Planning, Design and Access Statement

Our Ref.	**HiL-14**
Address	**High Street, outside No. 124, Ruislip**
Postcode	**HA4 8LS**
NGR:	**NGR: E509326, N187264**
Project Type	**BT Street Hub 3**
Conservation Area	**Ruislip Village Conservation Area**
TFL Red Route	**N/A**

As part of BT's collaborative approach to connecting and improving local streets, Full Planning Permission and Express Advertisement Consent is sought for the removal of an existing ST6 telephone unit and the installation of a replacement BT Street Hub 3, at the above location.

BT are now continuing with their street improvement programme, which will again see the removal of old, under-used, legacy telephone kiosks from the streets, and the deployment of replacement Street Hub 3 Units which offer significant, **free**, public benefits and connectivity.

The proposed Unit, the BT Street Hub 3, is the most modern unit available and BT are keen to deploy these within your Local Authority area.

Existing Streetscene High Street, outside No. 124, Ruislip, HA4 8LS	**Proposed BT Street Hub 3** High Street, outside No. 124, Ruislip, HA4 8LS
	

Figure 1: Existing and Proposed Streetscene (Source: Applicant's Site Survey Photographs)

The BT Street Hub 3 is the next generation Unit, with improved features and capabilities including environmental sensors, insight counting and small cell mobile connectivity. The addition of the 5G capability into the Street Hub 3 is very much in-line with current UK Government 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. The NPPF, in paragraph 119, 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. The BT Street Hub 3 has been designed to accommodate sensors such as air quality monitoring. This free information will help the planning system actively manage patterns of growth in support of national air quality objectives and the Government's ten-point plan for a Green Industrial Revolution. It can be a useful source of data in the delivery of the Local Authority's own green agenda.

Overall, BT Street Hubs will help future-proof the high street making them smarter, safer, and more sustainable, while also providing a valuable contribution to the Government's aim to improve wireless communications across the UK.

Using the timeline feature on Google Streetview, it can be established that the application site has evolved over the last two decades. In July 2008, the site was occupied by two legacy kiosks, as shown in Figure 2, below.



Figure 2: Legacy kiosks in situ, July 2008 (Source: Google Streetview)

At some point between July 2008 and August 2012, the two legacy kiosks were replaced by the existing ST6 unit, which remains in situ today.



Figure 3: Existing ST6 unit in situ, September 2014 (Source: Google Streetview)

As per Figures 2 and 3, above, a ‘unit’ has been present at the application site for **at least 18 years**. As such, the ‘*principle*’ of a unit at this location is well established. It is anticipated that these legacy kiosks were deployed for a lot longer than Google Streetview suggests, given the fact that BT’s payphone estate has been deployed in the UK for several decades. The proposed upgrading of this unit, therefore, is simply considered the next stage in the technological evolution of BT’s street furniture estate at this location.

It should be acknowledged that the width of the existing ST6 unit is greater than the width of the proposed Street Hub 3 Unit which will replace it. As such, more pedestrian footway will be returned to public use. Further to this, the advertising screen on the existing ST6 unit is greater than those proposed as part of the replacement unit. Given both of these factors, it is submitted that the proposed upgrading of this existing street furniture is wholly acceptable when compared to what is currently in situ, and what has been installed at this location previously. . As the proposal is a 1-for-1 swap, there will be no net increase of street furniture.

The surrounding streetscene along High Street is typically commercial, with three-storey terraced properties creating a continuous shopping promenade fronted by parking bays. The majority of ground-floor properties are host commercial and retail units, which display colourful shop frontages and both illuminated and non-illuminated advertising. The upper levels of these properties consist of residential properties. There is a plethora of street furniture along this stretch of highway, all positioned in a linear form to ensure that pedestrian flow and desire lines are not impacted.

A New World Payphone kiosk, with an integrated advertising screen larger than those proposed within the Street Hub 3 Unit, sits on the same stretch of footway as the application site. The presence of this kiosk, plus the presence of the existing ST6 unit at the application site, is a clear demonstration that the streetscene can absorb such units.



Figure 4: Relationship between existing ST6 unit and other similar units within the local streetscene (Source: Google Streetview)

All views of the existing ST6 unit are framed against the backdrop of the commercial shopping parade along High Street. It is submitted that all views of the replacement Street Hub 3 Unit will also be framed against these buildings, which will thereby reduce any visual impact, or prominence, of the proposed Unit within the streetscene.

It should be acknowledged that High Street is a busy bus route and accommodates a number of TfL bus shelters. These bus shelters host integrated advertising screens which are larger than those proposed as part of this upgrade. As such, High Street already accommodates a significant level of advertising, which is expected in such a busy and vibrant area.

In 2017, BT launched its InLink UK service, which centred on the removal of traditional telephone kiosks from the public highway, and the deployment of replacement InLink Units in their place. These first-generation 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. LED display screens on each side of the Unit carry advertising, which helps to fund the Units themselves, and its free services.

The InLink UK programme led to the removal of over one thousand traditional telephone kiosks from public highways across the UK, and the deployment of approximately 500 InLink Units in 23 cities and all London Boroughs.

The Street Hub 3 Unit is the most modern unit available, with improved features and capabilities including environmental sensors, insight counting and small cell mobile connectivity. The Local Authority currently hosts x5 Street Hub units within its jurisdiction. Planning permission has been granted for another x5 Units, which are yet to be deployed.

The replacement of the existing telephone kiosks, within the streetscene, with more modern Street Hub 3 Units is simply the next stage of technological evolution of BT's street furniture estate within the Local Authority area.

In total, BT's InLink and Street Hub estate now comprises of more than 1000 Units, across the whole of the UK, which provide free public wi-fi and allow free telephone calls.

The application site sits within Ruislip Village Conservation Area.

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 BT Street Hub 3.

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 forward-thinking streets and the proposed BT 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.

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.

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

The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 state the following specifically in relation to advertisement control:

PART I - General

Powers to be exercised in the interests of amenity and public safety

3. (1) A local planning authority shall exercise its powers under these Regulations in the interests of amenity and public safety, taking into account;

(a) the provisions of the development plan, so far as they are material; and (b) any other relevant factors.

(2) Without prejudice to the generality of paragraph (1)(b);

(a) factors relevant to amenity include the general characteristics of the locality, including the presence of any feature of historic, architectural, cultural or similar interest;

(b) factors relevant to public safety include;

(i) the safety of persons using any highway, railway, waterway, dock, harbour or aerodrome (civil or military);

(ii) whether the display of the advertisement in question is likely to obscure, or hinder the ready interpretation of, any traffic sign, railway signal or aid to navigation by water or air;

(iii) whether the display of the advertisement in question is likely to hinder the operation of any device used for the purpose of security or surveillance or for measuring the speed of any vehicle.

(3) In taking account of factors relevant to amenity, the local planning authority may, if it thinks fit, disregard any advertisement that is being displayed.

(4) Unless it appears to the local planning authority to be required in the interests of amenity or public safety, an express consent for the display of advertisements shall not contain any limitation or restriction relating to the subject matter, content or design of what is to be displayed.

National Planning Guidance:

National Planning Policy Framework, August 2026

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 and Advertisement Consent applications.

It is not necessary to quote extensively from this document but the following points are highlighted.

In the context of transport related matters as set out in Chapter 15 Promoting sustainable transport of the NPPF, the following paragraphs are applicable to this application:

> *'1 – To contribute to creating well-designed places, transport considerations should be integral to the design of development.'*

> *'1(C) – Ensure the arrangement of streets and other routes help to create places that are safe, inclusive and attractive for all users (particularly for women and girls, for other groups who may be vulnerable to crime or the fear of crime, and for those with limited mobility).'*

The NPPF also supports the provision of high-quality communications infrastructure as set out within the introduction to Chapter 9. Other relevant sections are also highlighted below:

> *Introduction – 'The objective of the policies in this chapter is to support the expansion and upgrading of telecommunications infrastructure, in ways which limit an unnecessary proliferation of equipment and respect important environmental safeguards. Advanced, high quality and reliable communications are essential to meet changing technological, social, business and security requirements (including through delivering coverage of higher quality standalone 5G in all populated areas by 2030, and nationwide gigabit-capable broadband by 2032).'*

> *'Policy CO1(1) – In considering proposals for the expansion or upgrading of electronic telecommunications networks, substantial weight should be given to the benefits of maintaining or improving network coverage, capacity, reliability and resilience, including where significant improvements are required such as along rail corridors. This includes, but is not limited to, providing for next generation wireless technologies (such as standalone 5G), gigabit capable broadband connections and supporting infrastructure such as fibre exchanges.'*

> *'Policy CO1(1a) – Use existing masts, buildings and other structures already employed for this purpose, upgrade, or replace existing infrastructure, unless there is no reasonable opportunity to do so (taking into consideration meeting consumer needs, the efficient operation of the network and providing reasonable capacity for future expansion)'.*

> *'Policy CO1(2) – In assessing proposals for telecommunications infrastructure, local planning authorities should not require minimum distances to be maintained between telecommunications infrastructure and other development, seek to prevent competition between different operators, question the need for the expansion or upgrading of telecommunications networks, or use health safeguarding standards different from the International Commission guidelines on non-ionising radiation protection'.*

At the heart of the NPPF is the retained presumption in favour of sustainable development (Chapter 4 Achieving sustainable development, Policy S4(1)):

> *'Development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework.'*

The NPPF continues to provide guidance on decision-making within Chapter 3 Decision-making policies:

> *'The objective of the policies in this chapter is to ensure that development proposals are informed by appropriate information and decided in a way which is proportionate, timely and effective*.'

> *'Policy DM3 - Determining development proposals (1)(f) When considering development proposals, local planning authorities should: Not refuse applications for development which should clearly be approved, having regard to their accordance with the development plan, the policies in this Framework and any other material considerations*.'

The NPPF builds on the aspiration to build a strong, effective economy within Chapter 7 where policies should:

> *'enable businesses to invest, expand and adapt in a way that reflects the opportunities, challenges and characteristics of different areas, and supports long-term economic growth both locally and nationally.'*

Policy E1(1)(a) goes onto state that development plans should:

> *''Set out a clear economic vision and strategy, which takes a positive, proactive and realistic approach to encouraging sustainable economic growth in both urban and rural areas, having regard to the Industrial Strategy and any relevant strategic and local strategies for economic development and regeneration. In doing so plans should take into account both local business needs and wider needs and opportunities for economic growth and investment.'*

Code of Practice for Wireless Network Development in England (March 2022)

The Code of Practice has been fully revised, and the latest version was published by DCMS in March 2022. It acknowledges that the planning system plays a key role in delivering the digital infrastructure that we need, in a sustainable and well-designed way, especially as households and businesses become increasingly reliant on mobile connectivity. The principal aim of the Code is to

support the Government's objective of delivering high-quality wireless infrastructure whilst balancing these needs with environmental considerations. It also has an important role in making sure that appropriate engagement takes place with the local communities and other interested parties.

The Code of Practice covers all forms of wireless infrastructure development, including mobile towers and cabinets. It is recommended that other wireless communications operators follow the principles of this Code of Practice, where appropriate.

Unlike previous iterations, this Code of Practice has been led by the Department for Digital, Culture, Media and Sport (DCMS) and developed in collaboration with representatives of the mobile network industry, other government departments and public bodies, local planning authorities, and protected landscapes. This document replaces the previous Code of Best Practice on Mobile Network Development, which was published in 2016 and is now published by DCMS.

The Code of Practice sets out the legal and policy framework for the delivery of wireless infrastructure development.

Paragraphs 8 – 12 of the Code of Practice set out the importance of connectivity:

> '8. *Digital connectivity is vital to enable people to stay connected and businesses to grow. Fast, reliable digital connectivity can deliver economic, social and well-being benefits for the whole of the UK.*
>
> *9. As the demand for mobile data in the United Kingdom is increasing rapidly, it is important that everyone has access to dependable and consistent mobile coverage where they live, work and travel.*
>
> *10. The Future Telecoms Infrastructure Review (FTIR) and the National Infrastructure Strategy set out the government's long-term strategy for meeting its digital connectivity targets and delivering high-quality, the reliable digital infrastructure that works across the UK.*
>
> *11. The government has committed to extending mobile coverage across the UK. The government's Levelling Up White Paper has set a mission that the UK will have nationwide 4G coverage, with 5G coverage for the majority of the population by 2030. In support of this, the government and the UK's mobile network operators agreed to a £1 billion Shared Rural Network deal to extend 4G mobile geographical coverage to 95% of the UK by the end of the programme.*

9. *Next Generation Mobile Technologies: A 5G Strategy for the UK, and the update to this, set out the government's ambition for the UK to be a global leader in 5G to take early advantage of its potential and help to create a world-leading digital economy that works for everyone. The government also wants businesses and communities to benefit from investments in 5G as soon as possible. Through the government's 5G Testbeds and Trials programme we have seen its value to manufacturing, farming, transport networks and healthcare.*

The Government recognises the key role that the Planning System plays in delivering the digital infrastructure that we need, in a sustainable and well-designed way, especially as households and businesses become increasingly reliant on mobile connectivity.

The Code of Practice sets outs 'How wireless networks function'.

Para. 16 states *"Cellular wireless networks use base stations to provide an area of radio coverage. Wireless technology uses the radio spectrum to broadcast radio waves between base stations and devices. Different radio frequencies have different characteristics which, along with the density of cell site locations, affect the extent of coverage and how much data can be carried over the network. Depending on the radio frequencies used, base stations can deliver coverage over a wide area or provide extra network capacity in areas where there is a high demand for network bandwidth".*

Para. 17 sets out that *"Wireless technology continues to evolve rapidly, and mobile devices are now capable of much more. Second-generation (2G) technology gave us voice calls and text messages, 3G led to the launch of smartphones, and 4G, which enabled faster browsing, allowed us to do things like watching videos on the move. 5G, the latest generation of wireless technology, is much faster than previous generations of wireless technology and can offer greater capacity and lower latency, allowing thousands of devices in a small area to be connected at the same time. 5G networks, and future mobile generations, will be vital for a range of Internet of Things uses (IoT) and Smart City applications".*

The Code of Practice establishes 'Principles and commitments' by which operators should develop their networks and that Local Planning Authorities should demonstrate their support.

The Code of Practice also sets out the requirements of the LPA in relation to the deployment of digital infrastructure:

- Incentivising connectivity: support the expansion of telecommunications networks and take a 'joined-up' approach to the wireless infrastructure planning process, including ensuring that Local Plans effectively support the deployment of digital infrastructure.

- Facilitating sites: engage with operators when new sites have been proposed and discuss site requirements.
- Engagement with operators: respond positively to requests for engagement and make decisions in line with national policy and Local Plans. For planning applications, find solutions to issues and ensure timely decisions are made.

The added emphasis on support from Local Planning Authorities in the deployment of digital infrastructure is even more evident in the revised Code of Practice. The Code of Practice recognises the importance of collaboration and partnership to help drive network coverage across the country. It goes on to state that *'In all instances, it is important for all parties involved in the process to take a positive approach to consultation and engagement'.*

LOCAL PLAN ASSESSMENT

The London Plan, 2021

A new London Plan was adopted in March 2021. In a similar fashion to the previous London Plan (2016), the new London Plan sets out the Mayor's planning strategy for Greater London and contains strategic thematic policies, general crosscutting policies and more specific guidance for sub-areas within the Metropolitan Area. In '*Policy SI 6: Digital Connectivity Infrastructure*' the Plan recognises the strategic importance of providing the necessary infrastructure, including modern communications networks, that London requires to ensure its global competitiveness, now and in the future.

It is considered that the Operators' networks are an integral element in securing the Mayor's vision for the delivery of modern communications networks across London. The written justification for Policy SI 6 states the following:

"*The **provision of digital infrastructure** is as important for the proper functioning of development as energy, water and waste management services and should be treated with the same importance. London should be a world-leading tech hub with world-class digital connectivity that can anticipate growing capacity needs and serve hard to reach areas. **Fast, reliable digital connectivity is essential in today's economy and especially for digital technology and creative companies. It supports every aspect of how people work and take part in modern society, helps smart innovation and facilitates regeneration…***

Boroughs should encourage the delivery of high-quality / world-class digital infrastructure as part of their Development Plans".

Policy SI 6, and its written justification, is clearly supportive of the proposal and the role it will perform allowing to provide enhanced coverage to the surrounding area.

In addition to a specific digital policy, there are the following policies within the London Plan which are considered, where applicable, relevant and in accordance with this case:

CG1 – Building strong and inclusive communities
SDG6 – Town centres and high streets
D5 – Inclusive design
D8 – Public realm
D11 – Safety, security and resilience to emergency
S1 – Developing London's social infrastructure
E1 – Visitor infrastructure
HC6 – Supporting the night-time economy
SI 1- Improving air quality

London Infrastructure Delivery Plan 2050 (published 2014):

As part of the work on the 2015 London Plan Alterations, the Mayor commissioned work to develop a long-term infrastructure investment plan for London, and in 2014 the 'London Infrastructure Delivery Plan 2050' was published. The stated aim of the Infrastructure Delivery Plan is to provide for fast, ubiquitous access to the internet from mobile and fixed devices. Chapter 16 of the Plan, Digital Connectivity, indicates how the Mayor's Office will support a mix of technologies including mobile broadband and future methods of wireless internet delivery to address the capacity crunch in the short term, as well as aiming to make London the first capital city in the world to deploy 5G in the 2020s. Deployment of the proposed base station will contribute to London's agenda for reliable high-speed communications as it has been designed to incorporate emerging and future technologies. Among other matters the Delivery Plan stated:

"*Broadband is now considered the fourth utility. The Government has stated that it wants 99% of the population to have superfast connections by 2018. Internet access speeds and coverage affect the productivity of businesses and are now a factor considered by homebuyers. Access is not only essential to many businesses, but also, as more local authorities are encouraged to move the services they provide online, access is essential for residents to be able to take part in a modern society. The Mayor wants every resident and business in London to be able to have affordable high-speed internet connectivity, should they choose to access it".*

This proposal seeks, individually, to provide high speed internet connectivity throughout London and create a connected city as per chapter 6 of the Plan. The upgrading of Street hubs and installation of new sites will actively contribute to this policy.

London Borough of Hillingdon – Local Plan: Part 1, Strategic Policies (Adopted November 2012).

It is considered that the following Local Plan policies are applicable, and that the proposed development accords with these policies:

The proposed development will help the Local Authority achieve its strategic objectives outlined within the Local Plan, specifically:

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

By replacing the aging legacy kiosk estate with the modern equivalent, the proposal contributes to the renewal and regeneration of the public realm within the Local Authority area. The 'free' digital services provided by the proposed Unit align with the direction of travel across the Country, with access to digital services no longer considered a luxury, but rather an everyday necessity.

- "*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 Street Hub 3 Unit is a modern minimalistic design which can be absorbed into busy and vibrant streetscenes. Any impact that is has is seen at ground-level. Given that there are a plethora of colourful shop frontages surrounding the application site, forming a busy shopping promenade, it is considered that infrastructure such as that proposed, would be expected in such a setting. This is demonstrated by the fact that a BT unit has sat in situ, at the application site, for at least 18 years and has already been upgraded once (from a legacy kiosk to an ST6 unit).

Whilst it cannot be suggested that the proposed Street Hub 3 Unit is 'attractive', it most certainly demonstrates the highest standard of 'urban design quality'. The Street Hub itself is standard in nature – i.e. Street Hub 3 Units deployed in Newcastle upon Tyne are exactly the same as those deployed in Cardiff. Given that over 500 are now deployed across the UK's major cities, with circa another 200 planning approvals secured and awaiting deployment, it is considered that the Street Hub 3 Unit is wholly appropriate for busy and vibrant streetscenes such as 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*".

As outlined above, the Street Hub 3 Unit provides free Wi-Fi connectivity for anyone with a mobile handset, as well as free calls for those who have no handset. There are also a plethora of other digital features and functions provided by the Unit. As will be discussed later in this document, it is clear that

the general public are interacting with the existing digital estate and availing of the free services provided. This is expected to continue as more units are deployed nationwide, with clear public benefits evident within the public realm. Access to these free digital services will help bridge the digital divide and ensure digital exclusion is reduced, as far as practicable. These free services will be available to residents, businesses, commuters and visitors to the local area – which can only be seen as a positive impact on the surrounding area.

Justification for the proposed Street Hub 3 Unit against Planning Policy

It is not anticipated that the deployment of this street furniture will result in any notable town planning or environmental impacts, and certainly not enough to justify the refusal of planning permission, or the grant of Advertisement Consent. It is submitted, in fact, that the deployment of this street furniture aligns with the Council's own Local Planning Policies and will result in an improved streetscene.

It should be acknowledged that the free public benefits provided by the Street Hub 3 Unit are only viable due to the financial revenue created by the Unit's digital screens. Simply put, without the screens; a) the Street Hub 3 Unit cannot provide these services, and b) the legacy kiosk can therefore not be removed from the streetscene. This is a material planning consideration, as it directly feeds into the transformation and modernisation of BT's legacy estate, with the introduction of smart technology to the immediate area, via the provision of **free** public wi-fi and **free** public telephone calls, plus a plethora of other digital services. As this transformation and modernisation of the streetscene has been considered acceptable elsewhere within the Local Authority area, on x10 separate occasions (x5 Street Hubs are deployed, x5 approved Street Hubs are awaiting deployment) it is submitted that the same acceptance should be forthcoming at the application site.

Relevant Allowed Appeals relating to the upgrading of existing legacy kiosks:

There are now numerous recent examples where the Planning Inspectorate have shown clear support for the upgrading of legacy kiosks. In February 2026, the decision of the London Borough of Haringey Council to refuse planning permission and advertisement consent for the removal of a legacy KX100 telephone kiosk and the deployment of a replacement Street Hub 3 Unit, was **overturned** by the Planning Inspectorate (BT Telecommunications PLC Vs London Borough of Haringey Council, appeal references APP/Y5420/W/25/3376256 & APP/Y5420/H/25/3376253). The appeal site was within the Stroud Green Conservation Area (the CA). In allowing these appeals, the Inspector offered the following comments in their Appeal Decision:

> *"Whilst marginally taller and wider than the existing phone box,* ***the slim profile of the proposal would reduce its overall bulk such that it would not be unacceptably prominent in the street scene with a negligible projection further into the footway****. Additionally, it would be set against the backdrop of the plethora of surrounding street furniture, most notably the bus shelter.* ***The replacement of the existing phone box would mean that it would not add to the existing amount of street furniture and***

***therefore would not result in any unacceptable clutter**. **The appearance of the advertisement displays within the hub would not be unusual in this commercial context and given their size**, they would not appear prominent, set against the scale of the buildings in the immediate vicinity. The highway is well-lit by street lighting and as such, the illumination of the advertisements would not appear out of place or obtrusive. **Overall, the scheme would preserve the character and appearance of the CA**"* (emphasis added).

In May 2026, the decision of the Council of the London Borough of Southwark to refuse planning permission and advertisement consent for the removal of a KX100 legacy kiosk and the deployment of a replacement Street Hub 3 Unit, was **overturned** by the Planning Inspectorate (BT Telecommunications PLC Vs the Council of the London Borough of Southwark, appeal references 6004995 & 6004996). The appeal site was within the Walworth Road Conservation Area. In allowing these appeals, the Inspector confirmed the following within their Appeal Decision:

*"**the proposed Street Hub structure would be sited within a section of the footway where it would be unobtrusive** and in broad association with the trees and the other street furniture nearby. **It would replace the dilapidated phone kiosk and its removal would be a visual benefit.** Such additions as the Street Hub on part of the footway are fairly typical of this length of Walworth Road and given the immediate surroundings with the modern frontage to the Morrisons supermarket, **the Street Hub would not appear as an unusual or unduly prominent feature in this part of the road.***

*The digital advertisements would be illuminated, including in the evenings. However, this part of Walworth Road is a busy commercial street with a night time economy and **the advertisements would not look out of place with other illuminated features, shop fronts and the wider activity.***

***In all the circumstances of this case**, the Street Hub within this part of the footway and adjoining the supermarket, **in association with the removal of the detracting visual appearance of the phone kiosk, would not result in a cluttered or harmful appearance. It would be appropriately located within this urban street scene and would not cause cumulative harm with the other street items in the vicinity. Even with the use of the LCD screens, I am satisfied that it would preserve the character and appearance of the CA.** The duty under s72 of the Act would be met, as well as the requirements of the Framework. In these circumstances I find no harm to the character and appearance of the area. I also consider that there would not be any conflict with the designation of the area as Inner London's first Heritage Action Zone".* (emphasis added)

As the scheme now before the Local Authority relates to an ST6 Unit conversion, it is submitted that the same conclusions can be drawn, as outlined by the Planning Inspector's in the examples above – i.e. that the proposed upgrade is wholly compliant with local policy, as well as an expectation of what a busy streetscene should include, even within a Conservation Area.

In the Decision Notice for appeals 6004995 & 6004996, the Planning Inspector offers the following comments:

> "***Along the length of Walworth Road there is a mix of many different types of street furniture within the footway. These include bus stops with advertisements, other structures similar to the Street Hub with digital advertisements, phone kiosks, waste bins, lighting columns, traffic lights and their control boxes, and trees***. *These are all evident along parts of the footways and while in places they may be quite apparent,* ***such additions are a feature that is not generally out of place within this busy commercial street with its pedestrians, regular buses and general traffic****, and the wide variety of shop fronts with all their trading activity.*
>
> *Outside the modern Morrisons supermarket frontage there is a reasonably wide section of the footway which includes an area where there are three public bench seats, two trees, a dilapidated phone kiosk and a small section of railings attached to the building. The phone kiosk would be removed and replaced by the Street Hub.*
>
> *I have carefully considered the views of The Walworth Society and others objecting to the scheme. However, the proposed Street Hub structure would be sited within a section of the footway where it would be unobtrusive and in broad association with the trees and the other street furniture nearby. It would replace the dilapidated phone kiosk and its removal would be a visual benefit.* ***Such additions as the Street Hub on part of the footway are fairly typical of this length of Walworth Road and given the immediate surroundings with the modern frontage to the Morrisons supermarket, the Street Hub would not appear as an unusual or unduly prominent feature in this part of the road.***
>
> *The digital advertisements would be illuminated, including in the evenings. However, this part of Walworth Road is a busy commercial street with a night time economy and* ***the advertisements would not look out of place with other illuminated features, shop fronts and the wider activity****…*
>
> *… The Street Hub would be positioned broadly in line with the existing street furniture and, even taking into account the railings,* ***would maintain a footway width of approximately 2.5m, which the Council has confirmed would meet the minimum standard set out in the Streetscape Design Manual****. In these circumstances, and having regard to my*

observations at my site visit of ***the position in relation to other street furniture within this straight section of footway, the introduction of the Street Hub would not cause any undue harm to pedestrian movement or safety.***

I have noted the highway objections from consultees, although these did not form a reason for refusal. I am satisfied that within this busy and straight street, and with the structure with advertisements set back from the carriageway edge, that there would be acceptable effect on highway safety for vehicles using this section of Walworth Road.

I have also taken into account the further concerns of The Walworth Society regarding danger and anti-social behaviour that could result from the Street Hub. While the Street Hub would provide a solid structure it would have space around it and be in an open position within the footway such that it should not present a feature that would pose a danger after dark with people hidden from view. ***In many respects it would be similar to other digital advertisements and bus shelters that are a feature of the area***." (emphasis added).

In June 2026, the decision of the Council of the Royal Borough of Kensington and Chelsea to refuse planning permission and advertisement consent for the removal of a ST6 Unit and the deployment of a replacement Street Hub 3 Unit, was **overturned** by the Planning Inspectorate (BT Telecommunications PLC Vs the Council of the Royal Borough of Kensington and Chelsea, appeal references 6003655 & 6003653). The appeal site was within the Edwardes Square, Scarsdale and Abingdon Conservation Area (the ESCA), and within the setting of the Kensington Conservation Area (the KCA). In allowing these appeals, the Inspector confirmed the following within their Appeal Decision:

*"****Kensington High Street is a busy arterial route defined by a commercial streetscape with signage, lighting and street installations****.* ***The existing ST6 unit is a utilitarian structure*** *with a static, nonilluminated advertisement* ***and forms part of the established street furniture****, alongside bus shelters and other infrastructure.*

The proposed Street Hub would replace this with a more contemporary unit of similar function, combining communications equipment and digital display within a single structure. ***Although more modern and capable of illumination, it would be comparable in overall presence, with a reduced depth and footprint. It would therefore read as a logical evolution of existing street furniture within the High Street environment, rather than a materially more intrusive addition.***

Given the separation provided by Kensington High Street and the already urbanised character of the frontage, the proposal would not materially affect the significance of the KCA. Its effect on the setting of that conservation area would therefore be neutral, thus preserving its significance.

Turning to the advertisements, illuminated digital displays are already present on nearby bus shelters on both sides of Kensington High Street, within both the ESCA and the KCA, establishing that such displays form part of the prevailing townscape.

***While the Council raises concerns about cumulative impacts and clutter, these advertisements exist within an established commercial environment defined by active shopfronts, signage, street furniture and transport infrastructure**. Although the proposed displays would be double-sided and brighter than those on the existing unit, **they would remain consistent with the High Street's commercial function and would not introduce an unfamiliar form of advertisement. Within this existing context, they would not appear dominant or intrusive**".*

Relevant Appeals relating to the deployment of 'new' Street Hub 3 Units (i.e. not replacing a legacy kiosk):

The Planning Inspector has also repeatedly confirmed their position in the acceptability of 'new' Street Hubs being deployed within the streetscene, where appropriate. Whilst it is acknowledged that the proposal now before Council relates to the upgrading of established and long-standing street furniture, some of the points raised by the Inspector's, in their Decision Notices, are considered relevant to this proposal

In June 2026, the decision of the Council of the London Borough of Barnet to refuse planning permission and advertisement consent for the deployment of a Street Hub 3 Unit, was **overturned** by the Planning Inspectorate (BT Telecommunications PLC Vs the Council of the London Borough of Barnet, appeal references 6006328 & APP/N5090/Z/26/3378185). In allowing these appeals, the Inspector confirmed the following within their Appeal Decision:

*"**Although the proposed Hub would add to the street furniture in this area, given the width of the pavement, it would not unduly impact on, or harm, the spacious layout of the footway**. It would be viewed as a discrete element on this section of the pavement to the east side of the road, but would be seen within the wider context of nearby street furniture.*

*Whilst the Hub would be visible in views along Edgware Road from both directions it would be seen in the context of advertisements on the bus shelter and petrol station opposite, and those in the wider environs. **Whilst existing advertisements do not, in themselves, justify additional advertisements, given the general commercial character of the area the proposed development would not appear incongruous, visually obtrusive, or excessive**.*

> ***The scale of the proposed Hub would be comparable to the advertisements on the bus shelter opposite****, and with similar installations to either side of Edgware Road, both to the north and south of the appeal site.*
>
> *For these reasons,* ***I conclude that the proposed development would not harm amenity and the character and appearance of the area****"* (emphasis added).

In April 2026, the decision of the Council of the London Borough of Southwark to refuse planning permission and advertisement consent for the deployment of a Street Hub 3 Unit, was **overturned** by the Planning Inspectorate (BT Telecommunications PLC Vs the Council of the London Borough of Southwark, appeal references 6004993 & 6004992). In allowing these appeals, the Inspector confirmed the following within their Appeal Decision:

> *"****Advertisements and street furniture are already prevalent along London Road and in the wider area.*** *This includes illuminated and non-illuminated shopfront signage, bus shelters with integrated advertisements, street lighting, traffic signs and other highway furniture.* ***Advertising therefore forms part of the established street scene, and in this context the proposed street hub would not appear incongruous or out of character****.*
>
> *The street hub would be aligned with the existing corridor of street furniture, which would maximise usable pavement space and avoid a cluttered appearance.* ***In the busy context of London Road, the proposal would not result in visual harm****.*
>
> ***With regard to potential driver distraction, the street hub would be positioned away from junctions on a straight section of road with good forward visibility. Its orientation would align with the normal line of sight for drivers, avoiding any need to divert attention from the carriageway.*** *In addition, conditions would control illumination levels, prohibit moving images or rapid sequencing, and require minimum display times. Taken together, these factors would ensure that the proposal would not result in driver distraction or give rise to highway safety concerns"* (emphasis added).

In February 2026, the decision of the Local Authority to refuse planning permission and advertisement consent for the deployment of a Street Hub 3 Unit, was **overturned** by the Planning Inspectorate (BT Telecommunications PLC Vs the Council of the London Borough of Brent, appeal references APP/T5150/W/25/3372621 & APP/T5150/H/25/3372623). In allowing these appeals, the Inspector confirmed the following within their Appeal Decision:

> *"I carried out my site visit at around dusk on a weekday evening and saw that, as well as various shopfront displays, there are some other illuminated advertisements nearby. These give the area a moderately vibrant, though not excessively garish, commercial character which is in keeping with its neighbourhood parade status.* ***The appeal site is reasonably***

well-separated from other on-street advertisements such as those on freestanding displays and the bus shelters west of Harrowdene Road, so the proposal would not lead to a harmful over-concentration of advertisements**. Overall, **neither the hub itself nor the display advertisements would be unexpected or incongruous elements in their surroundings.

*I acknowledge that the Council is concerned that the introduction of a new hub at this location would run contrary to its aim of decluttering the public realm. However, **the appellant's evidence is that the proposed installation would be accompanied by the removal of two existing telephone kiosks**; the one immediately adjacent to No 181 East Lane described above, and another on the north side of the street alongside No 2 Peel Road. **There would therefore in fact be a net decluttering of the public realm in the vicinity of North Wembley Station. This is a benefit which I consider carries moderate weight in favour of the appeal scheme**, although so that it can be secured it is necessary to impose a condition requiring the existing kiosks are removed in a timely manner.*

*Taking all this together, in respect of Appeal A **I conclude that the development would not cause unacceptable harm to the character or appearance of the area**. There would therefore be no conflict with Policies DMP1 and BD1 of the BLP or Policy D8 of the London Plan 2021. Together, and among other things, these policies seek to ensure that development is of acceptable in location, siting, scale, materials, detailing and design so that it complements the locality; that advertisements minimise intrusive lighting, and that unacceptable cluttering of streets is avoided"* (emphasis added).

In February 2026, the decision of the Local Authority to refuse planning permission and advertisement consent for the deployment of a Street Hub 3 Unit, was **overturned** by the Planning Inspectorate (BT Telecommunications PLC Vs the Council of the London Borough of Brent, appeal references APP/T5150/W/25/3372626 & APP/T5150/H/25/3372627). In allowing these appeals, the Inspector confirmed the following within their Appeal Decision:

*"**The area has a vibrant nature in keeping with its status as a suburban district centre; some advertisements would be an expected and normal part of that character**. The advertisements I saw do not dominate the area either by sheer volume, or by being garish or otherwise intrusive. **The appeal site is reasonably well-separated other street advertisements, so the proposal would not lead to a harmful concentration of advertising in the locality.***

*Taking all this together, in respect of Appeal A I conclude that **the development would not cause unacceptable harm to the character or appearance of the area**.*

The first element of the Council's concern in relation to public safety is that the proposed hub would impede safe use of the footway by constraining pedestrian movement. ***Based on everything I have seen I am satisfied that the proposed hub unit would be unlikely to have a materially detrimental effect on safe and comfortable pedestrian circulation****.*

The second element of the Council's safety concern is that drivers travelling along Edgware Road might be distracted by the illuminated digital advertisement.

*…****drivers would, or should, be attuned to the town centre environment and expecting to see advertisements, and those proposed here would not be in intrusive or distracting positions****.*
The proposed installation would not obstruct sight lines for drivers of vehicles wishing to turn off, or enter, the main road, so the advertisements would therefore be unlikely to represent a significant distraction.

Taking all of these points together, in respect of Appeal A I conclude that the development would not result in harm to highway and pedestrian safety" (emphasis added).

In November 2025, the decision of the Local Authority to refuse planning permission and advertisement consent for the deployment of a Street Hub 3 Unit, was **overturned** by the Planning Inspectorate (BT Telecommunications PLC Vs the Council of the London Borough of Brent, appeal references APP/T5150/W/25/3372638 & APP/T5150/H/25/3372640). In allowing these appeals, the Inspector confirmed the following within their Appeal Decision:

"…as the Council also accept, ***the retained generous pavement width would provide adequate space for pedestrians****, including those with mobility issues and pushchairs to safely pass one another. For the same reasons I was not convinced the proposal's location would cause an unacceptable obstruction to cyclists. Therefore,* ***the siting of the proposed hub would not adversely affect active and sustainable travel movements along the pavement.***

It is acknowledged that the purpose of the proposed hub is to draw attention to its advertising. ***However, there are also other similar digital displays along Edgware Road, and its siting, scale, and appearance would not represent a significant distraction, even taken cumulatively with others nearby, to drivers alongside the demands of navigating this section of road, and responding to traffic signs and other highway users****.*

I therefore conclude that in terms of Appeal A, the proposals would not be harmful to highway or pedestrian safety, and in terms of Appeal B they would not be harmful to public safety.

Although the proposed hub would add to the street furniture in this area, ***given the significant width of the pavement****, and the spaced arrangement of nearby structures, and its proposed alignment with the bus shelter****, it would appear legible and not create an unacceptable clutter of street furniture in this area****. Moreover, its limited scale, size and* ***high-quality appearance would harmonise with other nearby structures****, including the height and appearance of the bus shelter and it would not appear obtrusive, nor would it harm the spacious layout of the pavement area"* (emphasis added).

In December 2025, the decision of the Local Authority to refuse planning permission and advertisement consent for the deployment of a Street Hub 3 Unit, was **overturned** by the Planning Inspectorate (BT Telecommunications PLC Vs the Council of the London Borough of Brent, appeal references APP/T5150/W/25/3373084 & APP/T5150/H/25/3373085). In allowing these appeals, the Inspector confirmed the following within their Appeal Decision:

The Council has said the location of the proposed hub would adversely affect the Highway Authority's ability to manage the highway, although there has been no evidence to substantiate this statement or explain why, or how it would do so. From my own site observations, ***it would represent a relatively small footprint in a wide and spacious pavement and in view of my findings above, not have any unacceptable highway or public safety impacts.*** *Consequently, that argument advanced by the Council has not altered my findings in this case.*

It has been said that the colour and shape of advertisements on the proposed hub could display signs that confuse the layout of the highway. However, conditions have been suggested to ensure no advertisement resembles a road traffic sign, along with other measures, such as a short interval between advertisement changes, and regarding the duration of each single static advertisement, which should satisfactorily address such concerns and reasonably minimise any such risks.

*I therefore conclude that in terms of Appeal A****, the proposals would not be harmful to highway or pedestrian safety****, and in terms of Appeal B* ***they would not be harmful to public safety****.*

In addition, in view of my findings above ***the proposals would be consistent with the submitted extracts of Principle 2 of Brent's Supplementary Planning Document 1*** *– Brent Design Guide, dated November 2018, and B1 of Brent's Supplementary Planning*

Guidance 8 – Advertisements (Other than shops) dated 2004, insofar as they seek to ensure proposals respond to existing context, respect character, and that advertisements on street furniture should make a positive contribution to the local environment and not add to general advertisement clutter" (emphasis added).

In April 2026, the decision of the Council of the London Borough of Haringey to refuse planning permission and advertisement consent for the deployment of a Street Hub 3 Unit, was **overturned** by the Planning Inspectorate (BT Telecommunications PLC Vs the Council of the London Borough of Haringey, appeal references APP/Y5420/W/25/3376336 & APP/Y5420/H/25/3376334). In allowing these appeals, the Inspector confirmed the following within their Appeal Decision:

"Whilst the buildings forming the parade are reasonably attractive, ***there is a notable amount of signage associated with the commercial premises in addition to street furniture such as cycle hoops, bins, a grit bin, and a bus shelter with digital advertising displays, reflective of its more commercial character****. The existing street furniture and proximity of the adjacent buildings means that this section of pavement makes a limited contribution to the openness of the street scene.*

The proposal would have a relatively slim profile to reduce its overall bulk, its height and width would be commensurate with the side profile of the nearby bus stop facilitating its assimilation with the surrounding street furniture. Further, ***its position towards the outer part of the highway would mean that it would be approximately in line with the surrounding street furniture such as the bus stop, and viewed within this context by those travelling along the highway.*** *This, in combination with the relatively wide section of pavement, would maintain an existing moderate gap between the street furniture and the commercial premises.* ***The retention of this gap and alignment with surrounding street furniture would minimise the proposal's contribution to any perceived additional visual clutter and effect on the buildings forming the parade, preserving the character and appearance of the street scene.***

Consequently, in respect of Appeal A, I conclude that the proposed development would not result in harm to the character and appearance of the area.

The existing street furniture's location, including that of the proposal, towards the edge of the pavement in combination with the relatively wide footway, would continue to provide ample space for passing pedestrians. ***This would include those using wheelchairs, prams, the elderly or those with impaired vision, to pass freely along the footway between the furniture and the shop fronts. As such I do not consider that the proposal would unacceptably reduce footway space or harm pedestrian safety.***

The Planning Practice Guidance acknowledges that advertisements are intended to attract attention. This in and of itself is not a prohibitive factor of advertisements.

The hub would be located along a section of highway that is fairly wide and straight, offering good visibility along it for passing road users and pedestrians. It would be relatively close to two junctions, bus stops and lanes, and a pedestrian crossing with traffic lights at the four way junction further along Priory Road. The hub would be recessed from the edge of the pavement so as to continue to offer good visibility along the highway for those using the nearby pedestrian crossing. ***In combination with the open linear character of the highway, the proposal would allow good visibility for pedestrians and motorists giving them sufficient time to react and safely navigate any potential hazard, even considering the high level of foot traffic. Further, given the commercial nature of this area and the existence of other advertising, the proposal would be seen in this context and not appear as an isolated and prominent feature, therefore minimising any distraction to passing motorists and pedestrians".***

The proposed advertisement would be designed to draw attention. However, the significant distance to the traffic signals at the four way junction further along Priory Road mean that it is unlikely to conflict and distract from these.

Research has identified that static and video adverts can affect drivers' visual behaviour and driving performance. However, in this well-lit location the use of illumination would not appear unduly distracting or as an unusual and overly prominent feature. Moreover, ***illumination levels, display times, restrictions on moving imagery, could all be controlled through condition*** *were I minded to allow the appeal. In combination with its relatively modest scale,* ***the proposal would be unlikely to distract pedestrians and road users to an extent so as to cause an unacceptable impact on highway safety"*** (emphasis added).

Taking the ten appeal decisions above into consideration, there is clear support for the from the Planning Inspectorate that the proposed Street Hub 3 Unit is acceptable within vibrant and commercial settings, even within Designated Areas, and especially where the Street hub will replace an existing legacy kiosk. As outlined within this application, a ST6 unit will be removed and replaced by the most modern BT street furniture. This is similar to the previous upgrade undertaken at this location, which saw the removal of two legacy kiosks and the deployment of a replacement ST6 unit. Whilst the above appeals have been appended to this application, for ease of reference, there are now a plethora of similar appeal decisions which support the deployment of BT Street Hubs across multiple Local Authority areas across the UK. The Applicant submits that, whilst the settings may be different, the assessment and, ultimately, the conclusions drawn, are largely similar.

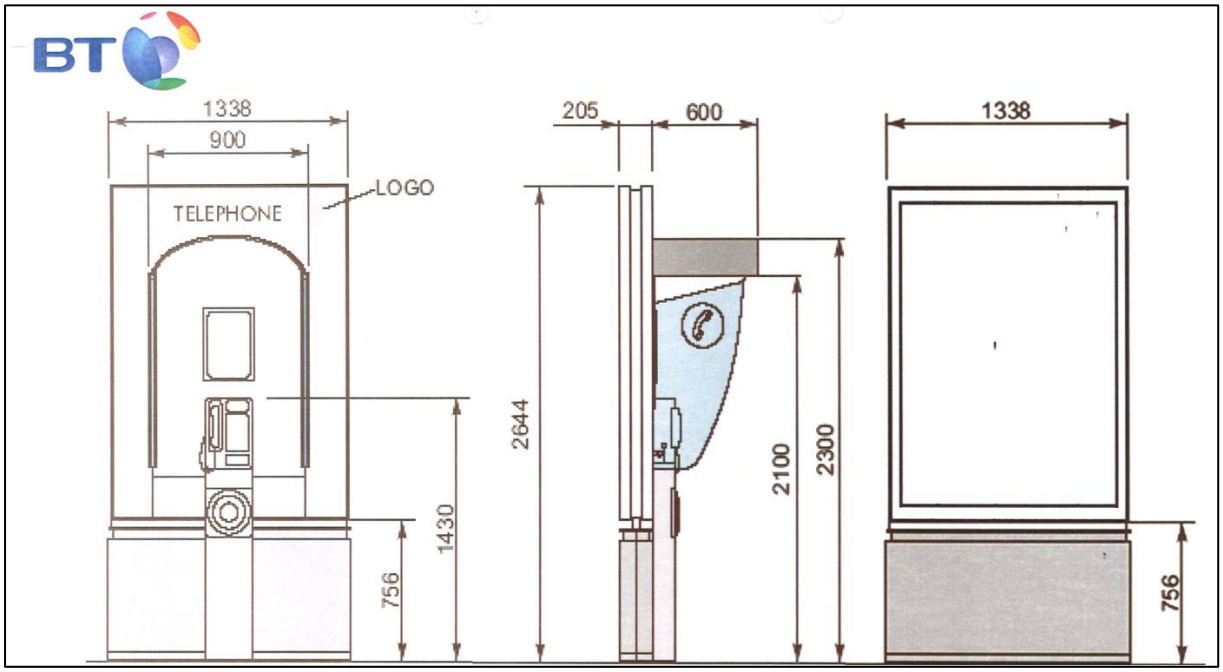
The Need for the Development and Associated Public Benefit:

The proposed development seeks to deploy a Street Hub 3 Unit which will provide **free** public wi-fi, **free** UK calls, USB charging, wayfinding assistance, an emergency services button, plus a range of other digital services for those in the vicinity. The LED display screens on each side of the Unit will carry advertising, which helps fund the free public services.

The Dimensions of the proposed BT Street Hub 3 are also shown below:
2986mm (h) x 1236mm (w) x 350mm (d)



When compared to the ST6 unit (dimensions shown below) which is currently deployed, it should be acknowledged that the Street Hub unit is both less-wide and less-deep than the existing unit. The result will be more footway returned to pedestrian use, assisting the Highways Authority in their management of the highway network.



In addition, 5% of the monthly screen time, which equates to circa 875 hours a year, is provided to the Local Authority, for **free**. This screen time is 'ring-fenced' and the Local Authority can carry any specific messaging they desire on the Units. This was particularly important during the Covid-19 pandemic and allowed Local Authorities across the UK to display public service messages from the UK Government, the NHS, the Chief Medical Officer, or any Public Health organisation, on BT InLink Units.

Local Authority-specific messaging can also be provided during the 5% free screen time, such as road closers, transport delays, etc.

At a time when public reliance on data consumption is ever-increasing, it should be noted that free public wi-fi is provided from each and every Street Hub 3 Unit across the UK. Access to such infrastructure, and its free services, provides significant public benefits, which is essential for sustainable economic growth and plays a vital role in enhancing the provision of such services within the local area. This type of free connectivity allows residents, businesses, and visitors to the area to access essential public networks and assists in reducing digital exclusion within the Local Authority area.

BT's current InLink and Street Hub estate consists of approximately 1000 Units, across 23 UK cities, and all London Boroughs. The number of these Units are anticipated to increase, as BT removes older, underused telephone kiosks from streetscenes and replaces them with Street Hub 3 Units. The usage levels of the entire estate, from the period of 1st April 2024 to 31st March 2025 are provided below. During this time period:

- Over **1.6 million phone calls** were made, including:
    - 1,464 to **Childline**

- 4,465 to **End Youth Homelessness**
- 1,528 to **Samaritans**
- 1,097 to **Missing People**

- **3.9 million people** connected to free Wi-Fi, with **780,254 new users** registering this year.

The above data is a clear indicator of the value that the existing Units bring to the general public. Just under **6% of the UK's population connected to the free wi-fi in the last 12 months, with new users being added continuously throughout the year**. This trend is expected to continue throughout 2026 and beyond, especially as BT continue to expand their estate across the UK.

Given that the Local Authority currently accommodates x5 Street Hub units (which are soon to be joined by another x5 Street Hub units), the existing estate within the Local Authority area already contributes to the data outlined above in terms of interacting with, and usage of, the Applicant's units.

From a safeguarding perspective, a significant number of calls were made to Charity phone lines. This is considered to be a very important social factor.

The proposed development is therefore a real opportunity for the Local Authority to provide 'free' digital services across their jurisdiction, to residents, businesses and visitors alike, adding to those units which they have already been deemed acceptable and are already providing public benefits. Additionally, the conversion of this ST6 Unit to a Street Hub 3 Unit essentially replaces an under-used and now out-dated 'unit' with a more modern one, on a smaller footprint within the streetscene. This demonstrates the natural evolution of the BT street furniture estate, and, in time, traditional telephone kiosks, such as the one at the application site, will be completely removed from the streetscene, and replaced with more modern 'units', like the one proposed. The introduction of two digital display screens is integral to the street transformation project and the provision of these vital, and much sought after, free services. Without the screens, which fund the free services, these services cannot flow into the local area.

The existing ST6 advertising screen is larger than those proposed as part of the upgrade. This is a material planning consideration.

It is considered that footway width would be improved as a consequence of this upgrade, as the Street Hub 3 Unit measures smaller in terms of both width and depth dimensions. This will be discussed below. As such, the Applicant submits that the upgrading of this unit will lead to no significant or unacceptable impact on pedestrian flow, public safety, or amenity within the immediate area. The submitted planning drawings demonstrate that 4200mm of pedestrian passing space will be retained at the application site, post-upgrade.

The introduction of any form of development within a particular environment will always be, to some degree, a noticeable addition or change for those residents, businesses and regular passers-by found closest. However, being able to see something should not immediately infer that is causes harm. The

Applicant encourages the Local Authority to make a clear distinction between 'visibility' and 'harm', when assessing the visual impact of Unit on the surrounding area, giving particular regard to the units which have been deployed here for at least 18 years.

Whilst the Applicant accepts that the proposed unit will be visible, this does not immediately infer that it is inappropriate for this setting – given that at least one 'unit' has been in situ for at least 18 years. The existing unit sits amongst an array of other street furniture, and both the existing unit, and the proposed replacement unit, are considered wholly acceptable for this location, given the surrounding commercial context of High Street and the existing digital street furniture deployed nearby (i.e. the New World Payphone kiosk and the TfL bus shelter)..

In regard to all of the above, the planning assessment which the Local Authority must undertake is very clear – is the deployment of a replacement the Street Hub 3, appropriate and acceptable within the streetscene? As part of this balanced assessment, planning weight must also be given to the fact that the proposed unit sits on a smaller footprint than the existing unit, which can only be considered advantageous, as it returns more pedestrian footway to public use. The Applicant submits that the provision of free digital services to the surrounding area weighs in favour of a planning approval, and that there are no exceptional circumstances where this would not be the case.

The deployment of a Street Hub 3 at this location, will assist in future-proofing the high street, making it smarter, safer and more sustainable. The siting of the Unit, therefore, is considered wholly appropriate for the streetscene and accords with both local and national planning policy.

The proposed Street Hub 3 will be operated in accordance with levels of illumination as set out in the Institute of Lighting Professional's *'Professional Lighting Guide 05/23: The Brightness of Illuminated Advertisements including Digital Displays*'

Pavement Width

The total existing pavement width at this location is over 6m. The total width of the BT Street Hub 3 is 1236mm.

The proposed BT Street Hub 3 will still allow for safe circulation space around the unit and will not restrict passing pedestrians' movements. For the avoidance of doubt, 4.2m of footway will **remain** to allow pedestrians to pass-by. It should be noted that, given the Street Hub 3's depth (350mm) and width (1236), the proposed unit will return more pedestrian space to public use, as the proposed Unit is less-wide and less-deep than the one it is designed to replace.

The Department for Transport's guidance document, 'Inclusive Mobility' (December 2021), outlines the appropriate levels of pedestrian footway. Paragraph 4.2 is particularly important:

4.2 Width and height clearance

Footways and footpaths should be made as wide as is practicable, but under normal circumstances, a width of **2000mm** is the minimum that should be provided, as this allows enough space for two wheelchair users to pass, even if they are using larger electric mobility scooters. If this is not feasible due to physical constraints, then a minimum width of **1500mm** could be regarded as the minimum acceptable under most circumstances, as this should enable a wheelchair user and a walker to pass each other. Where there is an obstacle, such as lamp columns, sign posts or electric vehicle charging points, the absolute minimum width should be **1000mm**, but the maximum length of such a restricted space should be **6 metres**.

As per the Department for Transport's own guidance, 2000mm is the desirable level – enough for two wheelchair users to pass. As demonstrated within our submitted planning drawings, 4200mm of pedestrian footway will be maintained at this location, comfortably meeting the upper threshold outlined by the Department for Transport.

When a balanced assessment, as advocated within the NPPF, is undertaken, the scheme is considered to find in favour.

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 proposed BT Street Hub is to be located, and the orientation of the advertisement screens, in relation to the road, does not cause unacceptable interference with nearby road signs and/or navigational lights. It is submitted that the presence of LED advertising screens will result in no additional interference with nearby road signs, navigational lights, passing pedestrians or motorists.

The Applicant wishes to reiterate that over 1000 BT Units – consisting of 500 first-generation InLink Units and 500 second-generation Street Hub Units – are now deployed across the whole of the UK. The

majority of these Units sit within similar settings as the appeal scheme; i.e. busy suburban streetscenes and within close proximity to roadsides. The Street Hub estate is deployed in accordance with the guidelines of the Institution of Lighting Professionals – Professional Lighting Guide 05-23, which has been specifically designed for roadside Digital Displays to ensure that they **do not** become driver distractions.

With regards pedestrian safety, the BT Street Hub will be positioned on the same footprint as the ST6 unit. Given the replacement unit is smaller in both width and depth , it is not considered that it will have any negative impact on pedestrian movement or desire lines.

Transport for London's (TfL) policy document 'Guidance for Digital Roadside Advertising and Proposed Best Practice – 2013' [the TfL Guidance] is a key document in relation to the proposed development. The proposed BT Street Hub 3 Unit 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 (PLG 05/23). A copy of this document is appended for clarity.

It should be noted, as outlined above, that the digital screens can be used by the Council as there is 5% free screen time allocated on each BT Street Hub unit.

The existing ST6 Unit has fallen victim to unregulated fly-posting and advertising. The removal of this Unit, and the deployment of a more modern Street Hub 3 Unit, which will be deployed in accordance with all relevant advertising guidance, can only be seen as a positive impact on the surrounding area.

Noise Management

The Street Hub 3 will follow the same noise management plan as the existing InLink. Please note: this noise management plan refers specifically to the noise from the Street Hub. Noise from pedestrians, users of the Street Hub, or from other nearby sources are not included and would typically be considered matters for the Police and other authorities who have the appropriate and relevant powers to act on such issues if necessary.

The average volume settings are 65dB average at 3m distance from each Street Hub. Users may also choose to use headphones when making calls or using the tablet, which deactivates the speaker for the duration of their use. It is worth noting that the Street Hub are situated on public streets, in the most part close to roads where high volumes of traffic will be seen, examples of background noise experienced on streets are details below:

Noise Level, dB	**Example**
60-70	Conversational Speech
70-80	Average traffic on Street Corner
80-90	Heavy lorries at 6m

Daytime (07:00 – 21:00)

Street Hub have controllable volume levels. This will default to 50% at the start of any user activity during the day and can be increased and decreased based on the preferences of the user.

Night Time (21:00 – 07:00)

Between the hours of 21:00 to 07:00 all Street Hub will be governed so that the volume cannot be increased to greater than 60% of the maximum volume.

Exceptional Circumstances

We manage noise by exception based on feedback from users and the local community. If we receive any feedback that the Street Hub may be causing detrimental environmental impact, we take the following actions:

1. Understand the reason for the issue and any extenuating circumstances. At this point we will separate out any Police or community safety matters and work directly with the relevant authorities, and support the local residents in raising these issues through official channels where appropriate.

2. We will then verify the evidence provided against the Street Hub's call history and other operational data as required. This will allow us to understand the number, time, and frequency of outbound calls being made and better understand the severity of the reported situation.

3. Once we have verified the situation, we will typically look to apply local bespoke volume governor controls appropriate to the situation. We have found that reducing the Street Hub 's maximum volume to 40% during relevant periods tends to resolve issues where they have been identified.

4. We will continue to monitor the situation and listen to ongoing feedback from the community as we do take matters seriously. We continue to learn as part of our roll out how Street Hub are fitting in to the community.

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 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. All services and functions currently provided by the InLink Unit will be carried forward and continued via the Street Hub 3.

The proposed upgrading of an existing ST6 Unit with a replacement BT Street Hub 3 is considered to be wholly appropriate from a planning perspective. The principle of the structure has been previously established due to the long-standing presence of the existing ST6 Unit and the previously-deployed legacy kiosks, with the proposal now before the Council being one of an expected nature – i.e. the upgrading of street furniture as the Applicant's portfolio continues to evolve. Ultimately, there will be **no** increase in street furniture, as this is a one-for-one swap.

We believe this statement has demonstrated that the upgrading of an ST6 unit with a BT Street Hub 3, is in full accordance with both local and national planning policy. We submit that the application warrants support and that there are no material considerations that indicate otherwise. As such, we hope that this application can be supported by your Council.

Planning Conditions

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. Pavement surrounding the Street Hub shall be made good to the same condition as the adjacent land.
B. 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 05/23: The Brightness of Illuminated Advertisements including Digital Displays'.
C. The digital display screens shall not display any moving, or apparently moving, images (including animation, flashing, scrolling three dimensional, intermittent or video elements).
D. The minimum display time for each piece of content on the digital display screens shall be 10 seconds.
E. 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.
F. No content on the digital display screens shall resemble traffic signs, as defined in section 64 of the Road Traffic Regulation Act 1984.
G. This advertisement consent shall remain valid for a period of 10 years from the date of consent.

To justify condition G. suggested above, it is recognised that advertisement consent usually lasts for 5 years, however a local planning authority has discretion on this matter and can grant consent for a longer or shorter period. Even where advertisement consent is only granted for a period of 5 years, the advert may continue to remain in place after that period without submitting any further application (under Class 14 deemed consent). After the expiry of the 5 years initial consent, the local planning authority has the power to issue a discontinuance notice on the advert if they feel that such action is necessary to remedy a substantial injury to the amenity of the locality.

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.