Our Ref: HILL012B

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Planning and Transportation Group.
Civic Centre,
High Street,
Uxbridge,
Middlesex,
UB8 1UW

10/05/2022

Dear Planning,

BT STREET HUB PROJECT
FULL PLANNING AND ADVERTISING APPLICATION
HILL012B – Pavement o/s Poundland, 157-158 High Street, Uxbridge, UB8 1JY

We write on behalf of our client, BT, following our pre- application consultation relating to various sites, including the entitled, across your authority for the installation of BT Street Hubs and the associated removal of BT payphones. Taking onboard the comments received BT are moving forward with particular case and are applying to Hillingdon Borough Council for full planning permission and advertisement consent for installation of 1no. BT Street Hub and removal of 2no. associated BT payphone.

To recap, the InLink UK service was first launched in 2017 and since then 494 InLink structures were rolled out in 23 cities. These units offer 1Gbps free public Wi-Fi, free UK calls, USB charging, an emergency services button and a range of other digital services for those in the vicinity. HD displays on the sides are used to carry advertising, which helped to fund the units, but the screens can also show local content free of charge. The suppliers of the InLinks unfortunately went into administration in 2019 and are no longer able to supply units to BT, hence this product is no longer available. Since then, BT have been working on a new and improved unit, the BT Street Hub, that they are keen to rollout in Uxbridge.

BT Street Hub Project

BT is continuing to move forward with public connectivity and benefits in which Street Hubs will provide a sleek and modern answer to the demands of a digitally connected society. BT Street Hubs have all the existing features of the previous InLink unit, but has better Wi-Fi range, environmental sensors, insight counting and small cell mobile connectivity. The addition of the 5G small cells to Street Hubs is very much in line with current UK Government's guidance on communications infrastructure and the National Infrastructure Strategy. This is echoed in the Government's commitment towards telecommunications deployment which has been strengthened since the conception of InLinks and NPPF 2021, para 114 in particular confirms that, 'Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G)".

Since the rollout of InLinks, there has been increased focus on green initiatives and environmental monitoring. Street Hubs take this into account and have sensors that can count

pedestrian, cyclist and vehicle movements as well as monitor air, sound and light. This free information has its own dashboard and will help the planning system actively manage patterns of growth in support of national air quality objectives and the Governments ten-point plan for a Green Industrial Revolution. It will be a useful source of real-time data in the delivery of the Council's own green agenda, travel plans and can be used to present a business case for carbon offset credit.

Overall, Street Hubs will help future proof the high street making them smarter, safer, and more sustainable. Investment in the high street is at an all-time low, but that has not slowed BT down as they look to ramp up their rollout of new Street Hubs across the UK. They are continuing their commitment to invest and improve in the high street, with one Street Hub at a time, and with that decluttering these environments with the associated removal of existing BT phone boxes.

This submission comprises of the following documents:

- Site specific Planning and Design and Access statement;
- 1App forms and certificates generated by the Planning Portal;
- The prescribed fee of £924 paid directly to the Council via the Planning Portal;
- Drawings including location plan map, proposed site plan, existing and proposed elevations;
- BT Street Hub Product Statement giving full details of the proposed structure;
- BT Anti-Social Behaviour Management Plan;
- 'The Institute of Lighting Professional's 'Professional Lighting Guide 05: The Brightness of Illuminated Advertisements' 2015 for your reference;
- International Commission on Non-Ionizing Radiation Protection (ICNIRP) certificate.

Where possible, we have specifically drawn the red line around the proposed BT Street Hub and the associated BT phone box found immediately adjacent to try and encompass the removal as well.

The application site and proposal is found on adopted highways controlled land that is maintained at the publics expense, in which as BT are a statutory undertaker on such land, a developer's notice has been served on the Highways Authority and any others who have been identified from Land Registry records as being an owner of the land.

We trust the applications can be registered at your earliest opportunity, in which should you require any further information or have any queries please do not hesitate to email me.

Yours sincerely

J.Lee

Josh lee
Solutions30 UK

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Planning, Design and Access Statement

Our Ref.	**HILL012B**
Lat/Long	**51.5464569217844, -0.479744046770179**
Project Type	**BT Street Hub**
Conservation Area	**Old Uxbridge /Windsor Street**
Statutory Listed Buildings in vicinity	**n/a**

As part of our collaborative approach to connecting and improving local streets, Full Planning Permission and Express Advertisement Consent is sought for the installation of 1no. BT Street Hub and removal of 1no. associated BT payphone / 2no. associated BT payphones.

Proposed Install
Pavement o/s Poundland, 157-158 High Street, Uxbridge, UB8 1JY

Proposed Removal 1 **01895274376** **Pavement o/s Poundland, 157-158 High Street, Uxbridge, UB8 1JY**	Proposed Removal 2 **01895810832** **Pavement o/s Poundland, 157-158 High Street, Uxbridge, UB8 1JY**
	

Planning Legislation

This application is for full planning permission under section 62 of the Town and Country Planning Act 1990 [the 1990 Act] and express advertisement consent under regulation 9 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 [the Regulations]. Applications for full planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise (Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the 1990 Act). Under the advertisement Regulations, Express Consent is required for the advertisement element, notably the 2no digital screens on each side of the Street Hub. As per regulation 3 of the Regulations, applications for Express Advertisement Consent must be determined in the interests of amenity and public safety, considering (a) the provisions of the development plan, so far as they are material, and (b) any other relevant factors.

UK Digital Strategy

Digital connectivity is now considered to be a utility, and modern life is increasingly impossible without it. Connectivity drives productivity and innovation and is the physical underpinning of a digital nation. Being connected is fundamental to the success in our modern world and Street Hub provides a cost-free way for communities to get online and take advantage of available opportunities. The Government has committed that every individual and every business should have the skills and confidence to seize the opportunities of digital technology and have easy access to high-quality internet wherever they live, work, travel or learn. An update to the UK's Digital Strategy has unfortunately been postponed due to the Covid-19 pandemic but is now due to be published in 2021 and drafts indicate continues to promote the government's policy of improved digital connectivity.

National Infrastructure Strategy

Published in November 2020, the Government acknowledges in its National Infrastructure Strategy that investment in our infrastructure is critical as the UK seeks to recover from the Covid-19 pandemic. The Strategy puts innovation and new technology at its heart, in which BT Street Hub is at the forefront of this technological revolution. The Government's ambition

is to support fast and reliable digital connectivity that can deliver economic, social and well-being benefits because new technologies have enormous potential to improve the environment and the daily lives of people across the UK. BT Street Hub can contribute to this with its suite of features, including Wi-Fi and small 5G cells capabilities, air monitoring and much more.

National Planning Policy Framework, 2021

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied and is a material consideration for both the Full Planning applications and the Express Advertisement Consent applications.
The NPPF supports the provision and promotion of sustainable transport at section 9. These relevant policies are set out below:

Paragraph 111 - Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Paragraph 112 - Within this context, applications for development should: [...] c) create places that are safe, secure and attractive, which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards.

The NPPF supports the provision of high-quality communications infrastructure at section 10. These relevant policies are set out below:

Paragraph 114 - Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. Policies should set out how high-quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).

Paragraph 115 - The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings, and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate.

Paragraph 117 - Applications for electronic communications development (including applications for prior approval under the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development.

Paragraph 118 - Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.

The NPPF states the following specifically in relation to advertisement control in section 12:

Paragraph 136 - The quality and character of places can suffer when advertisements are poorly sited and designed. A separate consent process within the planning system controls the display of advertisements, which should be operated in a way which is simple, efficient and effective.

Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.

Hillingdon Local Plan – "A Vision for 2026"

The Hillingdon Local Plan: Part 1- Strategic Policies is the key strategic planning document for Hillingdon and supports the delivery of the spatial elements of the Sustainable Community Strategy. It sets out the long-term vision and objectives for the Borough, what is going to happen, where, and how this will be achieved.

We believe the proposal helps the Local Authority towards its strategic objectives outline in the "A Vision for 2026" local plan. Most notably:

SO16: Manage appropriate growth, viability and regeneration of town and neighbourhood centres.

- By replacing aging and damaged BT Phone Boxes with the latest BT Streethub, including Free Wi-Fi and cellular connectivity, this proposal contributes to the renewal and regeneration of a key high street in the local authority.

SO1: Conserve and enhance the borough's heritage and their settings by ensuring new development, including changes to the public realm, are of high-quality design, appropriate to the significance of the heritage asset, and seek to maintain and enhance the contribution of built, landscaped and buried heritage to London's environmental quality, cultural identity and economy as part of managing London's ability to accommodate change and regeneration.

- The BT Streethub proposed is a modern minimalistic design meant to easily blend into local surroundings. Its high-quality design is fit for the future on the modern high street.

SO6: Promote social inclusion through equality of opportunity and equality of access to social, educational, health, employment, recreational, green space, and cultural facilities for all in the borough, particularly for residents living in areas of identified need.

- The BT Streethubs free Wi-Fi and cellular connectivity increase opportunity and equality of access helping to bridge the digital divide whilst providing legacy telephone access. The proposal creates a Free Wi-Fi hotspot increasing local connectivity and tourist amenity.

Pre-application advice

Solutions30 UK (previously Mono Consultants) applied for pre-application of sites to gain considering responses from the local authority.

James Wells replied to our request on 7th March 2022 (ref: 76698/PRC/2021/200). The feedback was concerned that the relocation position would have an adverse impact on service vehicle movement and pedestrian amenity in this pedestrianised section of the High Street.

Due to the considered feedback, we have decided to process with this new HILL012B proposal which, instead of relocating the existing kiosks, would directly replace them. We believe this proposal would cause minimal disruption to the existing high street and would have a lower footprint to than the existing kiosks.

Planning History

It is noted that an application for the previous generation InLink device was made in 2018/19. The application for the removal of the existing kiosks and erection of the Inlink structures was approved however the application for the advertisement screens was denied however an appeal decision on the 9th June 2020 (APP/R5510/Z/19/3225667) was allowed granting permission for the digital LED screens with a 5 year consent.

It is noted that in the vicinity of the application site there is advertisement presence and telecommunication infrastructure, in which there are many transferable points that can be had with this Street Hub proposal.

LPA Ref – 74355/ADV/2018/77- Display of an internally illuminated digital LED screen to both side of the proposed free standing InLink
Site Address - Fronting 157-158 High Street, Uxbridge UB8 1JY
Decision – Refusal (P) (Appealed, Granted)

LPA Ref – 74355/APP/2018/4128 - Removal of two existing BT payphone and the installation of one freestanding InLink structure
Site Address - FRONTING 157-158 HIGH STREET UXBRIDGE UB8 1JY
Decision - Granted

Direct replacement

In this instance the proposed Street Hub is a direct replacement in the position of the existing associated BT phone boxes to be removed. This was done after feedback from the pre-planning advice to ensure the continuation of pedestrian amenity and access for support vehicles.

Siting Justification against Planning Policy

At the conception stage, we have tried to focus on pursuing direct conversions of existing kiosks wherever practicable. Also, we have looked for locations with wide pavements, and where a sites relationship with existing street furniture avoids undue proliferation of clutter. It should be recognised that BT's legacy estate of payphones has grown up organically over the years, in which the whereabouts of BT kiosks can sometimes sit in environments that have changed dramatically around them. In some instances, the BT Street Hub project has been seen as an opportunity to improve the pedestrian environments by removing awkward BT kiosks and repositioning the new unit to a more in keeping spot in the street scene.

It is appreciated that streets are ever-evolving environments, amidst society's changing connectivity demands. BT has a universal service obligation with Ofcom to provide a street level phone service, so the selection process of kiosks to be removed had to cater for this, however there is a recognition that the use of phone boxes has dramatically changed since kiosks were first conceived, whilst now the need for WI-FI and mobile coverage has increased massively. In this respect we have tried to build a sequence of Street Hub sites wherever possible, so that this can improve the user connectivity experience as they travel through an area.

Likewise, as Street Hubs can provide the Council with valuable data as each unit has environmental sensors that can monitor air, sound, and light, we have tried to plan a sequence of Street Hub sites along key routes, so that the information gathered can be better analysed. This free environmental data has its own dashboard and will help the planning system actively manage patterns of growth in support of national air quality objectives and will be a useful source of real-time data in the delivery of the Council's own green agenda. In a similar vein Street Hubs have the capability to monitor pedestrian, cyclist, and vehicle movements, hence in building a strategic network of Street Hub units it will help the Council to monitor and develop travel plans for the area.

The introduction of any form of development within a particular environment will always be, to some degree, a noticeable addition or change to those residents, businesses and regular passers-by found closest. However, it should be appreciated that the visibility of something that is new or the change in form of something that has an established presence on-site, like a telephone kiosk to a Street Hub unit, does not automatically result in an overwhelming adverse harm occurring. The starting point and fundamental principle applied by the applicant is always to replace existing BT call boxes with Street Hub units where they will be in-keeping with their existing surroundings. In this regard it is seen as an opportunity to help future proof the high street making them smarter, safer, and more sustainable.

In progressing new Street Hub sites, so far as practicable we have sought to minimise the contrast between the development itself and its immediate environment through appropriate siting and design. The siting of each Street Hub has been considered having regard to the available footpath widths, the whereabouts of the existing payphones to be removed and the visual character of that particular street scene where the new Street Hub. With regards its associated advertisement screens, thought has been given to its immediate context and public safety in terms of pedestrian and vehicular movements. These criteria have been adjusted where necessary on a site-by-site basis to account for local context and policy requirements when reassessing the site's suitability to accommodate a new Street Hub unit.

Justification for the siting and appearance of the proposed Street Hub, has been assessed against up to date national and local planning policies and any other material considerations. Our assessment has concentrated on whether the removal of the existing BT call boxes when balanced against the replacement of new Street Hub at the application site, creates a significant visual harm as to outweigh the public benefits.

In this regard matters of siting, appearance and advertisements are discussed as follows: -

Siting
This proposal involves the removal of 2no. BT existing call boxes in association with 1no proposed new Street Hub. Also, as previously highlighted at a strategic level there are generally 2no BT call boxes removed with every Street Hub proposed. The removal of these existing call boxes will declutter street scenes throughout the authority and when comparing the footprint of existing call boxes to be removed and proposed Street Hub, it will declutter more pavement and so free up space.

This proposal has been proposed as a direct replacement of existing BT Kiosks on Uxbridge High Street. The High Street is an important commercial street in Hillingdon, with a mix of large national chains and small retail outlets down the entirety of its length. It is felt that the proposal would foster an improvement to pedestrian amenity in this location. The proposed Street Hub would be away from the main walkway and adjacent to the existing street furniture so it felt that this position would not foster any unduly effects on pedestrian amenity in this location.

The siting of the proposed BT Street Hub will not appear incongruous within this part of Hillingdon given the modern frontages and street furniture found along this stretch of road.

It is concluded that the siting of the proposed Street Hub is acceptable and is in accordance with the applicable national and local planning policies.

Appearance
The proposed BT Street Hub unit is an advanced, modern development which has been designed following significant improvements in technology and digital content over recent years. It can promote the image of the authority as a vibrant place, and we believe it will improve the quality of the immediate streetscape for residents, businesses and visitors.

The proposed design is slimmer and takes a more compact profile than the existing BT payphone boxes that the proposed Street Hub is replacing. The user interface is located at a

low level and is a similar height to an existing BT payphone unit to ensure that it is accessible to all users.

The appearance of the BT Street Hub unit has a vertical emphasis and by reason of its reduced footprint would give a slender more elegant form of development when compared to an existing payphone unit. The appearance of the structure is not considered to be harmful to the wider street scene, especially when considering the nature of the existing payphones to be removed. We believe the appearance of the area and street scene will not be compromised by the proposed new BT Street Hub.

The new structure will be set within a generally commercial setting and busy stretch of road that is dominated by vehicular and pedestrian movements; hence it is well-lit throughout the day. While it is accepted that the BT Street Hub advertisements will be more visible during the hours of darkness or in dull conditions, its appearance would not be out of keeping with this stretch of road which is well lit by streetlights, window displays, other advertisements and bus shelters containing advertisement panels. In this context, the BT Street Hub design would not appear detrimental to the amenity of Uxbridge High Street, the setting of the Conservation Area or any nearby Listed Building.

It is concluded that the design of the proposed Street Hub is justified, and its appearance is an improvement when compared to the BT call boxes that are to be removed in association. Therefore, it is considered that the appearance of the proposed Street Hub is acceptable and is in accordance with national and local planning policies.

Pavement Width
The total existing pavement width at this location is 17000mm. Due to the location of the site and the orientation of the Streethub the remaining footway of 15800mm is clear for the safe passing of pedestrians. It is of note that the structure is only 350mm wide, so any minor narrowing of the footway occurs for just a few centimetres.

Advertisements
When seen in the overarching context of the street scene, it is considered that the location, size, and height of the digital advertisement panels will on balance be acceptable. As previously discussed, it is believed that the siting and appearance of the BT Street Hub would not create significant harm to the amenity of the area that would outweigh the public benefits and other material factors of consideration.

In terms of public safety, the site of the BT Street Hub and the display of digital advertisements on its sides will allow for the continued safe movements of motorists and pedestrians. In this regard, its presence within the street scene would not endanger public safety of those people who are taking reasonable care for their own and others' safety.

It is recognised that all advertisements are intended to attract people's attention, however in this case their siting and size would not create an untoward feature within the street scene. The position where the BT Street Hub is to be located and the orientation of the advertisements in relation to the road would not cause unacceptable interference with nearby road signs and or navigational lights. Viewed within the street scene setting, the digital advertisements would be seen by passing motorists but would not create confusion nor influence the behaviour of drivers to such a degree that they would cause a hazard by reason of their presence. The proposed Street Hub would be sited away from road junctions so it would not unduly interrupt any visibility splays or sightlines. When viewed within the street scene context of the wider environment, it is not considered that the Street Hub would appear as an untoward feature to passing motorists.

With regards pedestrian safety, the Street Hub is positioned away from the road edge on a wide section of pavement without impeding pedestrian movements as ample footway width would be retained. Allowing for the orientation of the BT Street Hub's user interface in relation

to passing motorists, the public safety of those using it would not be put at risk as they would be set off the kerb edge.

The proposed usage for the screens has been set in accordance with Transport for London's (TfL) policy document 'Guidance for Digital Roadside Advertising and Proposed Best Practice – 2013' [the TfL Guidance].

In addition to the above conditions, each Street Hub location has been assessed against and would comply with the following additional criteria from the TfL Guidance.

- There would be no conflict with any traffic signs, signals, crossing points, schools, hospitals or low bridges.
- No sightlines or clearances would be affected.
- The TfL guidance states that 'Static digital advertising is likely to be acceptable in locations where static advertising exists or would be accepted.' There are existing traditional advertisement on similar sections of the respective roads in many cases.
- The geometry of the roads are not complicated and the driving conditions are not considered to be demanding or complicated.
- The advertisements would not be experienced by a driver in conjunction with any other similar digital advertisements.
- As per the TfL guidance, the advertisements would be located as close to the driver's natural eye line as possible and facing as head-on to the traffic as is practical.

The lighting levels noted above are within the levels set for this type and size of screen (those under 10m2) as set by the Institute of Lighting Professionals, Professional Lighting Guide 05: The Brightness of Illuminated Advertisements (2015). A copy of this document is appended for clarity.

Planning Conditions
To give assurance that each Street Hub will operate as intended and the associated payphone removals will occur, we would be pleased to accept the following conditions or a mutually agreed version of them to be included as part of any planning consent:

A. Within three (3) months of development commencing the existing BT payphones shown above shall be removed in their entirety and the land made good to the same condition as the adjacent land.
B. Pavement surrounding the Street Hub shall be made good to the same condition as the adjacent land.
C. The intensity of the illumination of the two digital display screens shall not exceed 600 candelas per square metre (cd/m2) between dusk and dawn in line with the maximum permitted recommended luminance as set out by 'The Institute of Lighting Professional's 'Professional Lighting Guide 05: The Brightness of Illuminated Advertisements'.
D. The digital display screens shall not display any moving, or apparently moving, images (including animation, flashing, scrolling three dimensional, intermittent, or video elements).
E. The minimum display time for each piece of content on the digital display screens shall be 10 seconds.
F. The interval between each piece of content on the digital display screens shall take place over a period no greater than one second; the complete screen shall change with no visual effects (including swiping or other animated transition methods) between displays and the display will include a mechanism to freeze the image in the event of a malfunction.
G. No content on the digital display screens shall resemble traffic signs, as defined in section 64 of the Road Traffic Regulation Act 1984.

Should your Council wish to append any other conditions to either the full planning or advertisement application, we would be most grateful if you could discuss these with us at your earliest opportunity during the determination process.

Conclusion

BT Street Hubs have the potential to significantly enhance the provision of local community communications facilities and services. It is precisely the type of high-speed digital infrastructure that the government is seeking to support as part of the presumption in favour of sustainable development. It will deliver social, economic, and environmental benefits by providing a suite of essential urban tools/services, including free ultrafast Wi-Fi to residents, businesses, and visitors in this area. Overall BT Street Hubs will help future proof the high street making them smarter, safer, and more sustainable.

The proposed BT Street Hubs structures are of a high quality, accessible design that would be a significant improvement when compared to the existing payphones that are to be replaced. We consider the proposal in this case to be appropriately sited; to reduce street clutter, to improve available footway widths, not to negatively affect heritage assets nor adversely affect amenity or public safety.

We believe this statement has demonstrated that the BT Street Hub proposal is in accordance with national policy set out in the NPPF and local development plan policies, in which we would hope that this application can be supported by your Council.