

30 July 2020

Manchester City Council
City Centre Team – DM
P.O. Box 532
Town Hall
Manchester M60 2LA

F.A.O. Christopher Smith

Dear Chris,

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

Re: The Replacement of 26 Payphone Kiosks with a Network of 17 Communication Hubs in Manchester City Centre

Please find enclosed applications submitted under the provisions of the above Act and Regulations which seeks Planning Permission (PP) and Advertising Consent (AC) to replace 26 existing phone boxes and install 17 state of the art communication hubs, in accordance with the details presented under Pre-App response dated the 16th July 2020¹.

Background to the Proposal

This covering letter concerns 17 separate applications for PP and AC, which are essentially linked as one overarching Proposal to rationalize and update the existed pay phone provision within the City Centre. The Proposal will see the complete removal of 26 old style, single function, phone boxes and their replacement with a fewer number of modern communication hubs evenly distributed across the City. The rationalisation and improvement to the existing estate will provide real public benefits, not only in terms of the look of City streets through the decluttering and removal of outdated furniture, but also in terms of what these units can offer residents and visitors to Manchester. The development of a network of Hub units incorporating a range of communication and digital functions will allow people to stay connected and stay safe. This Proposal will assist in the ambition to make Manchester a digitally connected, World-class, regional capital smart City.

¹ Appendix A Pre-App Response

This Proposal has been under development for almost two years, in which time the communications industry has changed markedly and evolved to address societal and legislative challenges to the demand for a reliable communication infrastructure. The applicant's own aspirations align with the Council's aim for a smart, connected City. We also recognize the aim of Manchester, shared by many World Cities, to declutter the public realm and reduce the amount of furniture and thus provide a more open City accessible to all. The promotion of design excellence is also a shared aim as is the recognition that it is a key component in creating a sense of place and inspiring cityscapes that brighten and enrich people's lives.

The communication Hub is a new product for JCDecaux but one that embodies these key principles of good design, multifunctional capabilities, sustainability and innovation in product development.



Quality, aesthetics, functionality and environmental performance are the main features of JCDecaux furniture, qualities that are recognized through the shortlisting of the Hub unit in the IMEA 2020 Awards. The IMEA Awards identifies and rewards Companies, teams and organizations that have developed innovative solutions to deal with urban challenges. The Hub unit is shortlisted in two important categories; on the integration of sustainability principles into the unit design; and in its potential as a platform for social and community engagement and inclusion.

The Proposal

The applicant has worked closely with Manchester City Council Planning and Highway Officers to ensure the Proposal strikes the balance of providing the right number of connected Hub units evenly distributed across the City Centre and to locations that have the appropriate context and scale of development so as not to harm important interests. Several meetings and site tours have taken place with Officers over the year

which have proved instructive and led to changes to the positioning of each Hub unit and importantly to a reduction in the overall number, which are now the subject of applications². As part of the Proposal, notwithstanding the reduction in unit numbers, the applicant has agreed with the Officer recommendation to remove all of the 26 existing and outdated phone boxes in Manchester³. The Proposal will result in a net reduction of nine phone boxes, with the currently occupied pavement being reinstated and brought back into public use. Discussions with Greater Manchester Police (GMP) at the Pre-App stage has also greatly assisted in understanding the unique challenges that face the City and led to a reappraisal of how the Hubs can be managed to ensure they do not undermine the efforts to make Manchester a safer City. On the contrary, the current Proposal will seek to assist that endeavor by allocating space of all of the new display screens to be used by GMP for public announcement and alerts.

It is understood that street furniture, transport advertising and billboards are all part of a wider urban landscape, influenced by local needs and local communities. Public mobility, visibility, quality, efficiency as well as the image of the City are key factors that have been considered through this Proposal, with the desire to work closely with the local authorities to make the Hub units and asset for the City. JCDecaux is an out of home media Company that has for over 50 years played a role in transforming urban landscapes throughout the World through a range of well-designed street furniture. Visual communication is the cornerstone of the business and now extends to other forms of communication and to improving connectivity using digital media and messaging platforms. The aim of the business is to seamlessly combine a range of communication formats that deliver high-quality and innovative communication opportunities. Our Company is experienced and adept at bringing forward proposals that are sensitive to the local context and respectful of the heritage of Cities and historic buildings. The guiding principle is to ensure that all items of street furniture enhance the space and improves the public realm through design, innovation and function.

In respect of Manchester our plans are for the installation of 17 of these multifunctional Hub units located at key thoroughfares and junctions across the City, with the backdrop of retail/commercial activity. One of the aims of the Proposal is to help create modern, connected infrastructure in the UK that is fit for the 21st Century, whilst delivering an attractive, safe and inclusive high quality public realm. The

² Part 1 Plan B

³ Part 1 Plan A

proposed Hubs will serve as portals to enable the public to access the digital network without charge when out of home, and to complement the existing public use provision of Wi-Fi 4G/5G across the City Centre.

National Policy support for making UK Cities World class in terms of digital infrastructure is found in the National Planning Policy Framework (NPPF). The proposed network of communication Hubs within Manchester is one step towards realizing that aim. With advances in screen technology and the growth in digital media, new and innovative forms of communication platforms continue to emerge. The traditional role of the telephone box seems ill equipped for the modern digital environment. The multifunctional Hub unit has been designed to bring this public service up to date and is the next generation of communication provision that gives more to the public and contributes to the vitality and vibrancy of the City. We recognize that development must be carefully managed to avoid resulting in a plethora of discordant and unsympathetic furniture that detract from, rather than enhance, the look and quality of the street. This aim has influenced the Pre-App discussions and evolution of the Proposal, resulting in the 35% reduction in the number of units across the City.

Detail on the Hub Unit

In 2018 JCDecaux became a Communication Code Operator with the purchase of the phone Company Infocus Networks Limited. Since then, the Company has applied its extensive experience and ability to innovate in designing and developing a multi-functional unit for the digital age. The rise in mobile phone use has corresponded with the decline in the use of the traditional public payphone. Many of the existing kiosks remain a legacy of the past and a blight on our streets. Through misuse and abuse, poor maintenance and vandalism, the reputation of public payphones is poor and use declining. The time of the ubiquitous single use phone kiosk is over, however there remains the desire to stay connected when out of home and provide the means for people to engage with public bodies and vice versa. Data from recently installed Hub units in the UK demonstrate the public appetite for and uptake in the use of the services provided by the Hub. The JCDecaux Hub unit has been designed to replace the traditional phone box with an accessible, functional and useable alternative that can adapt to new and emerging communication platforms. The Company has invested in interactivity technologies with the development of service and advertising platforms using open source Android technologies, GPS, NFC and the integration of social networks.

The Hub provides an opportunity to offer innovative services to the public based on the solutions used in Paris as part of the response to the Call for "Intelligent Urban Furniture" Project. Other services and provisions include free ultrafast Wi-Fi, free phone calls to landlines and charities, defibrillator, wayfinding, device charging, rapid connection to emergency services, public messaging capabilities, and a platform for other technologies such as environmental conditions, CCTV and key data. These innovations are implemented against the backdrop of energy savings to comply with the climate emergency, with all units powered by green electricity and lit using high-capacity batteries, powered by solar energy. Research is ongoing into new technical solutions around the themes of Intelligent City, Big Data and Open Data adapted to the urban environment. The touchscreen facility will incorporate links to identified local charities relating to mental health, homelessness and child protection. Currently under development is voice activation, which will be particularly helpful for those with disabilities but also, in a post Covid 19 World, will ultimately enable calls to be made and browsers to be opened by voice command and without touching a screen or the use of a handset.

The Hub is considered the type of development supported by the Government's Statement of Strategic Priorities⁴, which articulates the aim of creating a World class digital infrastructure in the UK. The provision of the network and communication apparatus is entirely funded by the revenue from the advertising on the unit, which is confined to the reverse of the Hub. The communication equipment will enable the Council to extend the provision and harness the benefits of a connected City for workers, residents and visitors.

Application document Part 2 provides the detail on the dimensions of the Hub unit and an illustration of the range of functions it can provide beyond telephony and that of an advertising platform. Each unit will stand at 2.6m in height and 1.3m wide, equal to the standard 6 sheet size unit, and occupy a site area of less than 0.50m². The unit has undergone rigorous testing in extreme conditions and can boast 13.5mm thick antivandal toughened safety laminated glass on all glazed surfaces. The other external elements have been treated with a nanotech surface treatment to enable easy removal of stickers and/or sprayed paint to the external surfaces. The unit has a protection rating against impact of >IK10. All electrical circuitry is inaccessible to the public and the unit features hidden fixings that require specialist tools to enable access.

The unit will feature on one side an 86" screen and on the other a 32" touchscreen. The method of display for both the screens will comprise the latest high definition LCD product with the luminance level adjusted via an inbuilt light sensor and limited to a maximum 600Cdm² at night time⁵. The digital SmartScreen product incorporates Power Factor Correction (PFC) technology to maximize the efficiency of all power connections. The units are RoHS approved and completely devoid of hazardous materials making them easier to recycle at end of life in accordance with the WEEE directive (Europe) on the recycling of electrical and electronic waste. The units will be powered using Green energy, providing a 50-70% reduction in electricity consumption compared with traditional fluorescent and incandescent forms of lighting. The size of the screen is uniform and provides a display area of approximately 1.9m², which will be used for commercial and community/GMP messaging. When not in use the 32" screen will default to the City map to enable people to find their way around Manchester and shortcuts to the most often used apps and links to local services. A touchpad is

⁴ Statement of Strategic Priorities for telecommunications, the management of radio spectrum, and postal services July 2019 Department of Digital, Culture, Media and Sport.

⁵ The maximum night time limit for advertisements under 10m² in City Centres as recommended by the Institute of Lighting Professionals

position 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.

A notable and unique element of the Hub unit is the integral defibrillator. Since 2019 JCDecaux has worked in partnership with Community Heartbeat, a registered charity that promotes the roll out of defibrillators in public spaces, which made them the perfect partner for this Proposal. Cardiac arrest is a real issue in all communities with over 100,000 hospital admissions each year. A heart attack can happen to anyone and anywhere and so the survival rate is just 1:10, yet the early use of a defibrillator can triple the chances of someone surviving an attack. Each Hub unit is equipped with an easy to use defibrillator and local training can be organized through Community Heartbeat, funded by JCDecaux, to ensure that if needed this equipment can be quickly deployed to save a life.

Finally, in terms of sustainability policy, JCDecaux's Research and Development team has undertaken studies on the adaptation of existing systems for energy reduction and the use of green energy. There has been significant progress in the selection of energy efficient electronic components, the adaptation of software layers and the integration of solar energy, which are now imbedded in the Hub unit design. Last year the Company joined RE100, a global leadership initiative for companies committed to 100% renewable electricity. The Company's objective is to source 100% of its electricity consumption from renewable electricity by 2022. The switch to buying green electricity started in 2014 and by 2018 69% of the Company's electricity needs were met using renewable electricity compared with 37% in 2015.⁶

Use of the Hub Services

It is our aim to assist the City to become a smart connected City and for the Hub units to form part of the 5G delivery across Manchester. Of equal importance is the need to ensure the Proposal does not exacerbate the present situation or provide a platform that is too easily abused. Experience of GMP has shown that some of the existing communication apparatus within the City Centre are the subject of abuse and misuse for purposes other than those for which they were intended. The issues would seem to centre on the inability to manage calls and lack of regular maintenance of the equipment. It became clear during Pre-App meetings that an unrestricted "free to use" service is likely to fuel the current problems faced by GMP with anti-social problems in the City Centre at night. It remains our aim to provide a free phone, internet and device charging service for the wider public, however we look to continue to work

⁶ Part 3 Sustainability Aims and Objectives

closely with GMP and implement a more restricted use policy for Hub units located in known problem areas, as identified by GMP. In those locations, and for these specific hub units, there will be a prohibition on any free calls, other than emergency help lines and a limit on the free charging period as an emergency facility where, for example, a person's mobile phone is low on power and needs a short charge to use. This function is super charge capable for a short duration using USB Power Delivery 3.0 PPS (programmable power standard) and designed around a charging pocket.

By applying more stringent controls over in problem areas it is anticipated that the potential for these units to be misused will be minimalized or eliminated entirely. The prohibition on free calls to mobile numbers should also reduce the tendency for these services to be used to facilitate unlawful activity. Further management measures are also possible and are flexible enough to adapt to changing circumstances, actual experience and on advice from GMP, where misuse is suspected. Such measures can include the following;

1. Automatic block where the same number is frequently called from a Hub unit
2. The provision of built in CCTV security camera

In all other locations the phones will be a free to use service via a contactless method of payment, to landlines, to charity helplines, such as Shelter, Samaritans, Childline; emergency services and reverse charged outgoing calls. The installation and future operation of the Hub units will be managed and monitored in co-operation with the City Council and GMP. The Company is committed to proper management of the service the Hub units provide and will constantly review and adopt best practice to design out the potential and opportunity for crime.

The display screen on the reverse of the Hub unit is intended to be a platform for a range of messages, not solely commercial advertising. All of the 17 screens will be available to GMP during the peak night time hours for public announcement, alerts, available helplines and provide a point where assistance is at hand. All of the units incorporate emergency service speed dialing as standard. The display screens will also be made available for community content from the City Council and other affiliated City based trade bodies. The screen time can be used to inform residents and visitors about local services, local events and news, and to promote Manchester as a world class location for people to live, to invest, to visit and to work.

The Application Sites

The City has been extensively surveyed to produce the most appropriate spread of hub locations by utilizing some of the existing sites and altering then where appropriate to fit pedestrian flow and street type. A total of 21 locations were initially identified, which was revised to 17 through the Pre – App process. Various site visits and meetings took place with Planning and Highway Officers to look at each of the proposed sites. Each was assessed on the planning merits, mindful of the local context and character. The Highway assessment examined the proximity of the Hub unit to road junctions and crossings and avoiding areas where drivers need to take special care or where the pavement widths were too narrow. A network of 17 locations would create a comprehensive and rational distribution across the most travelled parts of the City Centre where people are most likely to see and use the Hub unit.⁷

The sites are set within the Centre of the City and their surroundings share a common commercial/retail context where advertising imagery would not appear out of place or unusual. The site locations are also heavily trafficked and follow the most popular pedestrian desire routes through the City. Where possible, the widest area of footpath has been chosen so as not to interfere with existing and established pedestrian flows as agreed by City Council Officers⁸. The 17 sites are located within those parts of the City that are less sensitive from a heritage perspective and far removed from the nearest residential buildings, where outlook could be affected.

⁷ Part 1 Plan 2 – Proposal Sites

⁸ Appendix A – Pre-App Response

Material Considerations

The application is submitted under the provisions of the 1990 Act and subordinate Regulations and so concerns both Planning Permission for the physical elements and communication use, together with Advertising Consent for the display of advertisement on the rear of the Hub Unit. The advertisement comprises an LCD screen that shows illuminated static images that automatic change by means of a remote server. The advertisement is not designed to display moving content and the lighting level is capable of adjusting to ambient lighting levels during the day and pre-set to ILP maximum level during the hours of darkness. Should the unit malfunction the screen will switch off and automatically alert the Digital team of the fault.

Policy Considerations

National Guidance

The Government's approach to development management is set out in the **National Planning Policy Framework** (NPPF) issued in July 2019. The guidance must be considered in preparing local plan policy and is a material consideration in planning decisions. The NPPF places the principle of sustainable development at the heart of the planning system and identifies three pillars that touch on the way the planning system is expected to achieve sustainable development; which are economic, social and environmental impact. The NPPF also applies a presumption in favour of development that can assist in meeting the sustainability aims.

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 112 states that;

"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 116 confirms 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...”

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 states that;

“In determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.”

Paragraph 131 provides the only statement that specifically relates to advertising proposals and repeats in substance the principle considerations that apply and 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”

On design the Framework states that;

“The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.

It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.”

Core planning principles in the NPPF which are relevant to the proposal include, amongst other criteria, the advice that the planning process should;

- *“ not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives;*
- *always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;”*

Under these and other core principles the Framework suggests that decisions should follow the following approach;

“Planning policies and decisions should aim to ensure that developments:

- *will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- *establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;*
- *create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion;*
- *and are visually attractive as a result of good architecture and appropriate landscaping.”*

The NPPF also recognises the importance of communication infrastructure and supportive of the overall objective of the proposals, which would see the rationalisation and improvement of the infrastructure by providing multifunctional apparatus that supports wider connectivity and improves the service to the public. The NPPF states that;

“Advanced, high quality communications infrastructure is essential for sustainable economic growth. The development of high speed broadband technology and other communications networks also plays a vital role in enhancing the provision of local community facilities and services”

More generally, relevant core planning principles of the NPPF include the aim of securing high quality and reliable digital infrastructure and encouraging vitality in urban areas, both of which are embodied in the Proposal. As far as the aims of NPPF are concerned, the Proposal for Manchester is considered to be supported by policy guidance.

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 sets out 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.”

The 2007 Advertisement Regulations exist pursuant to s220 of the 1990 Act. The 2007 Regulations create a separate self-contained code set apart from mainstream planning controls. Regulation 3 states that;

- ‘1. A local planning authority shall exercise its powers under these Regulations in the interest of amenity and public safety, taking into account –
 - a. The provisions of the development plan, so far as they are material;*
 - 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’***

The impact on visual amenity is assessed in light of the character of an area, which includes the nature and type of surrounding land uses and the existing built form within the particular locality where the proposed advertisement is to be displayed. It is the impact upon local character and any particular feature of interest that the proposed advertisement is appraised.

As to public safety the primary consideration is the effect of an advertisement display on drivers and pedestrians seeing the advertisement in the particular location. It is accepted that advertising is intended to be seen as it is a visible media, but it doesn't automatically follow that roadside advertisements are distracting. Advertising is often part of the fabric of City Centres and busy routes where drivers and pedestrians have a high expectation of seeing commercial images and messaging. Manchester City Centre is an example where the vibrancy and activity of the City is part of its character and all of the proposed locations are concentrated within that retail core.

Amenity

JCDecaux has built its reputation on delivering innovative, attractive concepts by calling upon a wide range of experts. JCDecaux has worked with over 50 world-famous architects and designers on projects in cities across the world. These include: Gae Aulenti in Turin, Robert Stern in Chicago, Jean-Michel Wilmotte in West Hollywood and Lord Norman Foster in the UK. Street furniture can be found in cities from San Francisco to Paris and Sydney from leading names such as Philippe Starck, Mario Bellini, Philippe Cox, Patrick Jouin, Knud Holscher, Martin Szekely, Peter Eisenman, Christophe Pillet, Mathieu Lehanneur or Marc Aurel. The Company therefore embraces the concept that street furniture can contribute to improving the quality of our streets to make them safer, cared for and attractive. The streets within Central Manchester are busy, mixed use thoroughfares with a pronounced commercial presence, with many large scale commercial premises lining the streets, together with other forms of roadside advertisement. Manchester is also an important historic City with many unique and striking historic buildings and localities where development needs to be carefully considered, thoughtful and respectful of the City's local and national history.

The scale of buildings and character of the City Centre is varied, ranging from substantial commercial retail and office buildings to small scale shop premises. An element of residential use is also a feature of the City Centre, although typically confined to upper floors. The identified locations for the communication Hubs are designed to have a negligible impact upon the character and appearance of the City and are therefore confined to the size of a standard 6 sheet advertisement, which is a common feature of City and Town centres and supports the retail environment. The scale and proportions of the proposed advertisement is therefore designed to be at a human scale without overwhelming passers-by. The application sites are confined to a tight network in the busiest and most vibrant parts of the retail core. The units are also sited away from high value heritage assets to areas where the immediate local context could support this type of modern structure without harming important views or historic settings.

The integral advertisement on the Hub unit is elevated by 530mm above the pavement and intended to be visible principally to pedestrians but also to passing vehicular traffic. The advertisement needs to be visible but designed to complement the street layout without appearing intrusive or out of place. One of the primary aims of policy is to ensure a high quality of design and conformity with the general principle of

safeguarding amenity and public safety as contained within national guidance. Overall the Proposal would accord with policy guidance and will not harm local visual amenity.

Public Safety

Public safety issues are concerned with the effect an advertisement would have on drivers and pedestrians and whether the position of the advertisement or the manner of its display is likely to be so distracting or confusing as to endanger the public. The advertisements affixed to the Hub unit are prominently positioned on the public footpath to be readily visible when approaching either on foot or by vehicle. The main audience will be pedestrians although a few will also be visible to drivers. The proposal sites have been chosen where the width of the available footpath is sufficient to accommodate the unit without obstruction or an unacceptable narrowing of the available pavement. The prominence of the sites will provide ample opportunity to people to see the simple messages on display. The same is true for drivers, who will see the displays alongside busy active street frontages and so are less likely to present a distraction when in this visual context. As mentioned earlier the character and setting for each location is overwhelmingly commercial, with brightly lit shop fronts and other premises forming the immediate backdrop.

For those sites visible to vehicular traffic the approaches are along roads with a low speed limit and where there isn't a heavy burden on a driver's concentration. By the time a driver sees the application site he/she will have travelled through the City Centre and passed many commercial premises and other roadside attractions. A driver's expectation of seeing advertising imagery is therefore already very high and consequently reduces the potential for a driver to be confused or distracted.

Local Policy

Three Development Management policies from the Manchester Local Plan are relevant to the Proposal.

DC 15 Advertisements Hoardings and Posters

This Policy repeats in substance the material considerations set out in the 2007 Advertising Regulations. The dual criteria of visual amenity and public safety are recognized, as is the requirement for advertising schemes to respect their context and the scale of built form within the general locality. The 6-sheet advertisement on the rear of the hub unit is a standard size of displays often found within pedestrian areas and retail streets. The Proposal sites are located away from sensitive aspects to parts

of the City where the presence of roadside street level commercial images is commonplace.

DC 17 Telecommunications

This Policy adopted a presumption in favour of development that enhances the City's communication infrastructure provided the locations respect residential locations and particularly sensitive areas within the City. This Proposal has been formulated and altered in light of the Pre-App discussions in order to meet this policy standard.

DC 22 Footpath Protection

This policy is intended to ensure that all new development is assessed in terms of the impact upon existing routes and the free movement of pedestrians around the City. The Proposal accords with this policy in several respects, but principally in the rationalisation of the existing kiosk estate. The permanent removal of nine kiosk and the reinstatement of the footpath will have a beneficial effect on pedestrian movements and release areas that are currently occupied by fixed apparatus. In terms of the existing locations that are being updated, the difference between the footprint of the old-style unit compared to the Hub unit is also significant. The Hub unit incorporates a high-level PV canopy however it has a slender profile and occupies one third of the space occupied by the existing kiosk. In terms of the new locations, each site has been assessed in line with the City Council's Highway standards, those sites that were considered to unacceptable narrow the footpath or adversely impact pedestrian movement were excluded from the Pre-App submission. In all cases the pavement widths are generous and capable of accommodating the Hub unit without harming free movement or restricting pavement space.

One issue not covered by the Policy but raised in the Pre-App discussion was the standard of remediation and reinstatement of the public footpath associated with the removals, new installation and altered foundations. It is understood that the quality of reinstatement work by Statutory Undertakers can vary and has been an issue in the past. The Company is fully committed to ensuring the quality of all out installations are exemplary and have worked closely with other Highway Authorities in the UK to maintain a high standard of workmanship. Attached at Part 4 of the application documents is an example of a recent reinstatement following the installation of a foundation for the Hub unit in Birmingham.

The proposed development would be consistent with both national and local policies regarding advertisement control, including local policy.

Conditions

The mechanism exists within the planning system to provide a level of control over the manner and use of roadside advertising in the interest of amenity and safety, as expressed in the Regulations. All consents for express advertisement consent are covered by the standard conditions set out in Schedule 2 to the Regulations and are accepted.

Additional conditions are suggested and reproduced at Appendix B and seek to limit the manner of use of the display screens in the interests of public safety. The conditions include a maximum night time luminance level of 600Cdm², to accord with the ILP recommendations. Digital technology is by its nature a more sustainable and versatile method of display images and messages in real time and in cases of emergency. JCDecaux fully accepts that this functionality could and should be used to create safer streets and places. We are therefore committed to working with local authorities, including GMP, to ensure our apparatus is designed and used in a way that assists in reducing crime. The suggested condition provides the means to ensure a cooperative future working relationship with the City Council and GMP and the flexibility to adapt the changing needs in Manchester.

Summary

The installation of the Hub units will see the removal of all of the existing older style Infocus phone boxes in the City, which will yield real benefits in terms of visual amenity and the appearance of the streets. Overall it is considered that the Proposal will make a positive contribute to Manchester City Centre, by introducing high quality, visually attractive and functional smart furniture, to support the modern ambitions of the City Council. The UK is currently leading the way through the introduction of digital communications and provision of free publicly accessible platforms, but many other main Cities are moving in this direction. The Proposal should therefore be seen as an early step in the digital transformation to help Manchester achieve the aim of a smart City.

The proposed Hub unit has been designed and the Proposal refined in light of the Pre-App discussions, to ensure the units integrate successfully within the City Centre. We have worked in partnership with the Council and GMP to address concerns and anticipate potential issues. The investment in modern, cleaner and greener technology and rationalisation of the existing estates is a progressive approach that creates a positive impression of the City and embraces sustainable development through exciting and new media formats.

We look forward to continuing our constructive relationship through to the implementation of this Proposal.

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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Enclosures

Application Documents

- Part 1 Proposal Background and City Map
 - Plan A Map of Existing Kiosk Estate
 - Plan B Map of Proposed Hub Locations
- Part 2 Hub Detail and Examples
- Part 3 Sustainability Aims and Achievements
- Part 4 Pavement Remediation

- Appendix A Pre-App Response
- Appendix B Suggested Conditions