improved walking and cycling routes and facilities as part of the delivery of an integrated sustainable transport network;
 - d. Maximising the ability of pedestrians and cyclists to navigate easily, safely and without delay, and minimising barriers and obstacles to their movement;
 - e. Ensuring the efficient movement of people and goods on streets with a high 'movement function'.
3. Any new infrastructure minimises the negative effects of vehicle traffic; and
4. New infrastructure includes provision for utilities and digital infrastructure where required.

The Bury Unitary Development Plan 1997

EN1/9 - Advertisements

The Council will seek to control advertisements in the interests of amenity and public safety in order to enhance the quality of the Borough's environment. In doing so the Council will have particular regard to the following considerations:

- the characteristics of the local neighbourhood, including scenic, historic, architectural and cultural features;
- the scale and massing of existing buildings and structures;
- the nature of the predominant land use in the locality;
- the presence of Listed Buildings or Conservation Areas;
- any proposals for land use change in the area;
- with reference to the countryside, land-form, the quality of immediate surroundings, landscape character and background features;
- the effect on the safe use of any form of transport, including the safety of pedestrians.

While the above policy and plan are of an age whereby they could be considered as being 'silent' in the decision making process, the wording of the policy is not consistent with that of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (the Regulations) and the National Planning Policy Framework (the Framework) makes it clear that control of advertisements may only be exercised in the interest of amenity and public safety. As such, it is not considered that this policy would itself be afforded any significant weight in the decision making process.

EN1/10 - Telecommunications

The Council will give favourable consideration to proposals for new telecommunications developments. In assessing such proposals the Council will have regard to the following:

- the operating requirements of available and new telecommunications technology, and the national telecommunications network;
- the legal requirements of telecommunications code system operators;
- siting and design - including the opportunity for sharing masts or siting on existing buildings, height, ancillary development, landscaping, screening and the type and colour of materials used;
- the visual and physical impact, especially on the Green Belt, river valleys, Special Landscape Areas, Listed Buildings, Conservation Areas, ancient monuments and archaeological remains.

While the above policy would be of relevance given the telecommunications element of the proposal and Street Hub, it is not considered that the wording of the policy and therefore policy in general, would be of any consideration in this instance other than reference to height, type and colour of materials.

In addition to the above policies, PG19 'Advertisement' provides further guidance for consideration in respect of advertisement proposals. Section 9 of this guidance states that signage can appear obtrusive or visually intrusive due to being too large, sited too prominently, sited where they remain visible over a long range and out of keeping or unrelated to any nearby buildings or the area as a whole. It further states that too many signs on premises, particularly when they are of different shapes or design and in close proximity, will look unduly cluttered.

3.3 Planning Assessment

Modern cities require to provide both residents and visitors with digital connectivity to enable their day to day living and enjoy recreational activities, all of which contributes to the vitality of the city and its economic and social sustainability.

The aim to replace existing BT payphones with the improved Street Hub units will generally enhance the public realm and many streetscapes, whilst providing free digital connectivity and other services at no cost to the Council, to enrich the users experience of moving through this public realm. The advantage in terms of advertisement will remove the display of many adverts with deemed consent on existing phone boxes, replacing them with modern LED digital displays to which the Council will benefit from 5% free screen time (circa 438 hours a year per display or 876 hours per unit), all of which will be properly maintained and can be controlled through the requirement for express consent. The adverts will help support this function and as such are in intrinsic part of the development, which given the retail/commercial context of the locale would not be considered as being overly visually incongruous and are such pieces of equipment that are now more commonplace within streetscenes throughout the country.

Siting

The locations of the Street Hubs have been primarily identified to replace existing BT payphones, where possible and practicable, although it may see a relocation from the existing payphone site or a new site (with existing kiosks nearby removed when possible but not always), but also to provide seamless fast, free Wi-Fi service throughout the key commercial, retail, and pedestrian areas within the council, whereby residents, visitors and businesses can all use this service, together with the additional benefits of the Street Hub. In addition, Street Hubs are proposed in areas whereby tourists enjoy recreational facilities, and as such services will enhance the overall tourist/resident experience of the city.

At the conception stage, we have tried to focus on pursuing direct conversions of existing kiosks wherever practicable. Also, we have looked for locations with wide pavements, and where a sites relationship with existing street furniture avoids undue proliferation of clutter, along with further consideration in respect of siting. It should be recognised that BT's legacy estate of payphones has grown up organically over the years, in which the whereabouts of BT kiosks can sometimes sit in environments that have changed dramatically around them. In some instances, the BT Street Hub project has been seen as an opportunity to improve the pedestrian environments by removing awkward BT kiosks (where possible or practicable) and repositioning the new unit to a more in keeping spot in the street scene.

It is appreciated that streets are ever-evolving environments, amidst society's changing connectivity demands. BT has a universal service obligation with Ofcom to provide a street level phone service, so the selection process of kiosks to be removed had to cater for this, however there is a recognition that the use of phone boxes has dramatically changed since kiosks were first conceived, whilst now the need for Wi-Fi

and mobile coverage has increased massively. In this respect we have tried to build a sequence of Street Hub sites wherever possible, so that this can improve the user connectivity experience as they travel through an area.

Likewise, as Street Hubs can provide the Council with valuable data as each unit has environmental sensors that can monitor air, sound and light, in most instances it is beneficial to plan a sequence of Street Hub sites along key routes, so that the information gathered can be better analysed. This free environmental data has its own dashboard and can assist the planning system actively manage patterns of growth in support of national air quality objectives and will be a useful source of real-time data in the delivery of the Council's own green agenda. In a similar vein, Street Hubs have the capability to monitor pedestrian, cyclist, and vehicle movements and so can help the Council to monitor and, where practicable, develop travel plans for the area.

Like all development, the introduction of anything new within a particular environment will always be, to some degree, a noticeable addition or change to those residents, businesses and regular passers-by found closest. However, it should be appreciated that the visibility of something that is new or the change in form of something that has an established presence on-site, like the removal of an existing or nearby a telephone kiosk and installation of a new Street Hub unit, does not automatically result in an overwhelming adverse harm occurring, irrespective of any potential land designations. The starting point and fundamental principle applied by the applicant is always to replace existing BT call boxes with Street Hub units where they will be in-keeping with their existing surroundings. In this regard it is seen as an opportunity to help future proof the high street making them smarter, safer, and more sustainable.

In progressing new Street Hub sites, so far as practicable we have sought to minimise the contrast between the development itself and its immediate environment through appropriate siting and design. The siting of each Street Hub has been considered having regard to the available footpath widths, the whereabouts of the existing payphones to be removed and the visual character of that particular street scene where the new Street Hub is proposed. With regards to its associated advertisement screens, thought has been given to its immediate context and public safety in terms of pedestrian and vehicular movements. These criteria have been adjusted where necessary on a site-by-site basis to account for local context and policy requirements when reassessing the site's suitability to accommodate a new Street Hub unit.

Justification for the siting and appearance of the proposed Street Hub has been assessed against up to date national and local planning policies and any other material considerations. As a result, assessment would focus on whether the removal of the existing BT call boxes, when balanced against the replacement of new Street Hub at the application site or in close proximity to the site, or indeed the installation at a new location, creates a significant visual harm that would outweigh the public benefits in this instance.

Proposed Location

In this instance, the proposals would see the installation of a new Street Hub on the proposed application site as highlighted above. As stated previously, an existing kiosk has been removed a short distance to the south of the site in advance of this application being submitted.

When considering the above siting criteria, the site location in this instance has been selected due to the strong commercial context at this point as well as there being strong advertisement context whereby such a proposal would not be seen as being overly visually incongruous at this point particularly when considering this context and development, this as well as the application site having a wide section of footpath meaning that matters relating to free flow of pedestrians or potential desire line, as well as general highways safety at this locale, would not be impacted upon. Additionally, there has until recently been a free standing advertisement to the north of the site which has recently been removed due to the overgrown hedge, and as such the principle of such units has been a longstanding part of the overall streetscene at this point. The nearby advertisement and free standing units are shown in the images below.



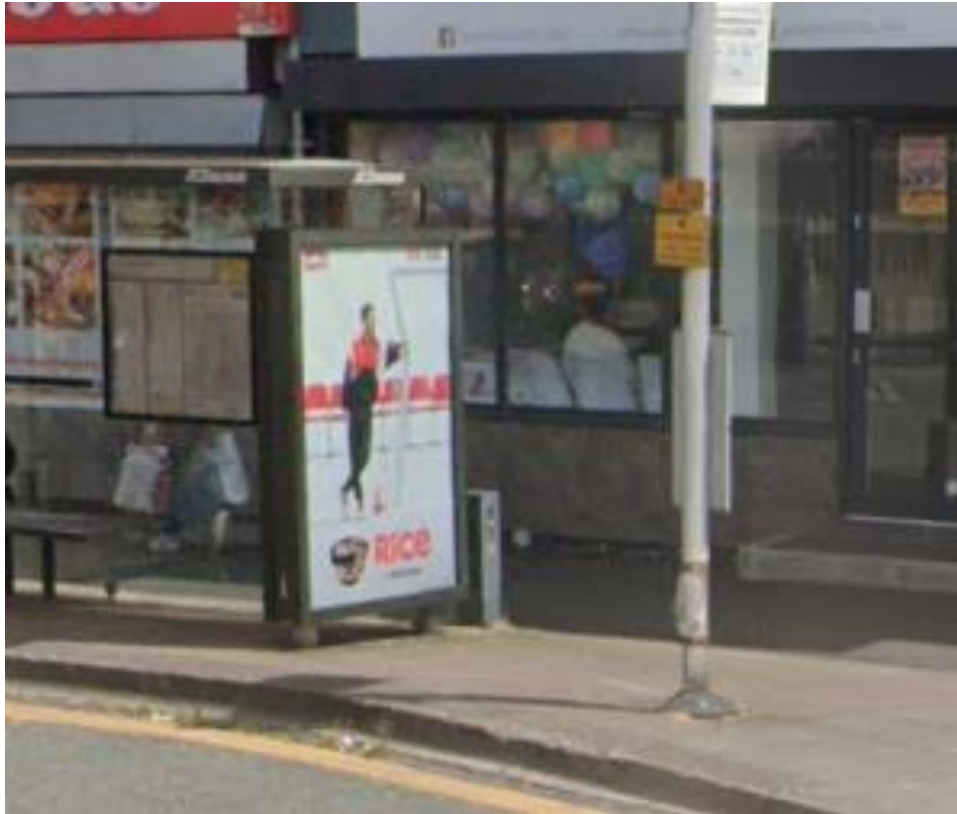
Existing freestanding advertisement at bus stop on opposite side of the road



Historic freestanding unit to the north on the same footpath



Freestanding advertisement to the north on opposite side of the road



Existing freestanding advertisement at bus stop to the north on same side of road



Free standing advert as the corner of Bury New Road/Richmond Avenue



Existing freestanding advertisement to the south

When considering the above siting criteria, it is considered that with the proposed site, given the surrounding street scene and context within the immediate vicinity, the proposal would therefore not have any significant impact in terms of the existing public realm or street scene setting, and should not be viewed as being visually incongruous at this location. The fact that there are no other nearby existing advertisement of this scale on the existing pavement does not mean that it would be seen as being out of keeping with the general locale, or considered as proliferation at this point, to such a degree that would merit refusal. This is a position the planning authority has clearly taken in approving very similar proposals within the Council area, whereby there was no existing freestanding advertisement on the footpath and still considered acceptable given the street scene context.

As such, it is clear that the proposal would NOT by virtue of their size, design and illumination be incongruous, unsympathetic and visually intrusive within the street scene, or be harmful to general amenity of the locale.

Furthermore, the proposal has a very sleek style and vertical emphasis that reiterates its modern design and appearance and has a floor area of circa 0.43 square meters when compared to old phone kiosks which are 0.8 square meters. There is also a difference in the overall density of the Street Hubs compared to these old kiosks, whereby the Street Hub is circa 1.3 cubic meters, and the older kiosks are circa 1.75 cubic meters. As such, it is considered that siting in this instance would represent a suitable location, while introducing an acceptable standard and form of development to the locale and street scene.

In addition to the above, as stated previously the additional sacrificial kiosk has already been removed in advance of this application being submitted.

Appearance

The proposed BT Street Hub unit is an advanced, modern development which has been designed following significant improvements in technology and digital content over recent years. It can promote the image of the authority as a vibrant place, and we believe it will improve the quality of the immediate streetscape for residents, businesses and visitors.

The proposed design is slimmer and takes a more compact profile than the existing BT payphone boxes that it would replace (or introduce a new structure) in terms of infrastructure. The user interface is located at a low level and is a similar height to an existing BT payphone unit to ensure that it is accessible to all users.

The appearance of the BT Street Hub unit has a vertical emphasis and by reason of its reduced footprint would give a slender more elegant form of development when compared to an existing payphone kiosk. The appearance of the structure is not considered to be harmful to the wider street scene at this locale, especially when taking into account the nature of the existing phone kiosks and the consideration above. We believe the appearance of the area and street scene will not be compromised by the proposed new BT Street Hub.

The new structure will be set within a commercial setting at this point, in an area well used by pedestrians accessing the nearby shops and facilities as well as that of the adjacent bus stop and as such the area is well-lit throughout the day as well as at night. While it is accepted that the BT Street Hub advertisements will be more visible during the hours of darkness or in dull conditions, its appearance would not be out of keeping with the general locale which is well lit by streetlights and other light emission as stated. In this context, the BT Street Hub design would not appear detrimental to the visual amenity of Bury New Road at this point or that of the surrounding street scene.

It is concluded that the design of the proposed Street Hub is justified, and its appearance commensurate with the nearby uses and general street scene context at this point. Therefore, it is considered that the appearance of the proposed Street Hub is acceptable and is in accordance with national and local planning policies, particularly as it would enhance and promote sustainable streets and places, while facilitating the

provision of free, secure, high speed public wi-fi connections in areas that see heavy footfall.

Advertisements

Amenity impact concerns an assessment of the character of the local area, which includes the nature and type of surrounding land uses and the existing built form within the locality where the proposed advertisement is to be displayed. It is the impact upon local character and any feature of interest in the local environment that the proposed advertisement is assessed. In respect of public safety, the primary consideration is the likely effect an advertisement display would have on drivers and pedestrians and whether the display of an advertising in the position and manner is likely to prejudice public safety.

It is recognised that the purpose of advertising is to be seen but this does not mean advertisements are likely to present a distraction. Advertising is characteristically part of the fabric of commercial centres and are often located alongside main transport routes where drivers and pedestrians are highly likely to see a range of commercial images.

When seen in the overarching context of the street scene, it is considered that the location, size and height of the digital advertisement panels would, on balance, be acceptable in what is a commercial context which has historically seen similar development within the general locale, including similar scale and size of units hosting advertisements. As previously discussed, it is believed that the siting and appearance of the BT Street Hub would not create significant harm to the amenity of the area that would outweigh the public benefits and other material factors of consideration.

In terms of public safety, the site of the BT Street Hub and the display of digital advertisements on its sides will allow for the continued safe movements of pedestrians as highlighted. In this regard, as previously concluded its presence within the street scene would not endanger public safety of those people who are taking reasonable care for their own and others' safety.

It is recognised that all advertisements are intended to attract people's attention, however in this case their siting and size would not create an untoward feature within the existing commercial street scene and general locale. The position where the BT Street Hub is to be located in relation to the road would not cause any interference with nearby road signs and or navigational lights. Viewed within the street scene setting, the digital advertisements would be partially seen by passing motorists but would not create confusion nor influence the behavior of drivers to such a degree that they would cause a hazard by reason of their presence. Furthermore, given its location it would not give rise to any potential impact on visibility splays or sightlines. When viewed within the street scene context of the wider environment, it is not considered that the Street Hub would appear as an untoward feature to passing motorists.

Regarding pedestrian safety, the proposed street hub would (when in-situ) retain a footpath width of circa 7.4m to the adjacent building, and which would be more than

adequate to allow the free flow of pedestrian at this point. Given this remaining footpath width, it not considered that the proposal would have any detrimental impact on the free flow of pedestrians at this point, nor impact of desire lines given the remaining footpath width and location of the unit kerb side.

In determining the above, consideration has also been given to the fact that the Department for Transport Manual for Streets (2007) confirms that there is no minimum width for footways. It suggests that in lightly used streets, the minimum unobstructed width for pedestrians should generally be 2000mm, and that in areas of higher pedestrian flow the quality of the walking experience can deteriorate unless sufficient width is provided. Inclusive Mobility (2002) advises that ideally the width of the footway should be 2000mm to facilitate two people in wheelchairs to pass each other comfortably. Where this width is not possible, a clear width of 1500mm should be provided, with an absolute clear minimum width of 1000mm in exceptional cases. The phrase 'clear' refers to the effective width taking into account permanent obstacles on the footway such as streetlamp standards, trees, telegraph poles, bus shelters for example. Furthermore, the Disability Discrimination Act (DDA) itself recommends a minimum footway width of 1200mm.

The area surrounding this specific site is visually busy, and the proposal would be an addition to the ground elevation in context with the general locale and land use.

The proposed usage for the screens has been set in accordance with Schedule 2 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007:

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.
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.
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.
4. Any structure or hoarding erected or used principally for the purpose of displaying advertisements shall be maintained in a condition that does not endanger the public.
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.

The Transport for London's (TfL) policy document 'Guidance for Digital Roadside Advertising and Proposed Best Practice – 2013' [the TfL Guidance] has also been a key document in the design and site selection process.

In addition to the above conditions, each Street Hub location has been assessed against and would comply with the following additional criteria from the TfL Guidance.

- There would be no conflict with any traffic signs, signals, crossing points, schools, hospitals or low bridges.
- No sightlines or clearances would be affected.
- The TfL guidance states that 'Static digital advertising is likely to be acceptable in locations where static advertising exists or would be accepted.' There is existing traditional advertisement on similar sections of the respective roads in many cases.
- The geometry of the roads is not complicated, and the driving conditions are not considered to be demanding or complicated.
- The advertisements would not be experienced by a driver in conjunction with any other similar digital advertisements.
- As per the TfL guidance, the advertisements would be located as close to the driver's natural eye line as possible and facing as head-on to the traffic as is practical. The lighting levels noted above are within the levels set for this type and size of screen (those under 10m²) as set by the Institute of Lighting Professionals, Professional Lighting Guide 05: The Brightness of Illuminated Advertisements (2015). A copy of this document is appended for clarity.

Noise Management

As one of many features, Street Hubs provide free phone calls via a speaker and microphone system. Information submitted in support of this application identifies the steps taken to ensure that these calls, like all the features of the Street Hub, help improve the amenity of a local area whilst also respecting the expectations of local community over time. It should be noted that the noise management plan refers specifically to the noise from the Street Hub. Noise from pedestrians, users of the Street Hub, or from other nearby sources are not included and would typically be considered matters for the Police and other authorities who have the appropriate and relevant powers to act on such issues if necessary.

The Street Hub has been designed so that they create a 'sound cloud' for the person making a call with noise levels sufficient to make calls with background noise for the surroundings. Whilst this generates a reasonable conversational volume in proximity to the Street Hub, it is intended to result in minimal to no noise being noticeable further away. The average volume settings are 65dB average at 3m distance from each Street Hub. Users may also choose to use headphones when making calls or using the tablet, which deactivates the speaker for the duration of their use.

It is worth noting that the Street Hub are situated on public streets, in the most part close to roads where high volumes of traffic will be seen, examples of background noise experienced on streets are details below:

Noise Level, dB	Example
60-70	Conversational Speech
70-80	Average traffic on Street Corner
80-90	Heavy lorries at 6m

Daytime (07:00 – 21:00)

Street Hub have controllable volume levels. This will default to 50% at the start of any user activity during the day and can be increased and decreased based on the preferences of the user.

Night Time (21:00 – 07:00) Between the hours of 21:00 to 07:00 all Street Hub will be governed so that the volume cannot be increased to greater than 60% of the maximum volume.

Exceptional Circumstances

Noise is managed by exception based on feedback from users and the local community. If feedback is received that the Street Hub may be causing detrimental environmental impact, the following actions are taken:

1. Understand the reason for the issue and any extenuating circumstances. At this point BT will separate out any Police or community safety matters and work directly with the relevant authorities and support the local residents in raising these issues through official channels where appropriate.
2. Verify the evidence provided against the Street Hub's call history and other operational data as required. This will allow an understanding of the the number, time, and frequency of outbound calls being made and better understand the severity of the reported situation.
3. Once the situation has been verified, BT will typically look to apply local bespoke volume governor controls appropriate to the situation. We have found that reducing the Street Hub 's maximum volume to 40% during relevant periods tends to resolve issues where they have been identified.

In addition to the above, BT will continue to monitor the situation and listen to ongoing feedback from the community as we do take matters seriously. BT continue to learn as part of their roll out as to how Street Hub are fitting into the community. To date, there has been no issues in respect of matters relating to potential noise nuisance.

4.0 Conclusion

BT Street Hubs have the potential to significantly enhance the provision of local community communications facilities and services. It is precisely the type of high-speed digital infrastructure that the government is seeking to support as part of the presumption in favour of sustainable development. It will deliver social, economic, and environmental benefits by providing a suite of essential urban tools/services, including free ultrafast Wi-Fi to residents, businesses and visitors in this area. Overall BT Street Hubs will help future proof the high street making them smarter, safer, and more sustainable through their adaptable design and function.

The proposed BT Street Hub structures are of a high quality, accessible design that would be a significant improvement when compared to the existing payphone kiosks. Modern signage which is interactive and multi-faceted in its use has become more acceptable on the street scape due to its functionality, clean and modern look. We consider the proposal in this case to be appropriately sited; to reduce street clutter, to improve available footway widths, not to negatively affect heritage assets nor adversely affect amenity or public safety.

We believe this statement has demonstrated that the BT Street Hub proposal is in accordance with national policy set out in the NPF4 and local development plan policies, in which we would hope that this application can be supported by your Council.

4.1 Proposed Schedule of Operating Conditions

To give assurance each Street Hub will operate as intended, we recommend the following conditions (or a version there of) as previously suggested, be included as part of any advertisement consent:

- a. *Within three (3) months of development commencing, the existing BT payphones indicated for removal, shall be removed in their entirety and the land made good to the same condition as the adjacent land.*
- b. *The intensity of the illumination of the two digital display screens shall not exceed 600 candelas per square metre (cd/m²) between dusk and dawn in line with the maximum permitted recommended luminance as set out by 'The Institute of Lighting Professional's 'Professional Lighting Guide 05: The Brightness of Illuminated Advertisements'.*
- c. *The digital display screens shall not display any moving, or apparently moving, images (including animation, flashing, scrolling three dimensional, intermittent or video elements).*
- d. *The minimum display time for each piece of content on the digital display screens shall be 10 seconds.*

- e. *The interval between each piece of content on the digital display screens shall take place over a period no greater than one second; the complete screen shall change with no visual effects (including swiping or other animated transition methods) between displays and the display will include a mechanism to freeze the image in the event of a malfunction.*
- f. *No content on the digital display screens shall resemble traffic signs, as defined in section 64 of the Road Traffic Regulation Act 1984.*