

26th March 2024

**Out of Home
Media**

Angola
Australia
Austria
Azerbaijan
Bahrain
Belgium
Botswana
Brazil
Bulgaria
Cameroon
Canada
Chile
China
Colombia
Costa Rica
Croatia
Czech Republic
Denmark
Ecuador
El Salvador
Estonia
Eswatini
Finland
France
Gabon
Germany
Guatemala
Hungary
Hungary
Honduras
India
Ireland
Israel
Italy
Ivory Coast
Japan
Kazakhstan
Korea
Latvia
Lesotho
Lithuania
Luxembourg
Madagascar
Malawi
Mauritius
Mexico
Mongolia
Mozambique
Myanmar
Namibia
New Zealand
Nicaragua
Nigeria
Norway
Oman
Panama
Peru
Poland
Portugal
Qatar
Russia
Saudi Arabia
Singapore
Slovakia
Slovenia
South Africa
Spain
Sweden
Switzerland
Tanzania
Thailand
The Dominican Republic
The Netherlands
Uganda
Ukraine
United Arab Emirates
United Kingdom
United States
Uruguay
Uzbekistan
Zambia
Zimbabwe

**Camden Council
Planning Development Control
Camden Council
Camden Town Hall
London WC1H 8ND**

Our Ref: A02496

F.A.O. Brendan Versluys

Dear Sir,

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

**Proposal: The Replacement and Upgrade of an Advertised Call Box
Site: Pavement o/s 221 Camden High Street NW1 7HG**

I enclose applications relating to the existing call box at the above location, which seek Planning Permission (**PP**) and Advertising Consent (**AC**) for its replacement with a modern Communication Hub Unit¹.

Site History

The applications are resubmissions following the refusal of a recent scheme to retain the three-sided call box and update the advertisement display, which were decided under LPA references 2023/4643/A and 2023/2990/P. As you will also recall, PP and AC were granted in November 2022 for a similar scheme to replace the existing call box with a modern Hub unit, which was marginally smaller than the version now being applied for. A copy of the PP and AC is included as **Appendix C**.

In the decision for this site the Inspector made the following observations on the safety aspect of the replacement of the call box with the modern Hub unit;

JCDecaux UK Limited

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- “ 26. The proposed unit would be installed in place of the existing kiosk. It would be narrower than the kiosk and would occupy a much more modest footprint. It would stand in an existing area of street furniture with a small street tree and bins to the south and a modest bench structure on the north side. The Council suggests that it would be within a pedestrian desire line, however at my visit to the site I could see that those walking along the pavement pass beside the existing kiosk in the clear area of pavement between it and the adjacent shopfronts.
27. I accept that the unit would be erected in a very busy pedestrian area. However, even if I consider the potential additional foot fall that might result from the significant planned development referred to by the Council, the proposal would not obstruct an area of pavement that is currently unobstructed, and would be more modestly sized than the existing kiosk that it would replace. It would present less of an obstruction to those with a visual impairment as a result of its narrower width, and in any case would stand in a zone with other street furniture towards the outer edge of the pavement, away from the main clear part of the footway.
28. The site is close to an existing access. However, in the context of the level of activity in the area, the addition of the digital advertisement screen would not be a significant distraction to those using this junction. Furthermore, its impact would be modestly lessened by the presence of the existing young tree that stands close to the site to the south.
29. In summary, the proposal would not harm the safe and efficient operation of the highway network or public safety. It would accord with Policies G1, A1, C6 and T1 of the LP, which together seek to ensure that development proposals are of a high quality, adequately address transport impacts, and are accessible”

And as to character and amenity impact;

- “ 30. This site is located in a vibrant and busy shopping area, alongside a row of shops with awnings and merchandise that was spread out onto the pavement at the time of my visit. The unit would be more modest than the kiosk that it would replace, and it would be of a greatly simplified design with crisp and neat detailing. In terms of its overall form the proposed unit would look better than the existing kiosk.
31. The proposal would introduce an illuminated digital advertising panel that would occupy most of one side. The unit would roughly align with a digital advert screen of a different design on the other side of the road. The visual impact of the proposed unit would however be modestly mitigated by the presence of the tree to the south. The unit would not appear isolated as it

¹ Appendix A and B

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would stand close to other street furniture and street trees. On this basis, and in the context of the vibrant and visually noisy character of the area during the day, I am satisfied that the proposal would not be harmful. During the main part of the night when the streets are quieter and the shops are not trading a condition could be imposed to turn the advert off, which would ensure that the darker appearance of the street at night is not harmed.

32. The Council suggests that the proposal would harm the setting of the adjacent Camden Town Conservation Area (the CTCA). The closest part of the CTCA is characterised by its busy and dynamic commercial frontages. The unit would stand close to the boundary of the CTCA. However, given the intervening items of street furniture and the otherwise busy character of the designated area, I am satisfied that it would not cause harm to its setting.
33. Although not mentioned in its decision, the Council has included details of nearby listed buildings in its appeal submission. I considered the setting of these when I visited the area. All are remote from the site and are separated by various buildings and structures, as is typical of a densely developed urban setting. I am satisfied that the proposal would not harm the setting of any of the listed buildings referred to by the Council.
34. In summary, the proposal would not harm the character and appearance of the area, the setting of any listed building or the adjacent CTCA, or matters of visual amenity. It would thus accord with the requirements of the LBCA and paragraph 199 of the Framework, which establishes that great weight should be given to the conservation of heritage assets. It would also accord with Policies D1, D2 and D4 of the LP, which together seek to ensure that development proposals are of a high quality of design and preserve the character and amenity of an area including designated heritage assets.”

The revised proposal is for the same design of unit and position on the footprint of the existing call box.

Application Detail

The existing call box at the application site is located on the south west side of Camden High Street and has been a feature of the street for many years. Furthermore, as mentioned in the most recent applications, the existing call box structure is over ten years old and has come to the end of its effective life. The replacement Hub unit is marginally wider and taller than the structure approved in 2022, but essentially the same dimensions as the

existing call box². The area of advertisement display affixed to the apparatus will remain the same extent as the current display, which has been continually used for that purpose since first installation. The change from a printed image to an LCD screen is consistent with other roadside displays found across the Borough and Greater London. The change is seen as a natural evolution of this form of medium and represents a more sustainable form of roadside advertising. The updating of the structure will make no appreciable change to the amenity or appearance of the street.



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

² Appendix D

Primarily these proposals, which are submitted on behalf of In Focus Networks Ltd, are communication apparatus that use the latest form of digital technology. Support for the development of digital infrastructure is found under Chapter 10 of the National Planning Policy Framework (NPPF). The proposal in these applications is one step towards realizing the ambition of expanding the electronic communications networks in the UK, including next generation mobile technology and full fibre broadband connections available to all. The traditional role of the telephone call box seems ill equipped to keep pace with the modern digital environment. The proposed Hub will act as portal to enable people to access digital networks and to complement any existing free Wi-Fi 4G/5G provision.

Good design is recognised as an important component in creating a sense of place and inspiring cityscapes that can brighten and enrich people's lives. The communication Hub is a new product and one that embodies the principles of good design and innovation. These attributes are the main features of this furniture, qualities that distinguished the Hub Unit in the IEMA 2020 Awards shortlist. The IEMA Awards recognises Companies, teams and organizations that have developed innovative solutions to deal with urban challenges. The Hub Unit was shortlisted in two important categories; on the integration of sustainability principles in the design; and use of the platform for social and community engagement and inclusion.

Development Detail

The specification of the Hub Unit is included with the application documents as **Appendix E**, which provide an illustration of the overall dimensions and the range of potential functions. The Hub Unit is based on our "Forum" unit, which was designed by Fosters and Partners. The unit stands at a height of approximately 2.63 meters, has a slender side profile measuring 0.3 metres and occupies an area of around 0.4m² metres. The screen is elevated by 530mm above the pavement and intended for a pedestrian audience. The communication side of the unit includes a projecting canopy comprising solar panels that are used to light the unit. The communication side of the Hub is activated via a 32" touchscreen above a defibrillator cabinet, which is a standard feature on all units. This side of the Hub also includes the charging point, direct emergency service line and local news channels.

When not in use the 32” screen can be programmed to default to a map of the Borough.

A touchpad is positioned at 1m from the ground to provide easy access for wheelchair users and the screen is designed with high contrast colours to assist the partially sighted. The Unit brings the In Focus public phone service up to date to include the next generation of communication provision which is free to the public. This type of development is supported by the Governments Statement of Strategic Priorities³, which expresses the aim of creating a reliable and accessible World class digital infrastructure in the UK.



GM Police Crime Awareness Campaign in Manchester City Centre

The free to use network is funded by the revenue from the advertisement on the rear of the unit. The advertising face is equivalent to the size of display found on bus shelters and other street furniture within urban areas. The advertised façade comprises an ultra-HD LCD screen for outdoor use,

³ Statement of Strategic Priorities for telecommunications, the management of radio spectrum, and postal services July 2019 Department of Digital, Culture, Media and Sport.

making it visible in direct sunlight and able to automatically adjust to ambient changes by means of an inbuilt light sensor, and limited to a maximum 300Cdm² at night-time⁴. The screen can show both static and dynamic content which is changed remotely via a secure direct ISDN feed every 8-10 seconds. The screen is principally used to display commercial messages but includes a dedicated share of time for community messaging via the Council's community channel or used as a platform to promote local safety campaigns. In the event of a malfunction the screen will switch off and automatically alert JCDecaux's dedicated digital team of the fault and schedule a repair. The display screen will switch off between the hours of 11:59 p.m. and 6:00 a.m.

The Hub specification covers some of the potential functions that can be provided by the Hub unit, and which are currently being trialed in other Cities and Boroughs. These include air quality sensors through our collaboration with the Company airly⁵; pedestrian flow monitoring to enable Councils to better understand people movements and flows within their area; in built CCTV cameras to supplement local provision. Technological advances are driving the development of a range of functions that can be incorporated into street furniture to enable local authorities to better understand and plan for changes in the urban environment. All these capabilities are funded by the advertising revenue from the single display on the Hub unit, 50p in every £1 of which is reinvested in furniture to support public services.

Defibrillator

A notable addition to the Hub unit which is unique to traditional street furniture is the integral defibrillator. Since 2019 the applicant has worked in partnership with the Community Heartbeat Trust (CHT), a registered charity that promotes the provision of defibrillators in public spaces, see **Appendices F & G**. Cardiac arrest is a real issue for all communities with over 100,000 heart related hospital admissions each year. Cardiac arrest survival rates are 70% if a defibrillator is used within five minutes, and every

⁴ The maximum night-time limit for advertisements under 10m² in City Centres as recommended by the Institute of Lighting Professionals March 2023

minute of delay reduces the chance of survival by up to 10%. Each Hub unit is equipped with a defibrillator as standard and available 24/7, which is provided and maintained by the applicant and added to WebNos, the National register of publicly available devices. Instructions of how to activate and use the device can be displayed on screen in various languages and local training is organised through CHT and funded by the income from the commercial display, to ensure that when needed, this equipment can be quickly deployed to save a life. These associated facility or services are available for public use and without charge for the purpose of making the provision of the communication network possible.

In respect to sustainability, JCDecaux's Research and Development team has undertaken studies on the adaptation of existing systems for energy reduction. There has been significant progress in the selection of energy efficient electronic components, the adaptation of software layers and the integration of solar energy, which are now imbedded in the Hub unit design. In 2020 the Company joined RE100, a global leadership initiative for companies committed to 100% renewable electricity, which powers all our display screens. Digital technology now represents a viable alternative to the printed form of displays and is a more environmentally responsible means of roadside display. The digital SmartScreen product incorporates Power Factor Correction (PFC) technology to maximize the efficiency of all power connections. The units are RoHS approved and completely devoid of hazardous materials making them easier to recycle at end of life in accordance with the WEEE directive (Europe) on the recycling of electrical and electronic waste⁶.

Public Safety and Use of the Network

Discussions with the Metropolitan Police has highlighted the common challenges of anti-social behaviour in towns and cities across the UK. Issues that are specific to the misuse of telecom apparatus is of particular concern, not just in Camden, but across London and main UK Cities. As a result of our discussions with the Met Police Design Out Crime Officer (DOCO), we have adopted a Management Plan which is intended to set out the

⁵<https://airly.org/en/>

⁶ **Appendix H** Sustainability

controlling measures we will employ governing the use and functions available in the kiosks and across the entire estate.⁷ The Management Plan is designed to adapt over time to address currently unforeseen challenges. To the end JCDecaux is committed to continuing the constructive dialogue with the Met Police and to react to issues as and when they arise.

The display screen on the reverse of the unit will be used for commercial and community messaging. The space will therefore be made available to support the role of the Police and other local public agencies in crime prevention and public education to a maximum of 5% of screen time⁸.

Policy Considerations

National Guidance

The National Planning Policy Framework 2023 (**NPPF**) sets out the Government's planning policies for England and how these should be applied. The framework reaffirms the role of the planning system in supporting sustainable forms of development. Advertising plays an important role in a diverse and vibrant market economy by encouraging consumer confidence and spending, which contributes to sustainable economic growth. Advertising is also an essential support for business through the promotion of products and services. The use of land for advertising purposes is therefore consistent with sustainability aims and support of a viable market economy. In respect of advertising the NPPF states that.

“The quality and character of places can suffer when advertisements are poorly sited and designed. A separate consent process within the planning system controls the display of advertisements, which should be operated in a way which is simple, efficient and effective. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.”⁹

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:

⁷ **Appendix I** Management Plan

⁸ **Appendix J** Police Campaigns

“Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. Policies should set out how high-quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments”

Furthermore paragraph 122 confirms:

“Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system...”

Part 12 covers the importance of design in managing and improving spaces and the quality of place. The design of all built form, including street furniture, must be sustainable and functional but also attractive and include innovation in the design evolution. Paragraph 131 says:

“Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”

On design, the Framework states that:

“Planning policies and decisions should ensure that developments:
f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”

Overall it is considered that the proposal 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 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;

⁹ Para 141

“...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.”

In summary it is the view that the proposed updating of the telephone call box would be supported by guidance and policy. It is also considered that the planning merits of the change has already been assessed by the Secretary of State and considered an appropriate form of development in this location and within the context of the site surroundings.

I trust that the above and enclosed documents clearly explain the nature of the proposal but please call me if there are any further matters on which you may need clarification.

Yours sincerely,



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Director of Planning

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Enclosures

Application Documents

- Covering Letter
- Appendix A 2023/4643/A Decision Notice
- Appendix B 2023/2990/P Decision Notice
- Appendix C Appeal Decision Notice 2022
- Appendix D Unit Comparison @ 1:20
- Appendix E Hub Unit Specification
- Appendix F Who is CHT
- Appendix G Zoll AED Device
- Appendix H Sustainability
- Appendix I Management Plan