

Planning Department
Manchester City Council
PO Box 532
Town Hall
Manchester
M60 2LA

30th April 2021

Dear Planning,

**BT STREET HUB PROJECT
FULL PLANNING AND ADVERTISING APPLICATION
MAN031 - Whitworth Street West (OS No. 27), M1 5ND**

We write on behalf of our client, BT, following unimplemented planning applications for the installation of a BT InLink unit with digital adverts at the entitled site as well as associated BT kiosk removals. The proposed site of the BT Link has been revisited and BT are now applying for full planning permission and advertisement consent for their new unit – BT Street Hub.

To recap, the InLinkUK service was first launched in 2017 and since then 494 InLink structures were rolled out in 23 cities. These units offered 1Gbps free public Wi-Fi, free UK calls, USB charging, included 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. However, the screens can also be used to show local content free of charge.

You will be aware that some of the proposals were never fully implemented. This was due to the incumbent supplier, InLinkUK, who went into administration no longer being able to supply units to BT, hence this product is no longer available. Since then, BT have been working over the last 18 months on a new and improved unit, the BT Street Hub, that they are keen to rollout in your Council.

BT Street Hub Project

BT is continuing to move forward with public connectivity and Street Hubs will provide a sleek and modern answer to the demands of a digitally connected society. BT Street Hub has all the existing benefits of the previous structure but with better Wi-Fi range, air quality monitoring, insight counting and small cell 5G mobile connectivity. The addition of the 5G small cells to Street Hubs is very much in line with current UK Government's guidance on telecommunications developments and the National Infrastructure Strategy. Since the start of the original BT InLink project, the Government's commitment towards telecommunications deployment has been strengthened and NPPF 19, para 112 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)'*.

The Street Hub 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 one Street Hub at a time, and therefore decluttering these environments

with the associated removal of existing BT phone boxes. Due to the increased functionality of the new Street Hub, a slightly larger structure than the one that was originally proposed unit is required. We have appended some imagery of the new structure, which is 34cm longer than the original unit, but only 7cm wider and 8.5cm taller.

This is an application for full planning permission and consent to display advertisements, relating to the installation of 1no. BT Street Hub at the entitled address and the associated removal of 2no. BT phone boxes. It follows previous planning applications (124151/FO/2019 and 124152/AOH/2019) for a proposed 1no. BT InLink and associated removals which was withdrawn from the Council on 06/03/20.

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 £928 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 Street Hub Anti-Social Behaviour Management Plan;
- Land Remediation Statement;
- Removal Kiosk Site Plans
- '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 any associated BT phone boxes found immediately adjacent to try and encompass the removals as well. BT are a statutory undertaker on adopted highways controlled land, so we have notified the Highways Department and where applicable any registered owner(s) as part of our planning submission.

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

Lewis Baldwin

Lewis Baldwin BA, MSc

Planning and Acquisitions

Mono

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For and on behalf of BT as a duly authorised agent

Planning, Design and Access Statement

Our Ref.	MAN031
Lat/Long	53.474076, -2.2453256
Project Type	BT Street Hub
Conservation Area	Not within a Conservation Area
Statutory Listed Buildings in vicinity	Manchester South Junction and Altrincham Railway Viaduct, II (1200837)

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 one (1) BT Street Hub and removal of two (2) associated BT payphones.

Proposed Install (Site Location Photo)
Whitworth Street West (OS No. 27), M1 5ND



Proposed Removal o/s Church of the Ascension, Stretford Road, Hulme, M15 5TQ	Proposed Removal 2 Clarendon Street, on corner with Hunmanby Avenue, Hulme, M15 5AB
	

PLANNING LEGISLATION & POLICY

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 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

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 109 - 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 110 - 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 112 - 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 113 - 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 115 - 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 116 - 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:

Paragraph 132 - 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.

Local Plan Policy

Core Strategy (2012)

The primary planning policy context at a local level is the Core Strategy which was adopted by Manchester City Council on 11th July 2012. It is the key document in Manchester's Local Development Framework and covers a period of 15 years from 2012 to 2027. Proportionate and where deemed applicable to the site and proposal subject to this application, it is considered that the main planning policy context taken from the Core Strategy that is applicable to this case are stated as follows: -

Policy SP1 - Spatial Principles

The key spatial principles which will guide the strategic development of Manchester to 2027 are:

- The Regional Centre will be the focus for economic and commercial development, retail, leisure and cultural activity, alongside high-quality city living.
- The growth of Manchester Airport will act as a catalyst for the regional economy and will also provide the impetus for a second hub of economic activity in this part of the City.
- Beyond these areas, the emphasis is on the creation of neighbourhoods of choice, providing high quality and diverse housing around district centres which meet local needs, all in a distinct environment. The majority of new residential development in these neighbourhoods will be in the Inner Areas, defined by the North Manchester , East Manchester and Central Manchester Regeneration Areas.
- The City is covered by regeneration areas including the City Centre. All development should have regard to the character, issues and strategy for each regeneration area as described in the North, East, Central and South Manchester and Wythenshawe Strategic Regeneration Frameworks and the Manchester City Centre Strategic Plan.
- The City's network of open spaces will provide all residents with good access to recreation opportunities. The River Valleys (the Irk, Medlock and Mersey) and City Parks are particularly important, and access to these resources will be improved.
- New development will maximise the potential of the City's transport infrastructure, in particular promoting walking, cycling and use of the public transport. The extension to the Metrolink network through the Oldham and Ashton lines will create key corridors for new development.

Core Development Principles

Development in all parts of the City should:-

- Make a positive contribution to neighbourhoods of choice including:-
 - creating well designed places that enhance or create character.
 - making a positive contribution to the health, safety and wellbeing of residents
 - considering the needs of all members of the community regardless of age, gender, disability, sexuality, religion, culture, ethnicity or income.
 - protect and enhance the built and natural environment.
 - Minimise emissions, ensure efficient use of natural resources and reuse previously developed land wherever possible.
 - Improve access to jobs, services, education and open space by being located to reduce the need to travel and provide good access to sustainable transport provision.

Policy DM 1 - Development Management

All development should have regard to the following specific issues for which more detailed guidance may be given within a supplementary planning document:-

- Appropriate siting, layout, scale, form, massing, materials and detail.
- Impact on the surrounding areas in terms of the design, scale and appearance of the proposed development. Development should have regard to the character of the surrounding area.
- Effects on amenity, including privacy, light, noise, vibration, air quality, odours, litter, vermin, birds, road safety and traffic generation. This could also include proposals which would be sensitive to existing environmental conditions, such as noise.
- Accessibility: buildings and neighbourhoods fully accessible to disabled people, access to new development by sustainable transport modes.
- Community safety and crime prevention.
- Design for health.
- Adequacy of internal accommodation and external amenity space.
- Refuse storage and collection.
- Vehicular access and car parking.
- Effects relating to biodiversity, landscape, archaeological or built heritage.
- Green Infrastructure including open space, both public and private. The use of alternatives to peat-based products in landscaping/gardens within development schemes.
- Flood risk and drainage.
- Existing or proposed hazardous installations.
- Subject to scheme viability, developers will be required to demonstrate that new development incorporates sustainable construction techniques as follows (In terms of energy targets this policy should be read alongside policy EN6 and the higher target will apply):
 - a) For new residential development meet as a minimum the following Code for Sustainable Homes standards. This will apply until a higher national standard is required: Year 2010 – Code Level 3; Year 2013 - Code Level 4; Year 2016 - Code Level 6; and
 - (b) For new commercial developments to demonstrate best practice which will include the application of the BREEAM (Building Research Establishment Environmental Assessment Method) standards. By 2019 provisions similar to the Code for Sustainable Homes will also apply to all new non-domestic buildings.

This case has also been considered against Spatial Objective 2 – Economy and City Centre and the broad principle of the policies contained within this section. Furthermore, the general principle as set out in City Centre Policy CC1 - Primary Economic Development Focus : City Centre and Fringe, City Centre Policy CC4 - Visitors - Tourism, Culture and Leisure and City Centre Policy CC9 - Design and Heritage have been taken into account when progressing this application.

Manchester Unitary Development Plan (1995) Saved Policies

It is recognised that the Core Strategy replaced much of the UDP but some UDP policies are extant and so remain applicable as follows proportionate to this form or development.

15 - Advertisements, Hoardings and Posters

“DC15.1 The Advertisement Regulations require that applications for advertisements be considered only in the interests of amenity and public safety. In determining applications for free standing hoardings and wall mounted posters the Council will take account of the following matters in assessing these interests: a. the general location of the proposed development and the effect on visual amenity; b. the scope for posters and hoardings to make a positive contribution to the locality; c. the design of the structures, and the relationship with any premises on which they are located; d. the effect of the proposal on permanent redevelopment of the land; e. public safety resulting from the positioning of the design of the display; f. the ease with which the structure is capable of being satisfactorily maintained; g. the use of hoardings to screen vacant sites or buildings during development, or where development is known to be imminent; h. the use of hoardings as part of a scheme to prevent access by unauthorised users onto land pending development; i. the use of hoardings to disguise or improve the appearance of unsightly features, operations or activities; j. the number of advertisements in the locality and their cumulative effect on visual amenity.

DC15.2 In assessing the interests of amenity and safety the Council will take account of the following criteria: a. developments of this kind should not harm the character or architectural features of a building, nor interfere with its proper use; b. they should be in scale with the locality and relate properly to the site on which they stand; c. they should be unobtrusive and should not intrude into residential neighbourhoods and areas of high amenity value; d. a proposal which would be injurious to public safety or adversely affect the flow of traffic, by reason of its position, size, or design will not be permitted.

DC15.3 Where, having regard to the preceding policies, the Council considers the proposed development to be acceptable in principle, conditions may be imposed in order to protect safety and amenity.”

17 - Telecommunications

DC17.1 Applications for telecommunications developments will normally be approved if the Council can be satisfied that the development has been sited and designed to minimise its impact on residential amenity and in environmentally sensitive areas. Wherever possible, the Council will expect the potential of existing buildings and masts, including the sharing of such facilities, to be fully explored before agreeing to additional separate development.

19 - Listed Buildings

DC19.1 In determining applications for listed building consent or planning applications for development involving or having an impact on buildings of Special Architectural or Historic Interest, the Council will have regard to the desirability of securing the retention, restoration, maintenance and continued use of such buildings and to protecting their general setting. In giving effect to this policy, the Council will:

- a. not grant Listed building consent for the demolition of a listed building other than in the most exceptional circumstances, and in any case, not unless it is satisfied that every possible effort has been made to continue the present use or to find a suitable alternative use;

- b. not permit a change of use of a listed building, where it would have a detrimental effect on the character or appearance of the building;
- c. not permit any external or internal alteration or addition to a Listed building where, in its opinion, there would be an adverse effect on its architectural or historic character;
- d. seek to preserve and enhance the settings of listed buildings by appropriate control over the design of new development in their vicinity, control over the use of adjacent land, and where appropriate, by the preservation of trees and landscape features;
- e. permit demolition only where there are approved detailed plans for redevelopment and where there is evidence of a firm building contract;
- f. not permit alterations to a listed building which would prevent the future use of any part of the building, in particular upper floors or basements, or where poor maintenance is likely to result.

Planning History to the Site

We made pre-application contact with Christopher Smith, Assistant Planning Officer at Manchester City Council regarding a number of InLink sites in September 2018. In an email dated 17th May 2019, he reviewed each of these sites and stated that they all looked to be '*broadly acceptable*'. This particular application was withdrawn in March 2020 (124151/FO/2019 and 124152/AOH/2019) with conditions attached following the demise of InLinkUK. More recently, we then wrote to your Council in January 2021 to introduce and explain the new BT Street Hub project. We consider that the precedent for this development has been set by the original discussions with the LPA on planning and advertisement at this location in 2019 for an albeit slightly smaller structure.

Matters considered in the original site identification were the preference on locations with wide pavements, and an InLink's relationship with existing street furniture, so as to avoid undue proliferation and clutter wherever possible. It should be recognised that BT's legacy estate of payphones has grown organically over the years, in which their whereabouts can now sit in environments that have changed dramatically around them amidst an ever evolving society with 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, although there was an appreciation by all that the use of phone boxes has dramatically decreased since kiosks were first conceived but obviously WI-FI and mobile coverage has increased massively.

In this instance, the previously discussed InLink and position of the proposed Street Hub does not sit upon the exact footprint of an existing BT kiosk. This is because in replacing the existing BT phone booths, it was felt to be an inappropriate location for an InLink so BT have used this as an opportunity declutter and in turn sought to identify a more suitable position elsewhere. This is echoed in the fact that the LPA had no concerns for full planning and advertisement consent for an InLink unit here in 2019.

Siting Justification against Planning Policy

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, the change in form of something that has an established presence on-site, or indeed the differences between a InLink or 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 improve the street scene and meet the communication needs of today's society.

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 siting of the previously discussed InLink, 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 approved InLink 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

From the outset it is a material planning consideration to consider that this case derives from unimplemented planning applications (124151/FO/2019 and 124152/AOH/2019) for BTs predecessor unit and associated removal of BT phone booths. 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.

Whitworth Street West is a busy highway for both vehicular and pedestrian traffic. The street scene context immediate to the proposed Street Hub site comprises a mix of uses including residential properties, office buildings and restaurants. In the immediate vicinity of the proposed Street Hub site there is existing street furniture including road signage, street lights and litter bins. Viewed within this street scene context, it is considered that the siting of the proposed Street Hub is appropriate.

The proposed Street Hub site is located on Whitworth Street West. The application site is not found within a Conservation Area however, it is within approximately 30 metres from Manchester South Junction and Altrincham Railway Viaduct which is a Grade II Listed Building.

Clearly there will always be challenges faced in finding a balance between limiting any visual harm created by the siting of development upon heritage assets when weighed up against the public benefits it will bring to the area. When seen in perspective within the street scene, the proposed siting and orientation of the Street Hub it not considered to have a significant material impact on the setting or

views of the aforementioned Listed Building. Indeed, it is considered that any harm upon heritage assets would be outweighed by the removal of the existing call boxes and the public benefits of the Street Hub proposal.

Despite its modern appearance, the Street Hub unit is of a very simple, unfussy design which we believe is a significant visual improvement from that of the existing situation. The siting of the proposed Street Hub will not appear incongruous within this vibrant part of Manchester given the modern commercial/retail frontages and street furniture found along this stretch of Whitworth Street West.

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. This is endorsed by the fact that there were previous, positive discussions at the pre-application stage with the LPA for the siting of an InLink unit here. In this respect as the proposed Street Hub is only slightly different in its dimensions when compared to the old InLink unit, it is considered to create no material conflict with the assessment previously made by the LPA.

Appearance

The proposed Street Hub unit is an advanced, modern development which has been designed following significant improvements in technology and digital content over recent years. It has the ability to 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 so as to ensure that it is accessible to all users.

The appearance of the 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 and given 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 Street Hub.

The structure will be set within a generally commercial/residential 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 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 street lights, window display, other advertisements and bus shelters containing advertisement panels. In this context, the Street Hub design would not appear detrimental to the amenity of Whitworth Street West or the setting of 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. Again, this is confirmed by the fact that the LPA held positive discussions with us over the proposed introduction of an InLink unit here. In this respect as the

appearance of the proposed Street Hub is very similar when compared to the old InLink unit, it is considered that the LPAs previous assessment should carry weight when determining this latest case.

Pavement Width

The total existing pavement width at this location is approximately 4300mm. The total width of the Street Hub is 1236mm (tapering down to a footprint width of 1201mm on the pavement). With the Street Hub being located at a distance of 450mm off the kerb, the remaining footway of 2688mm 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 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 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 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 to pedestrian safety, the Street Hub by reason of its position away from the road edge on a wide section of pavement would not impede pedestrian movements as ample footway width would be retained. Allowing for the orientation of the 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 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.

With regards the digital screens, it is clear that as the LPA have held positive discussions regarding the installation of an InLink unit here in the past that advertisements is deemed acceptable in this location.

In this respect as the proposed screens on each side of the Street Hub take the same orientations as the old InLink unit, it is considered that the LPAs previous assessment is still applicable in this latest case.

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 course of the determination process.

Conclusion

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.

The proposed 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 proposed structure to be appropriately sited; to reduce street clutter, to improve available footway widths in the locality and not to negatively affect heritage assets or adversely affect amenity or public safety. Precedence has been set by the approved InLink units thus given the similarities when compared

to the siting, appearance and advertisements of a Street Hub, this latest submission is deemed acceptable.

We believe this statement has demonstrated that the 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.