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9th March 2026

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
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
Paraguay
Peru
Poland
Portugal
Qatar
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

Wrexham County Borough Council
Planning Services
15 Lord Street
Wrexham
LL11 1LG

Our Ref: **A03012-13**

Dear Sir,

Town and Country Planning Act 1990
The Town and Country Planning (General Permitted Development) (Amendment) (Wales) Order 2019
Town and Country Planning (Control of Advertisements) Regulations 1992

Proposal: **The Installation of Communication Apparatus in Wrexham Town Centre**
Locations: **OS 48 Hope Street LL11 1BB**
OS 27 Regent Street LL11 1RY

This letter supports submissions under the above Act, Regulation and Order seeking the Council's prior approval to install two communication Hubs in the town centre and consent to display an advertisement on the rear of the apparatus.

The Hub unit is a modern expression of the public telephone service which now offers a range of functions for public use, which includes a 24/7 accessible defibrillator, free calls to landlines and free Wi-Fi connectivity. The apparatus also includes an advertised face affixed to the reverse of the unit. Further detail on the Hub service and its functions is contained within **Appendix A**. This proposal relates to two locations within the retail core of the town centre, where people are most likely to see and interact with the Hub units. These locations also provide the context where this type of furniture would not appear out

of place or conflict with the character of the surroundings commercial setting.





The submissions are twofold, comprising a prior notification relating to the communication unit and an application for advertisement consent. The Hub unit is essentially a communication apparatus and In Focus Public Networks Limited (IPN) is a licensed Electronic Communication Code Operator (ECCO). The installation, alteration or replacement of a Hub unit is a permitted development under the provisions of Part 24 of the General Permitted Development Order, but subject to the prior approval procedure to enable the Council to determine the need for permission. Consent for the display of an illuminated advertisement on the rear of the Hub unit is required under the terms of the Advertisement Regulations 1992.

Background to the Application

The development of the Hub unit is a partnership between JCDecaux and the telecommunication code operator IPN on whose behalf these applications are submitted. Unlike other communication operators

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such as BT or New World Payphones who operate an extensive estate of call boxes that are either redundant, poorly maintained or surplus to requirements, the IPN estate is modest by comparison. The Company's aim is to develop furniture that is best in class and public service focused. The Hub unit is the means through which the aim of redefining the perception and role of the traditional public call box is realised by combining a range of functions in a modern well-designed item of street furniture.

It is recognized that all development needs to be carefully managed to avoid creating a plethora of discordant and unsympathetic furniture that detract from, rather than enhance the look and quality of the street. The Company's guiding principle is to ensure our furniture, by design, technological innovation, and enhanced functionality, can have a positive effect on the public realm. This aspiration aligns with the Council's support for high quality public spaces and in making Wrexham a digitally connected Council[1] which uses the latest technology to make Council services accessible to all[2].

The use and application of modern digital technology can promote inclusivity and promote community connectivity and support the retail function for the benefit of residents, visitors and businesses alike[3]. Support for the development of digital infrastructure is found with the PPW and seen as a contributing factor in maintaining the economic well-being of Wales and enabling people to connect and interact with each other, either in person or electronically. The provision of reliable communication infrastructure, such as the accessible Hub unit, is one step closer to realizing that ambition. Technology is a valuable tool in ensuring communities stay connected and in providing inclusive access to Council services and online provisions.

[1] **ICT and Digital Strategy 2024-2027**
[2] **Appendix B Community Channel**
[3] **Planning Policy Wales (PPW) Edition 12 2024**

The policy document recognises the possibilities for digital technology and smart data to target funding and open channels of communication. 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 is ill equipped to keep pace with the modern digital environment. The proposed Hubs will function as portals to enable people to access digital networks, whilst the advertising screen will promote the retail function of the centre to draw visitors and shoppers alike.

Good design is a shared aim and recognised as a vital 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 for IPN and one that embodies the principles of good design, sustainability and innovation in product development. These attributes are the key 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 categories on the integration of sustainability design principles and the ability to enable social and community engagement and inclusion.

Development Detail

The specification of the Hub Unit is included at **Appendices A and H** and provides an illustration of the overall dimensions and the range of functions provided. The Hub Unit is based on our "Forum" unit, which was designed by Fosters and Partners. The unit brings the IPN phone service up to date to include the next generation of communication provision which is free to the public. 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 0.4m^2 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 provision of the free to use services is funded by the revenue from the advertisement affixed to the rear of 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 town. 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 display comprises an ultra-HD LCD screen for outdoor use, making it visible in direct sunlight and able to automatically adjust to ambient changes by means of an inbuilt light sensor. During the hours

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of darkness, the light level on the displays screen is limited to a maximum 300Cdm^{2} [4] and switched off between the hours of 11:59 p.m. and 6:00 a.m., thus reducing energy use by 43%. This unit can show both static and dynamic content which is changed remotely via a secure feed every 8-10 seconds. The screen is primarily used to display commercial messages but can also include a dedicated share of time for community messaging via the Council's own community channel or as a platform to promote local safety campaigns[5]. Should the unit malfunction, the screen will switch off and automatically alert a dedicated digital team to schedule a repair visit.

Defibrillator

A notable provision that is unique to the Hub unit is the integral defibrillator. Since 2019 IFN with JCDecaux has worked in partnership with the Community Heartbeat Trust (CHT), a registered charity that promotes the provision of defibrillators in public spaces, making it the ideal partner for this proposal. Cardiac arrest is a real issue for all communities with over 100,000 hospital admissions each year. Cardiac arrest survival rates are 70% if a defibrillator is used within five minutes, and every minute of delay reduces the chance of survival by up to 10%. Each Hub unit is equipped with a defibrillator which is provided and maintained by the applicant and added to WebNos, the National register of available devices.

Instructions on 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. We have also worked closely with Save a Life Cymru in the development of the Hub estate in other Welsh towns and cities and I

[4] The maximum night-time limit for advertisements under 10m^{2} in City Centres as recommended by the Institute of Lighting Professionals

[5] Appendix B

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enclose a letter of support from the chair of the organization, Professor Len Nokes[6].

There are currently 350 Hub defibrillators on the Hub network across the UK, the following link provides more information on the development of the defibrillator network in Manchester City Centre through the Mayor's Office.

https://vimeo.com/946548301/22c51ae918?share=copy.

In respect of 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. JCDecaux is the only media company to join the RE100, a global leadership initiative for companies committed to 100% renewable electricity. 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.[7]

In conclusion on the matter of sustainability, the Company's Research and Development team has undertaken studies on the adaptation of existing systems for energy reduction. There has been considerable 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 design of the Hub unit. In 2020 the Company joined RE100, a global leadership initiative for companies committed to 100% renewable electricity, which powers all the display screens. The units are RoHS approved and completely devoid of hazardous materials making them easier to recycle at end of life in

[6] **Appendix I**
[7] **Appendix E**

accordance with the WEEE directive (Europe) on the recycling of electrical and electronic waste[8].

Use of Hub Services

The Hub units will assist in making Wrexham town a smart connected centre and enhance the 4G/5G delivery. Of equal importance is the need to ensure the Hub units do not inadvertently provide a service that is too easily abused. Experience has shown that many phone boxes across the UK and other main cities are used for purposes other than those for which they were intended. The issues centre on the lack of proper management of calls and regular maintenance of the equipment. Any free to use service has the potential to be abused by a small minority, however it remains our policy to provide a free service for the benefit of the wider public in phone, internet, and device charging.



GM Police Crime Awareness Campaign in Manchester City Centre

The phone service will be free to landlines and charity helplines, such as Shelter, Samaritans and Childline. Emergency service speed dialing

[8] **Appendix E**

is also standard for all Hub units and reverse charging for outgoing calls will also be available. The Company is committed to the proper management of the service and future operation of the Hub units will be managed and monitored in co-operation with the Council and local law enforcement agencies. The use and functions of the Hub units will be constantly reviewed and the management plan[9] adapted to best practice to design out the potential and opportunity for crime.

The display screen on the reverse of the Hub unit is designed to be used to display a range of messages, not only commercial advertising. Through our work with LG Comms, 5% of the screen time is dedicated to community messaging free of charge. The city Council can use the screen for the purpose of public announcement or to heighten awareness of an issue of community concern in the local area. The screens can be used to inform residents and visitors about local services, local events, and news or to simply promote the city as a safe and connected place for people to live, to invest, to visit and to work.

The Application Sites

As stated, the proposal for Wrexham town centre is modest and comprises only two locations, on Hope Street and Regent Street. Both streets are within the retail centre of the town and the surrounding buildings and area character is consistent with the retail dominance of the area. The provision of the type of modern interactive street furniture is appropriate to the respective High Street type of locations where the level of activity and people movement is high, and where the street is well lit and well traversed throughout the day and night.

The application sites have been identified as two of the most travelled thoroughfares within the town centre where people are most likely to see and use the Hub unit and are sufficiently distanced from each other as not to give rise to any claim of street clutter. Each site has been assessed in planning terms, mindful of the local context and

[9] **Appendix G**

character. The safety assessment examined the proximity of the Hub unit to road junctions, crossings, and areas where drivers need to take particular care and found to be acceptable. The proposal sites are on busy pedestrian routes where the footpath width is sufficient to accommodate the Hub unit without impeding the free movement of pedestrians. The detail for each site is included with the application and includes OS extracts and site visuals.

Material Considerations

The applications are submitted under the provisions of the 1990 Planning Act and Advertisement Regulations.

National Policy Guidance

The 12th edition of Planning Policy Wales 2024 (PPW) sets out the Welsh Government's planning policies for the management of development in the public interest. The PPW maintains the role of the planning system in supporting sustainable forms of development and contributing to the wellbeing of Wales and local communities.

Of relevance to these applications are policies that encourage the creation of sustainable places, which encourage investment in the main commercial centres to make them places that are attractive to visitors and encourage people into the centre and maintain the viability and vibrancy of the retail centre. Advertising plays a key role in a diverse market economy by encouraging consumer confidence and spending, which contributes to sustainable economic growth. Advertising is also an essential support for business through the promotion of products and services which drive consumer spending. The use of land for advertising is therefore consistent with the aim of sustainability and its support for a viable market economy.

The safety and wellbeing of communities is an important aims of a sustainable planning system, which supports some of the key elements of the Hub unit. The provision of life saving defibrillators that are accessible 24/7 is a deliverable public benefit of this proposal, so too

the ready access to emergency services and town centre wayfinding that can contribute to a sense of safety and wellbeing, in the knowledge that when help is needed it can be easily accessed through the emergency button feature.

The PPW also recognises the importance of digital technology and advanced communications infrastructure not only to economic health but also social development by reducing exclusion and ensuring development are inclusive and accessible. Access to the digital environment and keeping people and public bodies connected is a fundamental element of this proposal as it enhances the communications network and provides services that are free to all. The design of any built form, including street furniture, is required to demonstrate sustainable and functional attributes whilst offering attractive and innovative designs to create better places in which to live and work. The evolution of the Hub unit design embodies these principles.

Technical Advice Note (TAN)

TAN 7 Outdoor Advertisement Control (1996) remains extant guidance and offers advice on how the Council assesses advertisement proposals. The TAN recognises that advertising is an important feature in stimulating a nation's economy and it advises against stifling original designs or new display techniques, a recognition of the dynamic and innovative nature of the medium and the evolving nature of digital communications, illustrated in the design of the Hub unit. The note reaffirms the provision of the Regulations and that controls over advertising displays is to be exercised only in the interests of "amenity" and "public safety".

Regarding public safety the Note is clear that a planning authority should have regard to the potential effect an advertisement would have upon the safe use and operation of any form of traffic or transport

on land (including the safety of pedestrians), on or over water, or in the air. In this case the primary audience for the advertisement is pedestrians visiting the retail centre.

It is accepted in the TAN that there is no requirement for an advertiser to demonstrate a need for a display and that factors which may be beneficial, not just harmful to amenity should be given sufficient weight in the assessment of each case. It is restated, although axiomatic, that all proposals for similar schemes are to be viewed in a consistent manner. In terms of advertisement locations, the note mentions that advertisements are less likely to be appropriate in predominantly residential areas, but that within commercial settings and areas, such as the centre of Wrexham, advertising is part of the fabric of the area and an expected feature within a retail setting.

TAN 12 Design (2016) contains the Planning Policy on design and supports the overriding aims presented in the PPW. Good design is inclusive design and the note requires all built form to be inspired by this principle and those of sustainable and enduring development. Buildings and structures need to be appropriate to their setting, convenient and functional, and accessible to all. It should also enhance the character and quality of the local environment. The design of the Hub unit and its manufacture embodies these principles through the choice of materials, which are devoid of all hazardous substances and entirely recyclable, to the accessibility of the unit to those with any form of physical impairment, to the use of 100% green energy to power the unit.

The design of the Hub unit is intentional understated and simple in concept. The use of darker tones and minimal footprint enable the structure to fit within an urban context without overwhelming views or competing with the scale and architecture of the locality. The units are to be located within wide areas of footpath and away from pedestrian desire lines and where possible in line with other items of future so as not to impede people moving around the town.

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Amenity

The scale of buildings at the proposed locations is varied, ranging from substantial commercial retail and office buildings to small-scale shop premises. An element of residential use is also a feature, although where present is confined to upper floors. The proposal sites have been chosen with regard to the character and appearance of the surroundings based on the view that the units would have a negligible impact of amenity. The design of the Hub unit is purposefully unassuming with the advertised area being the same size as on other street furniture such as bus shelters and roadside displays within urban areas.

The scale of the advertisement is appropriate to the pedestrian environment and will be used to support the retail outlets in the town centre and provide a platform for community messaging. The proportions of the advertising element is designed at a human scale without overwhelming passers-by. The application sites are located away from high value heritage assets to areas where the immediate local context is that of a busy and bustling retail environment where advertising and promotional imagery is commonplace. It is considered that Hope and Regent Street can support this type of modern furniture without harming important views or historic sensitivity.

The integral advertisement on the Hub unit is elevated above the pavement and intended to be visible principally to pedestrians. The advertisement needs to be visible but is designed to complement the street layout without appearing intrusive or out of place within the context of vibrant, lit shop frontages. One of the main 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 proposals would accord with policy guidance and will not harm local visual amenity.

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Public Safety

Public safety issues concern the effect an advertisement display is likely to 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. Only the Regent Street site adjoins a road, Hope Street is pedestrianised. The advertisements affixed to the Hub unit are prominently positioned on the public footpath to be readily visible. The main audience will be pedestrians although the Regent Street site may be visible to drivers, albeit fleetingly. The proposal sites have been chosen where the width of the available footpath is sufficient to accommodate the unit without obstruction or unacceptably narrowing the available pavement.

The prominence of the sites will provide the opportunity for people to see the simple messages on display as they pass by. Both sites adjoin busy active retail frontages and so are less likely to appear out of place or present a distraction or obstruction to the public. The approach to the Regent Street site is along a main route such that a driver will have travelled through a commercial street scene and passed retail premises. The expectation of seeing advertising imagery is therefore already extremely high and consequently reduces any potential for a driver to become confused or distracted. As such, the advert display would not appear incongruous or intrusive in this context.

Other Matters

One issue not covered by Policy but of considerable importance to the application is 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 for many local authorities. IFN is fully committed to ensuring the quality of installations is exemplary and have worked closely with other Highway Authorities across the UK to maintain a high standard of workmanship. Attached at **Appendix E** are examples of recent reinstatement works following the installation of a foundation for Hub units in Birmingham.

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The Proposal is an appropriate form of development that is consistent with both national and local policy on advertisement control, and supported through policy on the development of reliable digital infrastructure and the creation of safer streets.

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 it is proposed that the following special conditions should be applied to advertisement consent:

- The intensity of the illumination of the signs shall not exceed 300 cd/sqm from dusk till dawn.
- Any change in advertisement display shall be instantaneous.
- The displays shall not display any moving, or apparently moving, images.
- The advertisements displayed on each panel shall not change more frequently than once every 10 seconds.

Digital technology is by its nature a more sustainable and versatile method of displaying images and messages in real time and in cases of emergency. This degree of functionality could and should be used to create safer streets and places. We are therefore committed to working with local authorities to ensure our apparatus is designed and used in a way that assists in reducing crime.

Summary

The UK is currently at the forefront in the development of multifunctional digital furniture and the provision of accessible communication apparatus that provides more than simply a means to make voice calls. Many towns and cities recognise the value such development can provide in support for the delivery and accessibility

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of public services. The development of visually attractive and functional smart furniture supports the ambition of a greener safer and connected town centre.

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 faithfully,

Martin Stephens

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