



APPEAL STATEMENT OF CASE

Land Adjacent to 53-55 High Street, Ruislip, HA4 7BD

Prepared by: Libre Solutions

On behalf of: BT Group

April 2026



**SITE NAME:****LAND ADJCENT TO 53-55 HIGH STREET, RUISLIP, HA4 7BD**

APPLICATION REFERENCE NOS.	79854/APP/2026/10and 79854/ADV/2026/5
DESCRIPTION OF PROPOSAL:	Installation of 1No. BT Street Hub Unit and associated advertisement panels on either side of the unit
CLIENT NAME:	BT Group
REPORT TYPE:	Full Statement of Case
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1 INTRODUCTION

This appeal is made under Section 78 of the Town and Country Planning Act 1990 (as amended) in relation to the refusal of planning permission (Ref: 79854/APP/2026/10), and under Section 78(1) as applied by regulations made under Section 220 of the Act in relation to the refusal of express advertisement consent (Ref: 79854/ADV/2026/5), both issued by the London Borough of Hillingdon on 16th March 2026.

This full statement of case has been prepared in accordance with Part 2 of the Town and Country Planning (Appeals) (Written Representations Procedure) (England) Regulations 2009 (as amended). The proposal seeks the installation of 1No. BT Street Hub unit on the public footway adjacent to 53-55 High Street, Ruislip, incorporating internally illuminated digital advertising panels on both sides, together with public Wi-Fi connectivity, free telephone calls, touchscreen information services and device charging facilities.

The application site lies within Character Area 2 - The High Street of the Ruislip Village Conservation Area, as defined in the Ruislip Village Conservation Area Appraisal (July 2010) (the "CA Appraisal"). This character area is described in the CA Appraisal as a busy shopping street, which grew following the opening of the Metropolitan Line station. It contains purpose-built commercial parades characterised by early 20th century shops of varied architectural styles. It is materially different in character from the original medieval village core (Character Area 1), which contains the most historically significant buildings in the Conservation Area.

2 REASONS FOR REFUSAL

The decision notice gives the following reason for the refusal of the scheme:

The proposed BT Street Hub, by reason of its scale, illumination, design and prominent siting, would appear as a visually intrusive feature that would detract from the character and appearance of the street scene and would fail to preserve or enhance the Ruislip Village Conservation Area, **resulting in less than substantial harm** to the significance of the designated heritage asset. This harm would not be outweighed by any public benefits. The proposal is therefore contrary to Policies DMHB 1, DMHB 4, DMHB 11, DMHB 12, DMHB 13A and DMHB 21 of the Hillingdon Local Plan: Part Two (2020), Policies BE1 and HE1 of the Hillingdon Local Plan: Part One (2012), Policies D3 and HC1 of the London Plan (2021), and the statutory duty under Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

The Council raises no concern in respect of highway safety, pedestrian movement, or residential amenity. The Highways Officer raised no objection to either application and no public representations were received. The refusal rests entirely on heritage amenity, and the Council has explicitly conceded that the harm is less than substantial. This appeal therefore determines whether the public benefits of the proposal outweigh that harm.

Having regard to the reasons for refusal, the main issues addressed in this appeal are:

Issue 1: Whether the proposed Street Hub, by reason of its scale, illumination, design and siting, would harm the character and appearance of the Ruislip Village Conservation Area and fail to preserve or enhance its significance as a designated heritage asset.

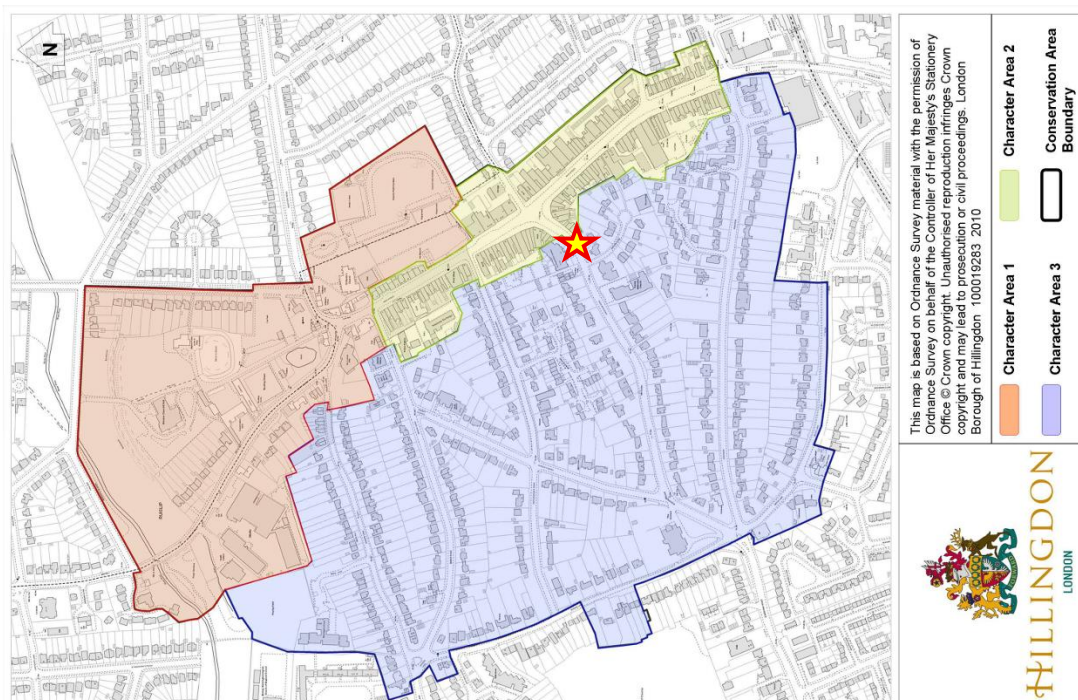
Issue 2: If harm is identified, whether that harm is outweighed by the public benefits of the proposal, having regard to Paragraph 215 of the NPPF (2024) and Policy DMHB 1(A)(ii).

3 JUSTIFICATION FOR APPEAL

The level of heritage harm

The Council accepts that the proposal would cause less than substantial harm to the Ruislip Village Conservation Area. This is an important starting point. The National Planning Policy Framework (2024) is clear that where harm to a heritage asset is less than substantial, it must be weighed against the public benefits of the proposal. This is set out at Paragraph 215. The appeal contends that the Council has not carried out that weighing exercise correctly, because it considered only the advertising panels on the Street Hub when assessing public benefits, and ignored the wider services the unit provides. That is the central issue in this appeal.

The weight given to heritage harm also depends on the sensitivity of the location. Not every part of a conservation area is equally sensitive, and the specific character of the application site is therefore an important consideration.



The site lies within Character Area 2 of the Ruislip Village Conservation Area, which the Council's own Conservation Area Appraisal (July 2010) describes as **'the High Street'**. Paragraph 6.1 of the Appraisal

describes it as a ‘**busy shopping street**’, and paragraph 4.3 records that the southern section of the Conservation Area where the application site sits, contains purpose-built shops arranged in two and three storey commercial parades. This is the commercial part of the Conservation Area, not the historic village core. The historic core which is namely located in Character Area 1 is where the most significant heritage assets are located: St Martin's Church (Grade I listed), the Manor Farm buildings including the 13th century Great Barn, the Scheduled Ancient Monument, and a cluster of 16th and 17th century listed buildings. The application site is a significant distance from all of these. The only listed building in Character Area 2 is the British Legion Hall at No. 32 High Street, well to the north of the site.

The Conservation Area Appraisal is a material consideration in planning decisions, as its own paragraph 1.11 confirms. What it records about the High Street is therefore directly relevant to the weight that the identified harm should carry. Paragraph 4.9 of the Appraisal notes that a number of the shops on the High Street already have **poorly designed shopfronts** and **inappropriate signage**. Paragraph 6.16 records existing clutter from traffic signs and cable cabinets. Paragraph 6.17 confirms that shops and restaurants already use the pavement for advertising boards and café seating and that while this adds clutter to the street scene, it also provides a welcomed level of visual interest and activity. The High Street that the Appraisal describes is a functioning, busy commercial environment with existing signage and street furniture and not the ‘pristine, uncluttered’ setting suggested by the officer's report.

The proposal also replaces an existing BT telephone kiosk rather than introducing a wholly new item of street furniture. The Street Hub is taller than the kiosk and includes illuminated digital advertising panels that the existing kiosk does not have and it is accepted that this difference is the source of the identified harm. However, that difference must be considered in the context of a High Street that the Appraisal confirms already has varied street furniture, advertising boards, cable cabinets and pavement commercial activity as part of its everyday character.

Table 1: List of the Planning permissions that were granted for applications related to Illuminated fascia on High Street of Ruislip.

Reference number	Address	Proposal	Distance from the Appeal site
10729/ADV/202 6/13	72 High Street, Ruislip	Installation of 1no. externally illuminated fascia sign and 1no. externally non-illuminated projecting sign. (Part Retrospective Planning Application)	36 feet (opposite to Appeal site)
57788/ADV/202 5/52	106 High Street. Ruislip, HA4 8LS	Installation of 1 no. internally illuminated fascia sign and 1 no. internally illuminated projecting sign.	382 feet
42185/ADV/202 4/59	144 High Street, Ruislip	Installation of 3no. halo lit illuminated fascia signs. Installation of 1no. non-illuminated directional panel. Relocation of existing double sided yellow internally illuminated "Golden Arch" projecting sign. Existing banner replaced with new.	0.1 mile

The impact of the illumination can also be significantly reduced through planning conditions. The officer's report itself acknowledges that conditions limiting brightness levels, preventing animation, and controlling how frequently images change would be practical and workable in addressing public safety concerns. The same conditions applied to the advertisement consent would substantially reduce any

impact on the character of the Conservation Area. Once those conditions are in place, the residual harm sits at the lower end of the less than substantial range.

The Public Benefits

The officer's report concludes that the advertising panels on the Street Hub do not generate any public benefit capable of outweighing the heritage harm. However, this conclusion rests on a misreading of what the planning balance requires.

Paragraph 215 of the NPPF requires the harm to a heritage asset to be weighed against the public benefits of the proposal - the proposal as a whole, not just one element of it. The Street Hub is a piece of multifunctional public infrastructure. It provides a range of free services to the public, funded through the advertising revenue that the panels generate. The free Wi-Fi, free phone calls, public information screen and device charging that the Street Hub provides are public benefits of the development in their own right. Policy DMHB 1(A)(ii) of the Hillingdon Local Plan Part 2 sets out the same requirement which requires the public benefits of the proposal outweigh the harm. The Council's assessment of public benefits has focused solely on the advertising panels. This approach does not engage with the full range of public benefits that Paragraph 215 of the NPPF and Policy DMHB 1(A)(ii) require to be weighed against the identified harm.

The benefits the Street Hub will deliver to Ruislip High Street are meaningful and wide-ranging. It will provide free Wi-Fi to everyone in the area including residents, workers, shoppers and visitors, including people who may not have reliable internet access at home. It will provide free phone calls to anyone who needs them, including calls to emergency services. National figures for the period November 2024 to November 2025 show that BT Street Hubs across the country handled over 1,900,000 calls to essential charities supporting vulnerable people: 2,010 calls to Childline, 2,896 to the Samaritans, 1,640 to a youth homelessness charity, and 1,558 to Missing People. These are calls that could not have been made without street-level infrastructure of this kind. The Street Hub will also offer free device charging to members of the public, and will remove a redundant telephone kiosk from the footway, contributing to the tidying up of this part of the High Street - an objective the Council has itself identified as a **long-term public realm improvement** priority for Ruislip High Street.

When all of these benefits are weighed against the limited, lower-end less than substantial harm identified (harm that can be further reduced through conditions), the balance falls clearly in favour of allowing the appeal.

4 LEGISLATION AND NATIONAL AND LOCAL PLANNING POLICY

The following section assesses the proposal against each policy cited in the decision notices, grouped by theme.

Visual amenity and the character of the conservation area

Under Regulation 3 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 is Paragraph 141 of the NPPF (2024), which confirms that advertisements should only be restricted where they would result in demonstrable harm to the character or appearance of an area. The Council has conceded that the harm is less than substantial. It is submitted that less than substantial harm, particularly at the lower end of that range and capable of further mitigation by condition, does not constitute the demonstrable harm required to justify outright refusal.

The character of the application site's immediate context is a material consideration in calibrating the weight of that harm. The CA Appraisal identifies three distinct Character Areas within the Ruislip Village Conservation Area. The application site lies within Character Area 2 - The High Street, described at paragraph 6.1 as a busy shopping street, and at paragraph 4.3 as containing purpose-built units in two and three storey shopping parades with varied commercial uses. This is materially different from Character Area 1 - the original village core which contains the Grade I listed St Martin's Church, the Manor Farm complex, the Scheduled Ancient Monument, and the cluster of 16th and 17th century listed buildings at the northern end of the High Street. The only statutorily listed building within Character Area 2 is the British Legion Hall at No. 32 High Street, well to the north of the application site. This distinction is directly relevant to Policies DMHB 4, HE1, and HC1 of the London Plan, all of which require development to preserve or enhance the character or appearance of the Conservation Area. The character that must be preserved is the character of Character Area 2 as the CA Appraisal describes it - a busy, densely developed commercial shopping parade.

The CA Appraisal's own characterisation of the High Street further undermines the officer's description of this part of the Conservation Area as an environment defined by traditional shopfront signage and limited illumination. Paragraph 4.9 records that a number of the shops already have poorly designed modern shopfronts and inappropriate signage that detract from the appearance of buildings and their wider setting. Paragraph 6.16 acknowledges existing clutter from traffic signage and cable cabinets. Paragraph 6.17 confirms that shops and restaurants already use the pavement for advertising boards and cafe seating, and that whilst these add clutter to the street scene, they also provide a welcome level of visual interest and activity. These are concessions in the Council's own adopted document. They directly contradict the officer's characterisation of the High Street as a pristine environment into which the Street Hub would represent a harmful departure.

Policies BE1 and DMHB 11 require development to be appropriate to the identity and context of the townscape and to harmonise with local context. The CA Appraisal (para. 6.6) confirms that the High Street has relatively broad road and wide pavements that lend a spacious feel at street level. Against this backdrop, the Street Hub at 2.99 metres in height, 1.24 metres in width, and only 0.35 metres in depth is a compact and proportionate structure. Policy DMHB 12 requires development to be well integrated with the surrounding area. The Street Hub, sited at an established telecommunications infrastructure location on a wide High Street pavement accommodating varied street furniture, advertising boards and commercial activity, is well integrated with the character of Character Area 2 as described in the CA Appraisal.

The heritage balance

London Plan Policy HC1, Policies DMHB 1 and DMHB 4, and Policies HE1 and BE1 each require development affecting a Conservation Area to conserve its significance. There is also a statutory duty under Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special

attention to the desirability of preserving or enhancing the character or appearance of the Conservation Area, to which considerable weight must be given.

However, these policy requirements must be read alongside the framework established by Paragraph 215 of the NPPF (2024), which expressly provides that where a development will lead to less than substantial harm to the significance of a designated heritage asset, that harm should be weighed against the public benefits of the proposal. This framework is also embedded in the development plan: Policy DMHB 1(A)(ii) explicitly provides that development leading to harm to a heritage asset may be supported where it can be demonstrated that it will provide public benefit that would outweigh the harm or loss in accordance with the NPPF.

The Council has confirmed the harm is less than substantial. It falls at the lower end of that category for the reasons set out in Section 4.2 above. The weight to be given to that harm must therefore be commensurately limited and weighed against the full range of public benefits of the proposal as set out in Section 7 of this Appeal.

On Policy HC1 of the London Plan, it is submitted that the proposal does not represent harmful incremental change to the Conservation Area. The Street Hub replaces rather than adds to existing street furniture and does not increase the number of freestanding structures at this location. The CA Appraisal confirms that the commercial High Street character area already accommodates advertising boards, clutter, and varied street furniture. The proposal is consistent with the established character of this part of the Conservation Area.

Policy D3 of the London Plan promotes a design-led approach that optimises the use of land. The Street Hub delivers maximum public benefit from a minimal footprint, incorporating digital advertising, public Wi-Fi, free telephone calls and device charging within a single structure of only 350mm depth. This is an efficient use of public highway space, consistent with Policy D3.

Advertisements and illumination

Policy DMHB 13A sets out the criteria against which advertisements are assessed. The proposal is assessed against each criterion as follows.

Scale, form and materials (criterion i): The Street Hub is a compact, slender structure replacing an existing kiosk. Its scale is consistent with the established pattern of street furniture on this section of the High Street.

Visual amenity and character (criterion ii): Character Area 2 is characterised in the CA Appraisal as a busy commercial shopping parade where pavement advertising already exists and provides a welcome level of visual interest and activity (para. 6.17). The Street Hub is consistent with and not incongruous within this established character.

Historic assets and setting (criterion iii): The harm to the Conservation Area is less than substantial and at the lower end of that range, having regard to the site's location in the commercial Character Area 2 and the existing conditions acknowledged in the CA Appraisal. Any residual conflict under this criterion is outweighed by the public benefits of the development.

Public safety (criterion iv): The Highways Officer raised no objection. The proposal does not cause adverse impacts on public or highway safety.

Visual clutter (criterion v): The Street Hub replaces an existing kiosk and does not increase the number of items of street furniture. The CA Appraisal confirms that the High Street already accommodates traffic signage, cable cabinets and advertising boards. The proposal does not materially add to existing clutter.

Illumination (criterion vi): The displays are internally illuminated. Conditions can control luminance levels to values appropriate to the Conservation Area context, restrict the rate of image change, and prohibit animation and flashing content. The officer's report confirms that such conditions are workable in the context of the public safety assessment. The same conditions serve to address the amenity concern under this criterion. Subject to those conditions, the proposal is capable of compliance with Policy DMHB 13A.

On balance, the proposal is capable of complying with the criteria of Policy DMHB 13A subject to appropriate conditions. Any conflict under criterion (iii) constitutes less than substantial heritage harm that is outweighed by the public benefits of the development.

Digital infrastructure and public realm

London Plan Policy SI6 supports the provision of digital infrastructure to keep London competitive and digitally connected. Chapter 10 of the NPPF requires planning decisions to support high quality digital infrastructure and the expansion of electronic communications networks. There is no Article 4 Direction preventing telecommunications development at this location. The Street Hub delivers public Wi-Fi and free telephone connectivity in a Secondary Shopping Area, directly fulfilling the objectives of both Policy SI6 and NPPF Chapter 10.

Policy DMHB 21 requires telecommunications development to be sited and designed to minimise visual impact and not to adversely impact Conservation Areas. The Street Hub is sited at the location of the existing BT kiosk - the established position for BT telecommunications infrastructure on this section of the High Street. Its slender form, dark grey finish and compact dimensions are specifically designed to minimise visual impact. Insofar as any adverse impact on the Conservation Area is identified, it is less than substantial and is outweighed by the public benefits of the development when the planning balance required by Paragraph 215 of the NPPF is applied.

London Plan Policy D8 requires development to contribute positively to the public realm, ensuring it is safe, accessible, inclusive and well-designed. The CA Appraisal confirms the High Street has wide pavements providing a spacious feel at street level (para. 6.6). The Street Hub contributes positively to the public realm through its freely accessible communications services and replaces a redundant kiosk, rationalising rather than adding to street furniture. Significantly, the CA Appraisal (para. 6.17) acknowledges that pavement advertising and seating provide a welcome level of visual interest and activity. The Street Hub, providing far greater public benefit than advertising boards alone, is at least as compatible with the public realm objectives of Policy D8. The Highways Officer raised no objection.

Highway safety, pedestrian movement and accessibility

London Plan Policies T2 and T4, and the public safety section of the Advertisement Regulations, require development to maintain safe, accessible and inclusive streets without unacceptable transport impacts. The Council's Highways Officer raised no objection to either the full planning application or the advertisement consent application. The CA Appraisal confirms that the High Street has wide pavements (para. 6.6). No neighbouring occupier raised any concern about pedestrian movement or obstruction. There is no highway safety or pedestrian movement conflict with any relevant policy.

London Plan Policy D5 requires development to achieve the highest standards of accessible and inclusive design. The Street Hub is freely accessible to all members of the public without charge or restriction, providing Wi-Fi, free calls and device charging to all. The proposal accords with Policy D5.

Summary of Policy Assessment

The proposal raises no conflict with development plan policies relating to highway safety, pedestrian movement, residential amenity, or design quality. The single point of conflict is the less than substantial harm to the Ruislip Village Conservation Area, engaged by Policies DMHB 1, DMHB 4 and DMHB 13A(iii), Policies HE1 and BE1, and Policy HC1 of the London Plan.

Each of these policies provides for development causing harm to heritage assets where public benefit outweighs that harm in accordance with the NPPF - as expressly stated in Policy DMHB 1(A)(ii). Paragraph 215 of the NPPF requires less than substantial harm to be weighed against the public benefits of the proposal. The public benefits of the Street Hub are substantial and wide-ranging. The proposal, taken as a whole, is therefore consistent with the development plan and national planning policy.

5 RESPONSE TO CONSULTEE AND NEIGHBOUR COMMENTS

The sole internal objection was from the Conservation Officer, who advised that the introduction of internally illuminated digital advertising would harm the character and appearance of the Ruislip Village Conservation Area. The Council's Highways Officer raised no objection.

The Conservation Officer's concerns are acknowledged. However, the CA Appraisal, which is the Council's own adopted document for understanding the significance of the Conservation Area, characterises the application site's part of the High Street very differently from the Conservation Officer's description. The Appraisal identifies it as a commercial shopping parade with existing clutter issues, where pavement activity adds visual interest. This document must be given weight alongside the Conservation Officer's view.

It is further noted that the Conservation Officer's objection focuses on the advertising element of the unit. The benefits of the communications infrastructure - free Wi-Fi, free calls, device charging, emergency services access - were not weighed in the conservation officer's assessment. These are real and demonstrable public benefits serving the community that uses Ruislip High Street daily.

6 PLANNING BALANCE

The planning balance in this case is governed by Paragraph 215 of the NPPF (2024). The Council has conceded that the harm is less than substantial. That harm falls at the lower end of the spectrum, given the site's location in the commercial High Street character area - not the historic village core - and the CA Appraisal's own acknowledgement of existing clutter and commercial activity in this part of the street.

Public benefits of the Proposal

The proposal delivers a range of social, economic, and environmental benefits, consistent with the objectives of the development plan and national planning policy.

- **Free public Wi-Fi:** Available to all users of Ruislip High Street and the Secondary Shopping Area, supporting digital inclusion for residents, workers, visitors and those without home internet access.
- **Free telephone calls:** Including to emergency services and essential charities. National data for November 2024 to November 2025 shows BT Street Hubs facilitated over 1,900,000 calls to essential charities for vulnerable people: 2,010 calls to Childline, 2,896 calls to the Samaritans, 1,640 calls to a youth homelessness charity, and 1,558 calls to Missing People.
- **Touchscreen public information and wayfinding:** Supporting the vitality and accessibility of Ruislip Town Centre and the Secondary Shopping Area.
- **Mobile device charging:** Freely available to all members of the public.
- **Rationalisation of street furniture:** The Street Hub replaces a redundant BT telephone kiosk, consistent with the Council's stated objective to rationalise street furniture and enhance the public realm along Ruislip High Street.
- **Digital connectivity:** Supporting London Plan Policy SI6 and NPPF Chapter 10 objectives for high quality digital infrastructure in a Secondary Shopping Area.
- **Commercially funded infrastructure:** Reducing reliance on public funds for street-level communications provision

Potential Impacts

The sole identified impact is less than substantial harm to the Ruislip Village Conservation Area at the lower end of the spectrum. No highway safety, residential amenity, or pedestrian movement concerns have been raised. No public objections have been received.

The less than substantial harm can be further mitigated by conditions controlling luminance levels, image rotation speed, and prohibiting animation and flashing content. The officer's report confirms such conditions are workable; they equally apply to reduce the amenity impact on the Conservation Area. The residual harm after appropriate conditions are imposed is minimal.

Planning Balance

The officer's report dismisses the public benefits by reference to the advertising element alone. The NPPF and Policy DMHB 1(A)(ii) require all public benefits of the proposal to be weighed. When they are: encompassing free Wi-Fi, free calls serving thousands of vulnerable people nationally, device charging, rationalisation of redundant infrastructure, and support for digital connectivity objectives – those benefits clearly and demonstrably outweigh the limited, lower-end less than substantial harm identified.

The absence of any public objection, despite extensive notification of neighbours and the Ruislip Residents Association, reinforces this conclusion. The community most affected has expressed no concern.

7 CONCLUSION

The Council has conceded that the harm to the Ruislip Village Conservation Area is less than substantial. When that harm is weighed against the specific character of the application site - which the Council's own Ruislip Village Conservation Area Appraisal (July 2010) identifies as a busy, commercially active High Street in Character Area 2, with existing clutter from traffic signage, cable cabinets, advertising boards and poor shopfront signage - it is clear that the harm falls at the lower end of the less than substantial spectrum.

The Council has then failed to apply the planning balance that Paragraph 215 of the NPPF and Policy DMHB 1(A)(ii) require. It has assessed only the advertising element of the proposal and concluded that element generates no public benefit, whilst ignoring the substantial public benefits of the communications infrastructure that the Street Hub provides: free Wi-Fi, free telephone calls to emergency services and essential charities serving thousands of vulnerable people, device charging, and the rationalisation of redundant street furniture.

When the balance required by Paragraph 215 is properly applied, weighing all the public benefits of the proposal against the limited, lower-end less than substantial harm – the outcome is clear. The public benefits substantially outweigh the harm. The absence of any public objection, despite extensive consultation with neighbours and the Ruislip Residents Association, reinforces that conclusion.

The proposal represents sustainable development consistent with the development plan and national planning policy. It should be permitted on appeal.

Accordingly, in the overall planning balance, the public benefits clearly outweigh the limited heritage harm identified. The proposal represents sustainable development and should be permitted on appeal.