

1. DETAILS OF THE DEVELOPMENT

Ref: 20/05696/PRE
Location: Various Locations – 158 Sites
Ward: All
Description: Replacement of existing Croydon bus shelters, freestanding adverts and larger column adverts with the provision of new bus shelters and advertising panels, providing an opportunity to embed ‘Smart City’ technology and to upgrade the existing paper advertising with digital advertising screens.
Applicant: Valo Smart City
Agent: UK Partnerships
Case Officer: Helen Furnell

2. PROCEDURAL NOTE

- 2.1 This proposed development is being reported to Planning Committee to enable Members to view it at pre application stage and to comment upon it. The development does not constitute an application for planning permission and any comments made upon it are provisional, and subject to full consideration of any subsequent applications, including any comments received as a result of consultation, publicity and notification.
- 2.2 It should be noted that this report represents a snapshot in time, with negotiations and dialogue on-going. The plans and information provided to date are indicative only and as such the depth of analysis provided corresponds with the scope of information that has been made available to Council officers. Other issues may arise as more detail is provided and the depth of analysis expanded upon.
- 2.3 Replacement bus shelters do not require planning permission as they benefit from permitted development rights (as set out in Schedule 2, Part 12, Class A (b) of the Town and Country Planning (General Permitted Development) (England) Order 2015). In theory they could be installed without involvement from the Local Planning Authority if they remain within the parameters for scale. However, as digital adverts are proposed to be incorporated in the bus shelters and the project also involves sites that are occupied by freestanding advertisements that are proposed to be replaced by digital advertisements, these all require Advertisement Consent (both the digital adverts on the bus shelters and the freestanding adverts).
- 2.4 The applicant is undertaking stakeholder meetings with Transport for London, the Metropolitan Police Service and various interested services within LB Croydon.

2.5 The report covers the following points:

- a. Executive summary of key issues with scheme
- b. Site briefing
- c. Place Review Panel feedback
- d. Summary of matters for consideration
- e. Officers' preliminary conclusions
- f. Specific feedback requests

3. EXECUTIVE SUMMARY

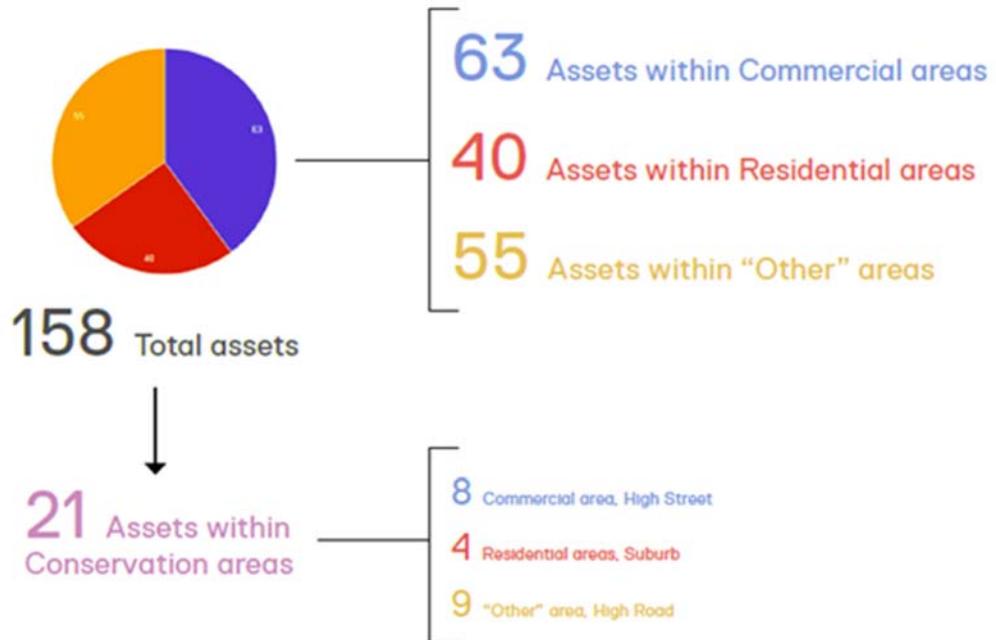
- 3.1 As a result of Croydon Council's contract with its existing advertising partner coming to an end, the Council is embarking on a new contract with a new provider for small format advertising across the Borough. The result of this is that the existing bus shelters and advertising panels will be removed by the previous partner. This requires the provision of new bus shelters and advertising panels and provides an opportunity to embed 'Smart City' technology and to upgrade the existing paper advertising with digital advertising screens.
- 3.2 Designs for the new bus shelters and advertising panels are at concept stage and a modular approach to different contexts and conditions is being developed.
- 3.3 This project is time critical, with the final designs of shelters required to be agreed by the end of March 2021. Following this, applications for advertisement consent for each of the 158 sites are required and it is anticipated that these will be submitted in batches.
- 3.4 The scheme has developed through a series of pre-application meetings with officers and consideration by the Place Review Panel (PRP) in February 2021. A summary of the Panel's feedback is included within this report.
- 3.5 The sites are in areas of varying character, including sites in both urban, suburban and town centre locations and are in a mix of commercial and residential locations. 21 of the sites are located in Conservation Areas.

4. SITE BRIEFING

- 4.1 All 158 sites cannot be individually described here however, it should be noted that all of the sites being looked at are currently occupied by either bus shelters or freestanding adverts. The applicant is not looking to propose structures in new locations. Sites also greatly vary in their conditions, character and complexities.
- 4.2 The bus shelters to be removed and replaced are LB Croydon shelters. TfL shelters would remain unaffected by the proposals. Of the existing sites, 110 are bus shelters, 42 are dual sided freestanding rectangular poster adverts and 6 are large freestanding column adverts. It is noted that of the 110 existing bus shelters that are proposed to be replaced, only 17 of these have existing real-time bus arrival 'countdown' information. The replacement bus shelters would all have this information as an integral part of the design.

4.3 A high level breakdown of the sites is shown below:

Assets location - General & Conservation areas

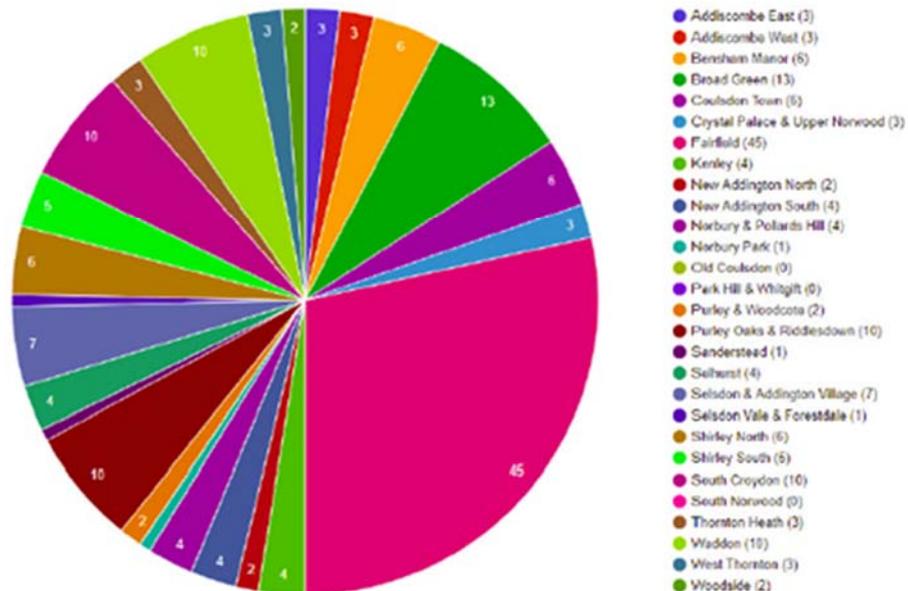


4.4 The sites are not evenly distributed across the administrative wards of Croydon, with a large proportion of sites located within the town centre:

Site analysis

Assets location - Wards

Assets no. per ward classification



4.5 These are some examples of the different types of locations:

Site appraisal overview

Parameters - Context

Commercial Areas



Residential Areas



"Other" Areas

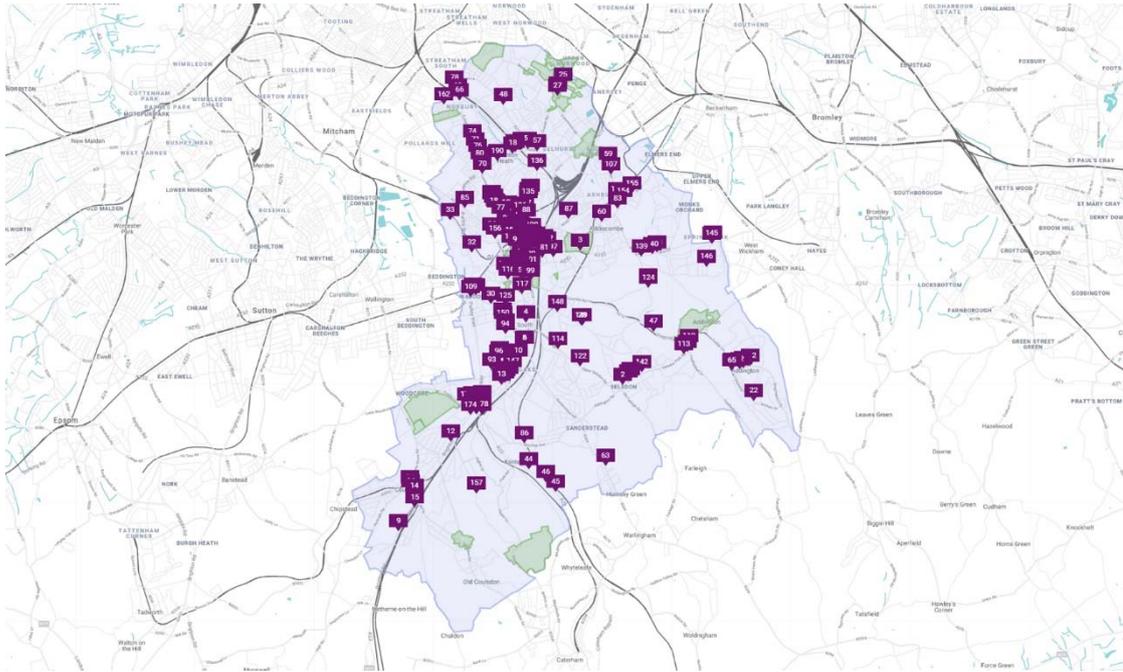


Relevant Planning History

4.6 There is no relevant planning history for the sites in question.

Proposal

4.7 The proposal is for the existing LB Croydon bus shelters and advertising sites to be removed and replaced with new bus shelters which will have integrated 'smart' technology and digital advertising panels and new digital advertising panels across 158 sites in the borough. The locations of the proposed bus shelters and advertising panels are shown below:



- 4.8 The proposed development will mean that these bus shelters will have the potential to contain items such as digital TfL/travel information, digital advertising, free Wi-Fi, 5G capability, data collection (environmental sensors/air quality information, footfall data etc.), P.A./speakers, and CCTV. The proposed digital advertising (both on the bus shelters and in freestanding advertisement locations), will mean that there is a revenue stream to pay for the replacement shelters, the cost of data collection and provision of services. This will also provide an important revenue stream for the Council. In addition, the Council will be provided with regular slots (10 seconds out of each 60 second cycle), for its own public service messaging.
- 4.9 The locations of the proposed replacement bus shelters are linked to the positions of the existing TfL bus stop poles and road markings, which are not proposed to be moved by this scheme. Whilst there may be some minor variations to existing shelter locations (in order to improve accessibility, for example), these will not be significant changes from the existing locations.
- 4.10 All of the proposed installations across the borough are proposed to be recognisable as being from one design family and a modular approach is proposed to allow the design to adapt to the specifics of each individual location.



4.11 Various options have been submitted for consideration for the bus shelter sites, as there are differing existing conditions – for example, a digital advert sited perpendicular to the shelter would not be appropriate in a location where there is a narrow pavement.



4.12 There are also options for the digital advert in terms of its scale. Most sites will include the standard sized digital advert.



4.13 However, in more sensitive locations or where space is limited, there is a pole mounted advertisement option.



4.14 The proposed bus shelters and digital adverts are proposed to be constructed from robust and durable materials. Discussions on the specifics of the materials is ongoing.

4.15 Whilst applications are not required for the replacement bus shelters, advertisement consent is required for the proposed digital adverts. It is understood that the applicant is intending to submit these applications in tranches, with the first tranche intending to be submitted in April 2021 and submissions continuing throughout the summer. It is intended that the first tranche of shelters would be installed in September 2021.

5. PLACE REVIEW PANEL FEEDBACK

5.1 An earlier iteration of the designs were presented to the Council's Place Review Panel on 25th February 2021.

5.2 The Panel's main comments were:

- They were supportive of the ambition to create high quality product with a long term interest. They welcomed the quality of product design proposed and encourage the Applicant to embark on the next stage of detailed design development, focusing on site-specific issues such as response to heritage, local infrastructure, microclimate etc. and respond to issues raised in this stage of design development.
- They advised that the Applicant should undertake a thorough historic analysis immediately assessing at the significance of heritage assets and their setting. It was strongly encouraged to engage with Historic England as a priority.
- They don't believe green roofs are necessary as part of the sustainability narrative. They would rather focus on the photovoltaic panels and moving towards self-sustaining structures.
- They welcomed the flexibility of the design and detachable advertising screens are one way to enable this. However, it would not be appropriate to have them detached in all instances – this should be determined on a site by site basis. The detail of how they are detached also requires resolution.
- They advised that different approaches to the display of real time information should be explored, in order to improve the legibility and accessibility and serious concerns are raised about the current proposal to have all information in a small screen parallel to the highway.
- They stressed that the design must be distinctive to Croydon, drawing on the sense of place and unique character of different areas. The Applicant was also encouraged to think about designing a typefaces / graphic style as this can form part of the identity.
- They supported a 10/60 second rule for displaying local information alongside advertising.
- They agreed that prototyping is extremely important. A number of stakeholders will need to feedback on the design and this should be factored into the program.
- Generally, they were concerned at the proposed timescales and think it will be very challenging to meet key deadlines and achieve a well resolved set of structures.
- They stressed the importance of allowing sufficient time to make modifications to the prototype and stated it would also be beneficial to test how it weathers over a period of time. Issues like dirt traps etc. should be designed out, and the prototype should be tested to ensure it does not have any intensive or on-going maintenance requirements.

5.3 The design of the bus shelters and freestanding adverts has been refined since Place Review Panel, with the key changes as follows:

- The design of the 'pole mounted' signs has been refined.

- Further work has been done on developing the design of the integrated screens to accommodate TfL travel information and the 'real time' bus countdown information.
- Bus stop 'names' have been incorporated (although the refinement of the specifics of this feature is ongoing).
- Work on introducing 'fritting' to the glazed panels (to introduce local distinctiveness), is ongoing.

6. SUMMARY OF MATTERS FOR CONSIDERATION

Principle of Development

- 6.2 As part of new contractual arrangements, this scheme provides an opportunity to upgrade Croydon's public digital infrastructure. Paragraph 112 of the NPPF recognises that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. It requires planning policies and decisions to support the expansion of electronic communications networks and for them to set out how high quality digital infrastructure is expected to be delivered and upgraded.
- 6.3 There are a number of technological benefits of this scheme. As well as digital advertising, that will allow the Council to have specified time for public service advertising such as: public events notices; public awareness campaigns; TfL messages; TfL maps; service disruptions; road works updates; and educational and informational messages (and in emergency situations, display emergency public messages). The replacement bus shelters are proposed to be 'smart' shelters. Essentially this means that they are able to incorporate free public wifi (both within the shelter and in a 50m radius); air quality sensors; noise pollution sensors; footfall sensors; traffic flow sensors; CCTV, 5G small cells; and fast charging USB ports.
- 6.4 The scheme does not result in the loss of bus shelters as they are being replaced in the same (or very similar locations). Advertising is being proposed in the same locations, albeit there is a change from paper based adverts to digital adverts. Officers consider that there would be no material change of use proposed and therefore, the proposed scheme is acceptable in principle, subject to detailed design that responds to the specific characteristics of each individual site.
- 6.5 As set out in paragraph 2.3 above, replacement bus shelters do not require planning permission as they benefit from permitted development rights (as set out in Schedule 2, Part 12, Class A (b) of the Town and Country Planning (General Permitted Development) (England) Order 2015). They could be installed without involvement from the Local Planning Authority. However, as digital adverts are proposed to be incorporated within the bus shelters and the project also involves the replacement of freestanding advertisements with digital adverts, advertisement consent is required. In assessing advertisement consent applications, the only matters that the Local Planning Authority is able to consider are 'amenity' and 'public safety'. 'Amenity' can cover matters such as visual amenity and neighbour amenity and 'public safety' can cover matters such as highway and pedestrian safety, and safety/security matters.

- 6.6 It is noted that whilst the bus shelters themselves (without adverts) could be installed utilising permitted development rights, there are a high number of these structures and they will be visible in the public realm for a significant period of time and will be well utilised by the public. On this basis, the applicant has been working with the Local Planning Authority through the pre-application service, to agree a suitable design.

Design and Townscape

- 6.7 The applicant has been looking at an overarching design for all of the bus shelters and the digital adverts and has adopted a modular approach to allow this overarching design to adapt to specific site conditions.



- 6.8 The proposed shelter would be a simple steel and glazing structure with a cantilevered roof.
- 6.9 The shelter design is characterised by a folding black structural ribbon to bring together a smart technology hub and functional bus shelter elements in to one structure.
- 6.10 The smart technology hub would incorporate 2 digital screens containing travel information and real-time bus arrival information as well as the digital technology identified in paragraph 6.3 above. The remainder of the shelter would be glazed, including the roof. The proposed larger, dual sided, digital advertising screen would be a separate structure from the bus shelter (unlike existing bus shelters, where the large, dual sided advert is part of the bus shelter structure). This allows flexibility for its positioning and options are being considered where the advertising could be either parallel or perpendicular to the bus shelter. The shelter also incorporates seating for passenger use.
- 6.11 Whilst it is recognised that having the digital advertising screen as a separate structure provides flexibility in terms of siting and that in some locations this could be beneficial, there are also concerns with this approach. Depending on the specifics of the siting, there is a high risk of litter/finger trapping, there could be issues with the security of the top surface of the digital screen (potential for concealment of weapons/drugs etc), and as currently proposed, it has a disjointed appearance. Officers are of the view that this element needs further development which would enable it to be fixed into the master structure but could also be detachable.
- 6.12 Several options for the positioning of bus shelters are being considered by the applicant, and this is being influenced by current specific site conditions, most

notably footpath width (although the suitability will be assessed on a site by site basis). This includes the back of the shelter at the back of the footpath, kerbside and in the centre of the footpath.

- 6.13 In some locations (where required), the applicant has proposed a bus shelter option for including a windbreak. The applicant has advised that this is more likely to be proposed in more exposed locations outside of the town centre and other commercial areas, to provide additional protection for passengers. The requirement for such a windbreak will need to be assessed on a site by site basis with an assessment of microclimate conditions to ensure that it is serving its purpose. Going forward, details will be required to demonstrate that the frame and fabrication is durable/robust and shatter resistant and as lightweight in its bulk as possible.



- 6.14 The design of the footpath has evolved and it is more refined and less bulky than earlier iterations. The design development has been positive so far, but it does need to go further and the overarching design now also needs to be discussed in the context of specific locations.
- 6.15 Whilst there has been much discussion on the overarching design, detailed discussions have not yet taken place on the specifics for each location. This is an important step and the applicant has been advised that site-by-site analysis is required in order that the specific proposals and specific siting considerations can be fully assessed and any issues can be resolved at pre-application stage.
- 6.16 The applicant has been developing a design code for the project and when this is finalised, it will need to be submitted to the Local Planning Authority for assessment.
- 6.17 Some discussions have taken place regarding the durability of the proposed design and materials, with a particular focus on the quality of the materials, robustness to vandalism and their maintenance.
- 6.18 TfL have advised that Westminster Black is their preferred colour option for the primary colour of structures. Croydon guidance however advises that 'signal black' is preferred for public realm furniture, therefore it has been recommended

that samples of the TfL Black and the Croydon Black should be provided for comparison.

- 6.19 Samples of proposed materials have been requested, from the applicant. However these have not yet been provided. Any bespoke elements for particular locations, that respond to contextual character needs to be developed and changes in materiality e.g. concrete/terrazzo benches in the town centre vs. timber in a different location etc. needs to be designed well and presented to the Local Planning Authority for consideration. Materials selected must demonstrate robustness, weather tightness, maintainability, cleaning and be of high quality. The finish and fabrication detailing should help reduce vandalism and damage from everyday impact. It should respond well to every day wear and tear in urban environments and protection against the elements. The applicant will need to ensure that the proposals take into account the requirements of Croydon's Public Realm Design Guide.

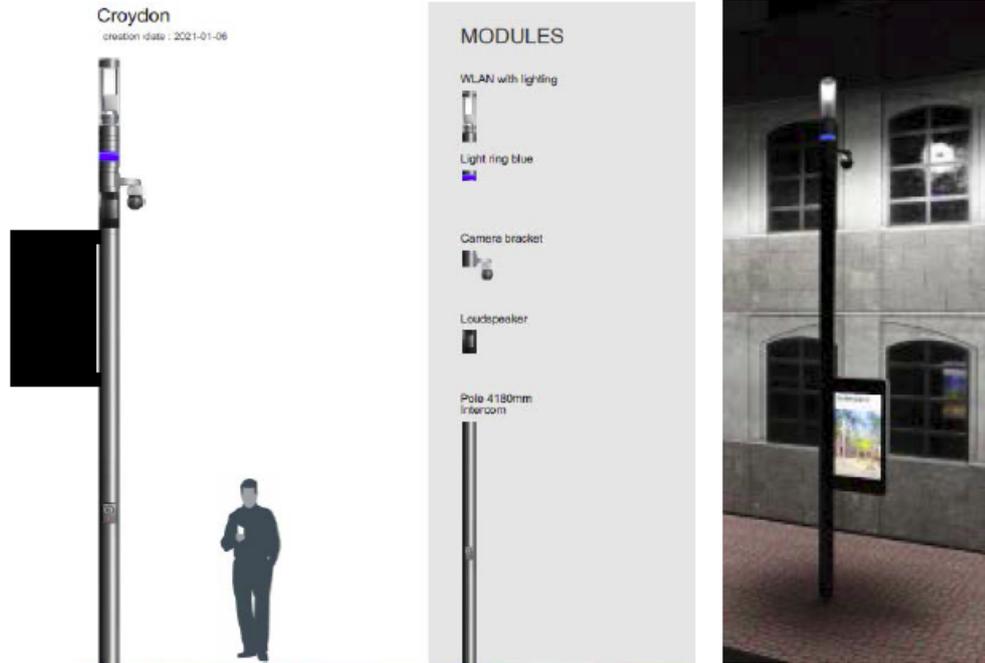
Heritage

- 6.20 21 of the sites are located in Conservation Areas and outside of these areas, there are some locations that are in close proximity to listed buildings. To date, a significant amount of work is still outstanding in terms of assessing the heritage impact of the proposals on a site specific basis. A full assessment of individual sites where there is a heritage impact needs to be undertaken by the applicant, and once the specific proposals for each of these sites are known, further feedback can be provided by Officers. The applicant will need to consider the nature of each of the identified heritage assets and how they might be affected by the proposals, as well as how they inform the design process. There won't be a 'one size fits all' approach. The various resources that can help with this including the Council's own guidance (Borough Character Appraisal, CAGG, CAAMPs etc.) have been provided to the applicant.
- 6.21 A heritage statement will be required for future applications where there is a heritage impact.
- 6.22 The acceptability of such proposals will have to weigh up the public benefits of the proposals against the significance of any heritage impact. On the basis of the limited heritage information to date, the applicant has been advised that large digital screens are unlikely to be found acceptable in some locations within Conservation Areas, unless there are material considerations that suggest otherwise and that digital screens have been resisted in Conservation Areas in the past. It may be that solutions for smaller digital advertising can be found, but this will not be able to be determined until individual site specific assessments have been undertaken.
- 6.23 The place review panel highlighted that whilst Historic England are unlikely to be interested in individual site proposals, they may have an interest in the scheme as a whole. On this basis the applicant has been advised to engage with Historic England at pre-application stage to gauge their interest.
- 6.24 The applicant has suggested that in some locations a frit pattern on glazed areas could be proposed to respond to heritage/site context. This could work in principle. However, Officers will need to see design proposals for specific sites

and samples will need to be provided to allow a full assessment of the suitability of this element of the proposal. Without full details, there are some concerns that this could deter from the principle of maximising transparency/permeability.

Digital Advertisements and Digital Transport Information

- 6.25 The proposed advertising display would be a freestanding 86-inch digital screen. The display is proposed to be double sided and would contain two-dimensional static images in a portrait orientation. The exception to this would be where there is limited pavement width – there are options to have a single sided digital screen parallel to (and forming part of) the back of the shelter, or to have a separate smaller pole mounted digital screen.
- 6.26 The proposed bus shelter also contains smaller format digital screens to display TfL passenger information as well as local area information for passengers. This would be a replacement for the existing ‘paper’ TfL information that is currently found on bus shelters. These two screens would consist of a 32 inch landscape screen containing the bus countdown timer and would be located above head height. This would be above a 55 inch portrait orientated screen containing the local area information and route maps. The arrangement of the screens is proposed to make it look like one large screen.
- 6.27 This is an area that is still under consideration by the applicant and there are some concerns that the orientation of the countdown timer will make it less visible to passengers than the current arrangements. The applicant will need to ensure that the move towards the digital provision of this information does not disadvantage particular groups.
- 6.28 The screen display brightness is fully adjustable and can operate at up to 600 candela/sqm during daylight and the brightness can be reduced in intensity at night. The applicants have advised that the advertisements accord with the Institute of Lighting Professionals best practice guidance; The Brightness of Illuminated Advertisements PLG05 2015.
- 6.29 The Council’s contract with the applicant will enable the council to broadcast a ten second slot during every 60 second cycle for community messaging, public events, public awareness campaigns as well as emergency public messaging in real-time.
- 6.30 In some locations (which are to be determined through individual site assessments, but could include areas where there are heritage sensitivities, a lack of pavement space, safety concerns due to the tram or street clutter), there is the option to not have the large dual sided digital advertising screen, but to have a smaller screen at a higher level that is pole mounted. This arrangement of advertising would also have options for wifi, lighting and CCTV.



6.31 The latest proposal for a smart pole proposal is new. This would be an additional structure in the public realm, whereas earlier discussions were based around the advertising screen being affixed to an existing structure to aid de-cluttering. The applicant has raised the possible complexity in relying on third party infrastructure. The current proposal will add an additional structure into the public realm, which may not be acceptable, depending on specific site circumstances. Each site where this option is proposed will need to be assessed for suitability, taking into account any existing structures which would be removed.

Impact on Adjoining Occupiers Living Conditions

6.32 One of the critical considerations for this site is the potential impact of the development on living conditions of existing and potential neighbouring occupiers, particularly in relation to the visual impact of the introduction of digital advertising displays that have the potential to cause light nuisance.

6.33 It is noted that in many of the existing locations (particularly in commercial areas), the existing poster (paper) adverts are back-lit and the change to digital advertising may not be significant. However, in more residential locations, there may not be the same level of illumination to advertisements. A full assessment will need to be carried out for each individual site of the existing illumination and the impact of the illumination proposed by the digital advertising and details submitted with any future application. The applicants have advised that the intensity of illumination can be controlled and it is likely that a condition will be imposed on future advertisement consents requiring a reduction in the level of illumination in sensitive locations.

6.34 As the bus shelters and digital advertisements are being proposed where these uses are existing, there are no concerns raised regarding the intensity of the proposals.

Highways, Tram and Public Safety

- 6.35 Whilst the proposed bus shelters and freestanding advertisements are being proposed on sites where such structures are already located (and most sites will be acceptable in highway safety/obstruction terms), the applicant has already identified areas where the situation could be improved to comply with current guidelines for the positioning of such structures in the public highway.
- 6.36 The applicant has been advised that an audit needs to be undertaken of each existing site to see if there are existing problems in terms of pedestrian safety and pedestrian comfort. Where any existing issues are highlighted, proposals should respond to this in terms of the proposed siting. Bus shelters must leave sufficient footway. Current guidelines require a minimum of 2 metres where possible, for pedestrians to walk past the shelter and waiting passengers. As this information is still outstanding, Officers have been unable to provide specific advice on this matter to date.
- 6.37 The applicant has been liaising with the Metropolitan Police and TfL to identify potential concerns in relation to the proposed advertising and shelter design.
- 6.38 A key design principle that the applicants have identified, is to ensure the shelters are as transparent as possible, with minimal structural clutter, to avoid blind spots. The large format paper based TfL information is proposed to be replaced with digital screens to further reduce clutter. As highlighted above, further work has been identified in relation to the design and siting of the large advertising screens to make sure that opportunities for weapon concealment are eliminated. The inclusion of CCTV within the shelter offers further security and protection to users.
- 6.39 The material specification has been identified as robust to deal with antisocial behaviour and toughened laminated glass is proposed to be used for all transparent elements. A regular maintenance strategy has also been identified and details of this will be required to be submitted with future applications.
- 6.40 The structural integrity of having large areas of glazing and a glazed roof has been questioned with the applicant – particularly in relation to how it would respond to being struck by a vehicle. The applicant has responded by proposing structural steel for the ‘ribbon’ element and using toughened laminated glass to reduce shattering. The applicant is also currently developing a maintenance strategy for the structures.
- 6.41 The provision of public WIFI has the ability to be able to be shut off remotely to reduce loitering and the risk of anti-social behaviour if this is required in specific locations.
- 6.42 A number of the sites included in this project are in close proximity to the tram network and tram infrastructure. The applicant will need to demonstrate that the positioning of the digital adverts and the transition from one advert to the next will not distract tram drivers. The adverts will also need to be assessed to ensure that sightlines to tram signals are not adversely affected and that adverts are positioned to ensure that pedestrian safety in terms of the tram lines is also not adversely affected. The applicant has been advised that TfL will be a Statutory Consultee on applications for sites adjacent to the tram network.

- 6.43 In addition, the applicant has been engaging with Croydon's Access Officer and looking at TfL guidance on inclusion. The applicant is in the process of producing an equalities impact assessment which covers the physical impact of the bus shelters as well as the signage and digital advertising. Members of the public will be able to receive wayfinding information directly to their phones via free wifi at the bus stands.
- 6.44 The Applicant has also advised that a user testing aspect has been built into the design process. The Applicant will produce a prototype which different groups can feedback on. User testing for various site types will be critical to refining the design of the bus shelters, but there is concern about the short timescales in the Applicant's programme as they will need to ensure issues raised during testing are designed out given the significance of the assets in the public realm across the borough.

Sustainability

- 6.45 The applicant has advised that the design of the shelters and advertising has considered a range of design features including the whole life cycle costs; that they have been designed for disassembly and reuse; that they would be constructed from recyclable materials and a simple palette of self-finished materials where possible; that they include smart technology which could improve pollution monitoring and transport efficiency; and that there is the opportunity to provide photovoltaic cells on the roof of the shelters to supplement power usage.
- 6.46 Whilst this is a good start in terms of considering their sustainability, Officers consider that this could go further.
- 6.47 The option of including green roofs to the bus shelters has been discussed with the applicant. However, utilising current technology, the provision of a green roof would increase the depth of the roof of the bus shelters, giving them a thick and bulky appearance that would be unacceptable. Officers have agreed that this is not a viable option at present. However, the applicant has been advised that the technology for green roofs may change in the future and therefore there may be the opportunity for retrofitting.
- 6.48 The mounting of photovoltaic panels on the roof of the bus shelters is being considered as an option. Whilst it is physically possible to do so, it is understood that viability considerations are key. This is an important part of the proposal to make it more sustainable and to contribute positively to the climate crisis. This is also an important objective which the applicant has been asked to capture in the design principles and code.
- 6.49 The applicant raised some initial concern regarding cost implications of the initial installation of solar panels (in relation to the cost of onsite battery storage vs a contract to transfer energy back to the grid). However, the applicant has been advised that it is important to keep in mind the medium and long term cost benefits and also more importantly, the contribution towards reduced energy consumption and climate change impact. The applicant has provided a list of public benefits that are being provided by the proposals and raised the benefit of including environmental sensors. The real benefit of the project will however

come if it improves environmental quality in some way rather than simply measuring the current condition

7 SPECIFIC FEEDBACK REQUESTED

7.1 In view of the above, it is suggested Members focus on the following issues:

- i. The acceptability of the proposed design of the bus shelters and freestanding adverts.
- ii. The siting of the bus shelters and freestanding adverts and opportunities for public realm enhancement.
- iii. The approach to sites in conservation areas and broader heritage issues.
- iv. The impact of digital advertising on the amenity of adjoining occupiers.
- v. The siting of digital advertising screens in conservation areas.
- vi. The bulk and massing of the proposed structures.
- vii. Sustainability including questions over the use of photovoltaic panels and the lack of use of green roofs.
- viii. Architectural expression and materiality of the scheme and how it responds to its local context, and how this may be improved.