Planning Supporting Statement

Our Ref.	DID-102
Street Hub Address	Footpath outside, No. 720 Wilmslow Rd, Didsbury, Manchester
Postcode	M20 2DW
National Grid Reference	E:384699 N:391179
Project Type	Relocation
Conservation Area	Not within Conservation Area
Statutory Listed Buildings	Not nearby any listed buildings

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Rev	Originator	Approved	Date
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1.0 Introduction

1.1 Overview

This Supporting Statement has been prepared by Telent on behalf of BT Group plc. The statement has been prepared in support of the planning application made to the Council for the installation of a 'Street Hub' and 2No. digital illuminated screens (one to each side of the unit) at the footpath outside No. 720 Wilmslow Rd, Didsbury, Manchester (E:384699 N:391179). This application is made under the Town and Country Planning (Development Management Procedure) (England) Regulations 2015 and express advertisement consent under the Town and Country Planning (Control of Advertisement (England) Regulations 2007. The right to install, operate and maintain communication apparatus is granted through Section 106 of the Communication Act 2003, due to BT's right as a Code System Operator.

Considerations of design and layout are informed by the context, having regard not just to any immediate neighbouring buildings but the immediate and wider townscape. The local pattern of streets and spaces, building traditions and materials all help to determine the character and identity of the development.

This planning statement is accompanied by the following supporting documents:

- Supporting Planning Drawings;
- Product Statement prepared by *BT Group;*
- Unit Dimensions prepared by *BT Group;*
- Anti-Social Behaviour Management Plan prepared by *BT Group;*
- Professional Lighting Guide prepared by *Institution of Lighting Professionals (ILP).*

1.2 Purpose of Street Hubs

2021 marked the 100th anniversary of the original K1 kiosk. Public connectivity moved on with the deployment of InLink units first launched in 2017, and now, BT are further updating and evolving the payphone estate to better serve todays digitally connected converged-media society through the new improved BT Street Hub.



In 2017, BT started working as part of an exclusive partnership with InLinkUK to ensure communities in urban areas throughout the United Kingdom are well-served in the digital age through the roll out of 'InLink' units. These were developed and deployed to replace and rationalize the existing network of payphones. A total of 494 InLink structures were rolled out in 23 cities throughout the U.K. offering 1Gbps free public Wi-Fi, free UK calls, USB charging, an emergency services button and a range of other digital services for those in the vicinity. HD displays on each side of the unit are used to carry advertising, which helped to fund the units, but the screens also allow Councils 5% of free screen time on each Street Hub unit annually to promote and educate, equivalent to 876 hours per unit or 438 hours per screen. This content would be scheduled and (where needed) developed in partnership with BT and Global, and can tell residents and visitors about local services, local events and news, as well as warnings and public notices.

Through collaboration with councils, BT helped in creating a service that revolutionized streetscapes and helped in providing a connected city solution that delivers the fastest and most robust free public Wi-Fi service in the UK. Councils across the UK have used the InLink units to meet key challenges head-on, upgrading local infrastructure, tackling the digital divide, and freeing the high street from unnecessary furniture.

Unfortunately, InLinkUK (who were supplying the units to BT within the partnership) went into administration in 2019, and, as such, the InLink product is no longer available. Since then, BT have been working on a new and improved unit - the 'Street Hub'. The Street Hub has all the existing benefits of the previous InLink unit, but has improved Wi-Fi range, environmental sensors, insight counting and small cell mobile connectivity. This addition of the 5G small cells to Street Hubs is very much in line with current UK Government's guidance on communications infrastructure and the National Infrastructure Strategy. Consequently, when installed, residents, local businesses and visitors will get a faster, more reliable connection for calls and internet access.

BT are continuing to push public connectivity forward with the move to Street Hubs – a sleek, modern answer to the demands of a digitally connected, converged-media society. To this end, BT have made great progress so far, with over 950 Street Hub units live across the UK. Local Authorities across the country use Streets Hubs to meet key challenges head-on such as upgrading local infrastructure, tackling the digital divide, and freeing the high street from unnecessary furniture.

With Street Hubs, BT are further transforming the payphone estate by making streets smarter, with ultrafast Wi-Fi, public messaging, and better mobile connectivity. We are making them safer with ready emergency services. Furthermore, BT are making them more sustainable, with sensors allowing for 'smart city' planning and reduced street clutter.

These new units will be monitored 24/7, with weekly inspections and a minimum of bi-weekly cleaning services to keep the unit to a high standard of finish within the existing streetscape. All units will be fitted with a direct 999 call button to aid in the efficiency of operations of the emergency services, with emergency (i.e., Police) awareness

messaging shown via their advertising screens on either side of the unit. Furthermore, Street Hubs are powered by 100% renewable carbon-free energy, making them sustainable and durable for years to come.

In 2021, former BT head of street, James Browne, said:

> *"Street Hubs form part of BT's plan to transform the UK's streets with a digital communications service designed for the 21st Century.*
>
> *I'm really excited that we're now evolving the service even further with a newly designed Street Hub 2.0 unit which is more sustainable while delivering free public Wi-fi services and improved 4G/5G mobile coverage to local communities.*
>
> *The free digital services provided by our Street Hub units can play an important role in helping to revive the UK's high streets following the pandemic.*
>
> *We are working closely with local councils and communities to introduce the new units to more parts of the country, enhancing the UK's future digital infrastructure, and bringing benefits to residents, businesses and tourists alike."*

1.3 The Importance of Mobile Connectivity

The ability to access mobile data and voice services is an integral part of modern life. Mobile devices are relied upon by consumers and businesses. Mobile connectivity is no longer seen as a luxury: the ability to make calls, access the internet and receive e-mail and text is seen as a necessity. Businesses, large and small, need mobile connectivity to operate effectively and to compete in an increasingly global market. In an emergency, the public rely upon mobile devices to call for help and the emergency services rely upon mobile services to respond.

1.4 UK Government Policy on Mobile Infrastructure Deployment

The UK government has identified the need for greater investment in mobile infrastructure to increase the widespread availability and capacity of mobile voice and data networks.

"The Government acknowledges that there has been a profound shift over the last decade in the way citizens approach and access digital communications. What was once seen as a luxury is now a basic need, and people expect to have access to fast broadband at home, irrespective of where they live, and use their mobile devices anywhere they go". DCMS, May 2016.

The last few years have seen a number of UK-wide initiatives to improve coverage including:

- Coverage commitments in the 4G LTE spectrum awarded to Telefonica O_2 (February 2013) to deliver mobile broadband with 98% indoor premises coverage by the end of 2017
- National commitment by all four MNOs (December 2014) to deliver 90% geographic coverage by 2017

- Mobile Infrastructure Project (MIP) – investment by DCMS of up to £150m (to March 2016) in towers to deliver connectivity in complete mobile not-spots.
- Changes to the Permitted Development rights afforded to communications code operators (such as WIG) to allow new networks to be rolled-out more efficiently.
- Changes to the Electronic Communications to Code (December 2017) to allow mobile operators to more easily roll-out new communications infrastructure.

Digital connectivity in 2024 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.

1.5 National Support for Modern Communications

There is significant UK Government support for the delivery of 5G, particularly as this new connectivity will be a step change from earlier generations of mobile connectivity and will be critical to economic growth and sustainable communities. In the coming years, 5G mobile connectivity will underpin the UK Digital Economy and bring significant social, economic and sustainability benefits of advanced modern connectivity. It is essential that the planning system looks to support and facilitate 5G infrastructure improvements, such as the small cell capability of Street Hubs, to meet the Government's Digital Strategy. In addition, modern connectivity, such as 5G, will be essential to help the Government meet its wider sustainability and climate change targets.

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 the 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. The 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.

2.0 Proposed Development

2.1 Site and Proposed Development

The application site comprises a section of pedestrian footpath outside No. 720 Wilmslow Rd, Didsbury, Manchester. This application seeks approval to relocate and upgrade 1No. BT phone box existing south of the site by replacing it with a single Street Hub unit at the proposed location.

The proposed site is located within a commercial precinct characterised by two to three storey commercial developments along both the east and west sides of Wilmslow Road. The area primarily consists of uses including retail and food and drink premises. Within the immediate area footpaths are occupied by existing street furniture and infrastructure, including lamp posts, public bins, bicycle hoops, and landscaping.

The area's advertising theme includes ground-level fascia signs, including illuminated advertising, associated with shopfronts. Additionally, billboard advertising is present, notably on the building at the corner of Whitechapel Street and Wilmslow Road, south of the site.

As mentioned, the proposal includes the removal of the 1No. existing BT phone boxes located south of the site on the footpath outside No. 743 Wilmslow Rd, Didsbury, Manchester. The removal of this phone box will assist in the decluttering of footpaths in the wider area and enhance the broader area's visual amenity. Details of the kiosk proposed to be removed is provided in the table below.

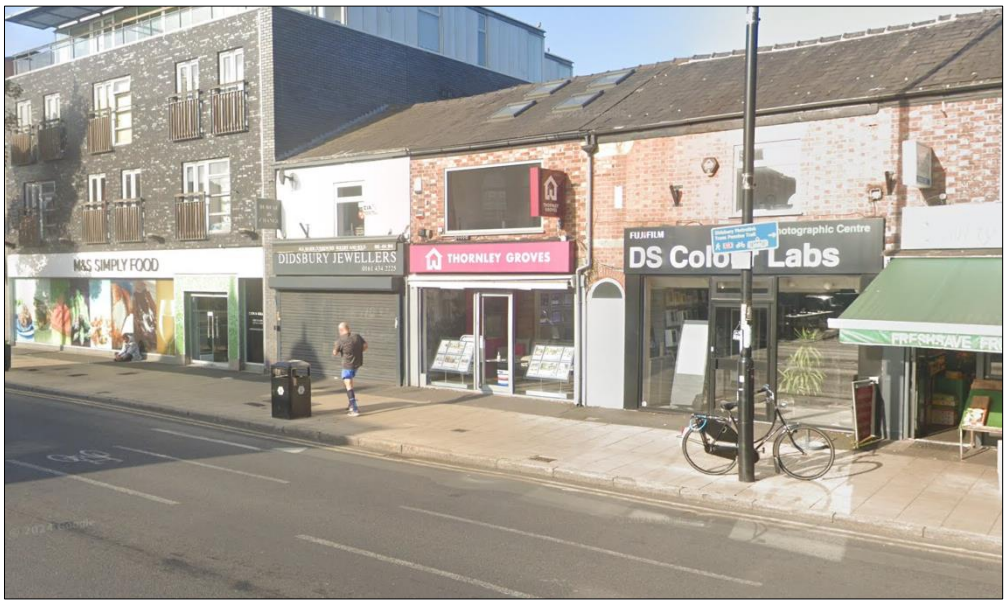
Proposed Kiosk Removal
Footpath opposite, No. 743 Wilmslow Rd, Didsbury, Manchester


The site location is shown on the image below.



Aerial view of site

The below image, sourced from the Google Street View, shows the street view context and general location of the proposed Street Hub.



Street view of site

The proposal would see the installation of a single Street Hub unit to be located on the section of footpath outside No. 720 Wilmslow Rd, Didsbury, Manchester M20 2DW (E:384699 N:391179). This forms part of a strategic package of applications submitted to Manchester City Council, containing 20No. Street Hubs located within existing streetscapes in the Council area. It should be noted that these proposals for the installation of a total of 20No. Street Hubs will see with it the removal of existing, outdated and worn-down BT payphones, at no extra cost to the council. This would

help in achieving the advancement and decluttering of the council's streetscapes, in line with the UK Digital Strategy, the National Planning Policy Framework, and the relevant Development Plan for the area.

2.2 Street Hub Design and Dimensions

Street Hubs are free-standing structures featuring a fully accessible tablet interface and digital HD display screens on two sides. Overall, Street Hub dimensions are 35cm deep and 123.6cm wide and a height of 298.6cm to maximize the Wi-Fi range without dominating the street. A narrow base limits the footprint while ensuring access to wheelchair users.

Street Hubs have been designed to be accessible to all users, regardless of their physical or technological capabilities. Street Hubs are free to use, fully accessible community assets connecting and improving local streets in urban areas. At no cost to taxpayers or end users, Street Hubs provide communities with an unprecedented suite of essential urban tools including:

- Ultrafast public and encrypted Wi-Fi
- Powered by 100% renewable carbon-free energy
- Inspected weekly and cleaned at least every two weeks, monitored 24/7
- Free phone calls
- Display community and emergency (i.e. police) awareness messaging
- Ability to house IoT sensors such as air quality, traffic etc.

The Street Hub unit will be funded through the display of advertising in conjunction with other council and community content, via sponsorship from companies who will utilize the digital HD display screens on both sides of the unit. The two screens automatically dim at night to 600cd/m2, following daylight hours and in accordance with the levels set for this type and size of screen (those under 10m) by the Institute of Lighting Professionals, Professional Lighting Guide 05 2015: The Brightness of Illuminated Advertisements - minimizing disturbances to residents in the evening.

The screens will display content at 10-second intervals, in the form of both the commercial content that funds the service, as well as a wide range of local community and council content. As such, the proposed Street Hub will provide 876 hours of free council advertising per year with the opportunity for discounted advertising for local business groups (such as BIDs and Chambers of Commerce) and their members through BT's Street Hub Partners Program.

This sponsorship will also cover the maintenance and servicing costs of the Street Hub. This is necessary to ensure the program remains financially sustainable. Displayed advertisements will comply with all advertising regulations and guidelines. Further detail is provided in the attached Street Hub Product Statement and associated documents.

Moreover, all Street Hubs are powered by 100% renewable carbon-free energy, with energy efficiency prioritized throughout the design process. This is most evident in the following features:

- A state-of-the-art LED-backlit LCD screen that consumes approximately 60% less power than Cold Cathode Fluorescent Tubes
- Screen filters reflect light reducing the need for high power, noisy cooling systems typically seen in competing solutions
- Industrial-grade components designed to function at high temperatures lower the need for cooling without compromising performance
- Passive design for cooling, i.e. aluminium casing for better thermal dissipation
- High-efficiency power supplies providing 80% or better efficiency, compared to 65-70% of typical components.
- Noise from cabinet and equipment should not exceed: 41dB at a distance of 3 metres during day, 35 dB at a distance of 3 metres during night, Operational volume should not exceed 60dB at a distance of 1 metre.

2.3 Application History

Having checked the Councils online planning search, there is no relevant history relating to the proposed site.

Additionally, there is no recent history within the past 7 years of reference within the general locale.

2.4 Manchester City Council Rollout and Pre-application

This application is part of a wider scheme of Street Hub deployment across Manchester. As stated previously, a total of 20No. locations have been identified for the installation of a Street Hub throughout the city.

Initial pre-application consultation was sought with Manchester City Council and a formal response was received from Council in February 2025. In terms of the proposed site to which this application relates, the following advice was provided;

> *Pavement not wide enough to support a structure here – Didsbury village district centre receives high volume of pedestrians.*

Further assessment in respect of Council's comments can be found within section 3.3 of the report.

In terms of roll-out, where possible and practicable, it is proposed to install Street Hubs either as a direct replacement for existing BT payphones, or in very close proximity to such payphones. As these existing payphones will be removed it should minimise impact on existing streetscenes by reducing street clutter, or at least not adding to it at particular locations. Whereby a new Street Hub is proposed, BT payphones will be removed, again where possible and practicable from the same streetscape, or same

visual envelope, again to try to minimise impact on visual clutter. All of the proposed Street Hubs directly replace, or are very close to, existing payphones for removal. The proposed Street Hub's will help to deliver a comprehensive network of connectivity within the Council whilst decluttering the streetscene.

3.0 Planning Policy

This section sets out the most relevant national and local planning policy concerning the proposed development.

3.1 National Planning Policy and Guidance

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

The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (as amended) set out the Government's advertisement control planning policies for England and how these are expected to be applied and is considered to be a material consideration for the Express Advertisement Consent application. The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (as amended) state the following specifically in relation to advertisement control:

PART I – Section 3

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 Policy Framework (December 2024)

Planning policy is provided at the national level by the National Planning Policy Framework (NPPF). It is a material consideration in planning decisions. The NPPF is pro – development with a 'presumption in favour of sustainable development' seen as a golden thread, running through both plan making and decision taking'. The thrust of this guidance is positive and a reminder to LPAs that we need to build the requisite infrastructure to enable economic growth.

In this regard the Framework can be summarised as follows:

- Government policy is to support high quality communications infrastructure and systems as essential for sustainable economic growth;

- Government policy is to keep the inevitable environmental impact associated with electronic communications development to a minimum;

- The best way to minimise environmental impact is to avoid the unnecessary proliferation of new radio masts and sites;

- The starting point for planning new networks or the expansion of existing networks is therefore to use existing electronic communications sites as and when applicable;

- The emphasis on minimising environmental impact is greater per the sensitivity of the site. The emphasis on exploring and utilising site sharing opportunities is consequently higher in these circumstances;

- Best practice encourages a consultative approach and one that seeks to minimise potential visual impact and

- Great weight should be given to conserving landscape and scenic beauty in certain specified designated landscapes, e.g. National Parks, Areas of Outstanding Natural Beauty, Conservation Areas, etc.;

The NPPF as a whole is aimed at encouraging a more positive approach to town planning. While the NPPF builds environmental protection into the definition of sustainable development, there is also a very clear emphasis that local planning authorities should be looking for ways to help development come forward and not reject applications simply on environmental grounds. This is emphasised in paragraph 10 of the NPPF, which states that in order that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development. The NPPF recognises that this is especially relevant where a development might have other significantly important benefits such as being essential to meet, for example, enhancement and improvement to existing communications infrastructure.

Paragraph 11 of the NPPF state that for 'decision-making', the presumption in favour of sustainable development means approving development proposals that accord with an up-to-date development plan without delay; or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. *the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*

ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

As such, development proposals that accord with the provisions of the Development Plan should be approved without delay. In respect of this guidance, the following sections of this statement demonstrate that the proposed development accords fully will all relevant Development Plan and NPPF policies and, therefore, permission should be granted for the development.

The importance of the proposed development in providing the upgrading and enhancement of the existing public phone kiosk network is clearly an important material planning consideration as it directly supports sustainability and is also precisely the type of new digital infrastructure that the NPPF is seeking to support. The development proposed is comparatively small scale, sited where such forms of development are now established part of street scenes throughout the country, designed in a way that is predominately consistent with the existing infrastructure setup and so should be acceptable in every respect.

However, for completeness we still highlight some of the key points within the NPPF as they help demonstrate why the application should be permitted:

Paragraph 7 advises that the purpose of the planning system is to contribute to the achievement of sustainable development. It then states that: "*At a very high level, the objective of sustainable development can be summarised as meeting the needs of the*

present without compromising the ability of future generations to meet their own needs." [our emphasis];

Paragraph 20 advises that strategic policies should "*make sufficient provision for…….telecommunications" and that it should "be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices and to enable a rapid response to changes in economic circumstances*" (paragraph 86).

Paragraph 38, on "decision-making" states that authorities should "*work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible*".

The NPPF builds on the aspiration to build a strong, competitive economy. Paragraph 85 states: *'Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking in to account both local business needs and wider opportunities for development. The approach taken, should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation*….'

As highlighted previously, the NPPF directly addresses the need for enhanced wireless communication services, first mentioned in paragraph 20, which states that an LPA's strategic policies must make sufficient provision for:

"b) *infrastructure for transport, telecommunications (our emphasis), security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)"*

Leading on from this, paragraph 119 states 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) 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……*". This wording echoes guidance set out in previous version of NPPF and emphasises the importance of reliable communications infrastructure for both economic growth and social well-being.

While supported, paragraph 120 of the NPPF retains the requirement to minimise the number of installations consistent with the efficient operation of the network but also includes being consistent with the needs of consumers and providing reasonable capacity for future expansion.

Paragraph 123 retains the guidance set out in previous versions of the NPPF version and states that *"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".

As can be seen from the above, the NPPF clearly acknowledges the benefits of modern electronic communications and seeks to encourage such development as being essential due to their role in supporting a modern economy, contributing to sustainable objectives, and enhancing local community access to a range of goods and services. Local planning authorities are advised to respond positively to proposals for electronic communications development and this must include an understanding of the associated special problems and technical needs of developing and upgrading communications networks.

Public benefits are defined within the NPPF and could be anything that delivers economic, social or environmental progress. Benefits do not always have to be visible or accessible to the public in order to be genuine public benefits.

In addition to the above, paragraph 141 highlights that "*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".*

In the case of this proposal site, the installation of the Street Hub unit would provide a modern, multifunctional alternative to the traditional 'mast' that would act as a communication hub within a dense urban area, while ensuring that the character of the area is not significantly adversely impacted upon in respect of matters relating to amenity and public safety.

Planning Practice Guidance

Specific guidance relating to advertising developments and on the interpretation of the Regulations is contained within the **Communities and Local Government Planning Practice Guidance** ("PPG"), which contains the current guidance on this subject. Section 8 of the PPG explains in greater detail the criteria for considering amenity issues in advertising proposals. More specifically, on the matter of scale the guidance suggests that advertisements should respect the scale of the surroundings.

> *"….for example, if the locality where the advertisement is to be displayed has important scenic, historic, architectural or cultural features, the local planning authority would consider whether it is in scale and in keeping with these features."*

It further advises that; *"This might mean that a large poster-hoarding would be refused where it would dominate a group of listed buildings, but would be permitted in an industrial or commercial area of a major city (where there are large buildings and main highways) where the advertisement would not adversely affect the visual amenity of the neighbourhood of the site."*

On matters of Public Safety, the PPG states that:

> *"All advertisements are intended to attract attention but proposed advertisements at points where drivers need to take more care are more likely to affect public safety. For example, at junctions, roundabouts, pedestrian crossings, on the approach to a low bridge or level crossing or other places where local conditions present traffic hazards. There are less likely to be road safety problems if the advertisement is on a site within a commercial or industrial locality, if it is a shop fascia sign, name-board, trade or business sign, or a normal poster panel, and if the advertisement is not on the skyline."*

3.2 Development Plan Policies

Section 70 of the Town and Country Planning Act 1990, as amended, requires planning applications and appeals to be determined having regard to the provisions of the Development Plan and other material considerations, and section 38 of the Planning and Compulsory Purchase Act 2004 requires applications and appeals to be determined in accordance with the Development Plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy framework (NPPF) - among them the 'presumption in favour of sustainable development'.

For the purposes of Section 70, the current adopted Development Plan for Manchester City Council is currently made up of a suite of documents comprising the:

- Places for Everyone Joint Development Plan Document (2022 to 2039)
- Manchester's Local Development Framework Core Strategy (2012) (Amended 2024

Places for Everyone Joint Development Plan Document (2022 to 2039)
Places for Everyone Joint Development Plan Document (2022 to 2039) (PfE) is a strategic document for Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford, and Wigan Councils to improve employment opportunities for our communities, build the right homes in the right places, rejuvenate green spaces and reshape town centres. The vision of the PfE includes:

- *Our vision is to make Greater Manchester one of the best places in the world to grow up, get on and grow old:*
    - *A place where all children are given the best start in life and young people grow up inspired to exceed expectations.*
    - *A place where people are proud to live, with a decent home, a fulfilling job, and stress-free journeys the norm. But if you need a helping hand, you'll get it.*
    - *A place of ideas and invention, with a modern and productive economy that draws in investment, visitors and talent.*
    - *A place where people live healthy lives and older people are valued.*

- *A place at the forefront of action on climate change with clean air and a flourishing natural environment.*
- *A place where all voices are heard and where, working together, we can shape our future*

Relevant objectives of the PfE include the following:

Objective 5: Reduce inequalities and improve prosperity

- *Prioritise development in well-connected locations;*
- *Strengthen the competitiveness of north Greater Manchester.*

Objective 7: Playing our part in ensuring that Greater Manchester is a more resilient and carbon neutral city-region

- *Promote carbon neutrality of new development by 2028;*
- *Improve energy efficiency and the generation of renewable and low carbon energy*

Objective 9: Ensure access to physical and social infrastructure

- *Ensure that our communities and businesses are supported by infrastructure;*
- *Improve the capacity and network coverage of digital, energy, telecoms, transport and water in key growth locations;*
- *Ensure new development is properly served by physical and social infrastructure including schools, health, social care, sports and recreation facilities.*

Manchester's Core Strategy (2012) (Amended 2024)

Manchester's Local Development Framework Core Strategy (2012)(Amended 2024) (Core Strategy) outlines the Council's vision for Manchester along with the planning policies which will be used to deliver that vision. The vision for Manchester includes:

- *a successful sustainable and accessible City in the front rank of cities in Europe and the world;*
- *a City with a growing economy driven by the strength of the Regional Centre and Manchester Airport which supports a successful City Region. The knowledge based economy flourishes within an entrepreneurial community, characterised by a fully skilled, inclusive working population;*
- *meeting the challenge of climate change at the forefront of environmental initiatives and improvements and continuing to deliver sustainable development and a more effective Green Infrastructure;*
- *a City with an increased and sustainable healthy population and a community which both benefits from and drives the City's productivity upwards;*
- *a City with neighbourhoods where people choose to live all their lives because they offer a wide range of quality housing and an attractive environment where locally distinctive character is conserved and enhanced. Neighbourhoods in the North and East of the City will have benefited from a significant increase in the quantity and quality of housing;*

- *a City with thriving district centres, which have a distinct local character and provide a good range of accessible public services, retail and local facilities; and*
- *a City defined by excellence in urban design and environmental quality, where its distinctive historic environment is understood, valued, cared for and its potential fully realised.*

Within the Core Strategy the site is located within the South Manchester Regeneration Area.

The following polices within the Core Strategy are of particular relevance to the proposal:

Policy SP 1 - Spatial Principle

- *The Regional Centre will be the focus for economic and commercial development, retail, leisure and cultural activity, alongside high quality city living.*
- *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.*

Policy CC 4 - Visitors - Tourism, Culture and Leisure

- *The City Centre will be the focus for culture and leisure in the City Region. Proposals to improve the appearance, use and accessibility of all cultural and visitor attractions and associated facilities will be supported. The improvement of facilities for business visitors will also be supported.*
- *Development in the City Centre which improves facilities for visitors, including Manchester residents, will be promoted.*

Policy EN 1 Design Principles and Strategic Character Areas

- *Opportunities for good design to enhance the overall image of the City should be fully realised, particularly on major radial and orbital road and rail routes.*
- *Southern Character Area*
    - *New development needs to retain the identity and focus of activity associated with the historic District Centres.*
    - *Where appropriate development along the radial routes such as Princess Parkway should be commensurate in scale with the prominence of its location*

Policy DEL1 Infrastructure and Service Delivery

- *For individual development proposals, developers will be required to:*
  - *Demonstrate, at the planning application stage, that adequate infrastructure capacity can be provided both on and off site to enable the delivery of sustainable development within the site, the locality and the wider area, as appropriate. Where proposals cannot demonstrate the deliverability of supporting infrastructure, they will be refused;*
  - *Ensure that development is phased to coincide with the delivery of additional infrastructure or service capacity as set out in the IDP;*
  - *Ensure that infrastructure assets and services are delivered to adoptable standards. Suitable long-term management arrangements must be put in place with a view to secure adoption by the appropriate authority in the longer term.*

3.3 Planning Assessment

Modern cities require to provide both residents and visitors with digital connectivity to enable their day to day living and enjoy recreational activities, all of which contributes to the vitality of the city and its economic and social sustainability.

The aim to replace existing BT payphones with the improved Street Hub units will generally enhance the public realm and many streetscapes, whilst providing free digital connectivity and other services at no cost to the Council, to enrich the users experience of moving through this public realm. The advantage in terms of advertisement will remove the display of many adverts with deemed consent on existing phone boxes, replacing them with modern LED digital displays to which the Council will benefit from 5% free screen time (circa 438 hours a year per display or 876 hours per unit), all of which will be properly maintained and can be controlled through the requirement for express consent. The adverts will help support this function and as such are in intrinsic part of the development, which given the retail/commercial context of the locale would not be considered as being overly visually incongruous and are such pieces of equipment that are now more commonplace within streetscenes throughout the country.

Planning Policy

Within the National and Local Planning Policy, key themes emerge in relation to the strategic directions and policy objectives. The proposal to upgrade existing BT payphones to Street Hub units appropriately responds to these policies by:

- Providing communication infrastructure in a strategic location that will be a high-quality design and provide enhanced digital connectivity;
- Improving public safety through providing access to emergency services, increased street illumination and reducing anti-social behaviour currently present in existing BT payphone booths;
- Achieving advertising displays that are appropriately illuminated and designed to ensure no hindrance to surrounding transport networks;
- Promoting accessibility and inclusivity with fully accessible community features;

- Enhancing and improving the quality of the public environment and ensuring valued characteristics are protected, to create safe, functional places with strong sense of connection; and
- Promoting sustainability with units being powered by 100% renewable carbon-free energy.

Overall, the proposal is considered to be a highly appropriate response to strategic vision and objectives.

Siting

The locations of the Street Hubs have been primarily identified to replace existing BT payphones, where possible and practicable, although it may see a relocation from the existing payphone site, but also to provide seamless fast, free Wi-Fi service throughout the key commercial, retail, and pedestrian areas within the council, whereby residents, visitors and businesses can all use this service, together with the additional benefits of the Street Hub. In addition, Street Hubs are proposed in areas whereby tourists enjoy recreational facilities, and as such services will enhance the overall tourist experience of the city.

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

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

Likewise, as Street Hubs can provide the Council with valuable data as each unit has environmental sensors that can monitor air, sound and light, in most instances it is beneficial to plan a sequence of Street Hub sites along key routes, so that the information gathered can be better analysed. This free environmental data has its own dashboard and can assist the planning system actively manage patterns of growth in support of national air quality objectives and will be a useful source of real-time data in the delivery of the Council's own green agenda. In a similar vein, Street Hubs have

the capability to monitor pedestrian, cyclist, and vehicle movements and so can help the Council to monitor and, where practicable, develop travel plans for the area.

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

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

Justification for the siting and appearance of the proposed Street Hub has been assessed against up to date national and local planning policies and any other material considerations. As a result, assessment would focus on whether the removal of the existing BT call boxes, when balanced against the replacement of new Street Hub at the application site or in close proximity to the site, creates a significant visual harm that would outweigh the public benefits in this instance.

<u>Proposed Location</u>

The location of the proposed Street Hub unit has been strategically identified to replace and upgrade the existing BT phone box located south of the site, outside No. 720 Wilmslow Road, Didsbury. The revised location has taken into consideration the connection to existing communication infrastructure and location of other on street infrastructure. Specifically, we consider the proposed location is appropriate for the following reasons:

- The proposed site is well-located along a section of the footpath, aligned with existing street furniture to enhance the established streetscape theme without compromising pedestrian movement.
- The new location is considered more suitable than the existing site, as the current booth is currently located in close proximity to an established street tree

and signalled pedestrian crossing. We consider the relocation a preferable solution to prevent potential conflicts and street clutter.

- The surrounding area is a commercial area that includes existing fascia advertising and a nearby pillar advertisement, making it a suitable location.

In response to Council's pre-application advice, we can confirm that the width of the footpath is suitable to accommodate the unit, maintaining a footpath width of approximately 2.9 metres once installed. Furthermore, we consider the addition of the Street Hub unit in the proposed location will improve the public realm and pedestrian experience, particularly through the following:

- Providing in-direct street lighting from the illuminated advertising signs to increase pedestrian safety.
- Providing access to contact emergency services, phone charging ability and connection to WiFi with no charge that are accessible for all members of the community.
- The unit will be a high-quality design complementing the existing development on site but also enhancing visual amenity.

We recognise the advertising precedent set within the surrounding area, which includes fascia signage associated with adjoining shopfronts. It is considered that the proposed unit and associated advertising displays are in keeping with the surrounding area and will not contribute to on-street advertising clutter.

The positioning of the unit also considers the adjoining carriageway and is well setback from the adjacent carriageway with compliant levels of illumination, to ensure no distraction or disruption to passing vehicles.

Overall, we consider the proposed unit location to appropriately integrate within the streetscape whilst improving the safety and amenity of the public realm.

Appearance

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

The proposed design is a slimmer and more compact profile than existing BT payphone box, providing a suitably modern alternative. The user interface is located at a low level and is a similar height to an existing BT payphone unit to ensure that it is accessible to all users.

The appearance of the BT Street Hub unit has a vertical emphasis and by reason of its reduced footprint would give a slender more elegant form of development when compared to an existing payphone kiosk. The appearance of the structure is not considered to be harmful to the wider street scene, especially when taking into account

the nature of the existing phone kiosks. We believe the appearance of the area and street scene will not be compromised by the proposed new BT Street Hub.

The new structure will be set within a commercial setting and pedestrian area that provides access to the nearby shops and links with other streets; and as such the area is well-lit throughout the day. While it is accepted that the BT Street Hub advertisements will be more visible during the hours of darkness or in dull conditions, its appearance would not be out of keeping with the general locale which is well lit by streetlights, window displays and other light emission. In this context, the BT Street Hub design would not appear detrimental to the amenity the streetscape.

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

Advertisements

Amenity impact concerns an assessment of the character of the local area, which includes the nature and type of surrounding land uses and the existing built form within the locality where the proposed advertisement is to be displayed. It is the impact upon local character and any feature of interest in the local environment that the proposed advertisement is assessed. In respect of public safety, the primary consideration is the likely effect an advertisement display would have on drivers and pedestrians and whether the display of an advertising in the position and manner is likely to prejudice public safety.

It is recognised that the purpose of advertising is to be seen but this does not mean advertisements are likely to present a distraction. Advertising is characteristically part of the fabric of commercial centres and are often located alongside main transport routes where drivers and pedestrians are highly likely to see a range of commercial images.

When seen in the overarching context of the street scene, it is considered that the location, size and height of the digital advertisement panels would, on balance, be acceptable in what is a commercial context. 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 pedestrians as highlighted, and not impact vehicles within the surrounding area. In this regard, as previously concluded 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 existing commercial street scene and general locale. The position where the BT Street Hub is to be located in relation to the road would not cause any interference with nearby road signs and or navigational lights. Viewed within the street scene setting, the digital advertisements would be partially seen by passing motorists but, due to their location away from the roadside, would not create confusion nor influence the behavior of drivers to such a degree that they would cause a hazard by reason of their presence. Furthermore, given its location it would not give rise to any potential impact on 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.

Regarding pedestrian safety, the placement of the unit and advertisement displays has been carefully considered to maximise safety while minimising obstruction to the existing footpath. When in installed the unit will maintain 2.9m of the primary footpath to the shopfronts and be setback a distance of 500mm from the carriageway. Ultimately, we consider that the proposal will not negatively impact pedestrian flow.

In determining the above, consideration has also been given to the fact that the Department for Transport Manual for Streets (2007) confirms that there is no minimum width for footways. It suggests that in lightly used streets, the minimum unobstructed width for pedestrians should generally be 2000mm, and that is areas of higher pedestrian flow the quality of the walking experience can deteriorate unless sufficient width is provided. Inclusive Mobility (2002) advises that ideally the width of the footway should be 2000mm to facilitate two people in wheelchairs to pass each other comfortably. Where this width is not possible, a clear width of 1500mm should be provided, with an absolute clear minimum width of 1000mm in exceptional cases. The phrase ‘clear’ refers to the effective width taking into account permanent obstacles on the footway such as street lamp standards, trees, telegraph poles, bus shelters for example. Furthermore, the Disability Discrimination Act (DDA) itself recommends a minimum footway width of 1200mm.

The proposed usage for the screens has been set in accordance with Schedule 2 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007:

1. No advertisement is to be displayed without the permission of the owner of the site or any other person with an interest in the site entitled to grant permission.
2. No advertisement shall be sited or displayed so as to—
   (a) endanger persons using any highway, railway, waterway, dock, harbour or aerodrome (civil or military);
   (b) obscure, or hinder the ready interpretation of, any traffic sign, railway signal or aid to navigation by water or air; or
   (c) hinder the operation of any device used for the purpose of security or surveillance or for measuring the speed of any vehicle.
3. Any advertisement displayed, and any site used for the display of advertisements, shall be maintained in a condition that does not impair the visual amenity of the site.

4. Any structure or hoarding erected or used principally for the purpose of displaying advertisements shall be maintained in a condition that does not endanger the public.
5. Where an advertisement is required under these Regulations to be removed, the site shall be left in a condition that does not endanger the public or impair visual amenity.

The Transport for London's (TfL) policy document 'Guidance for Digital Roadside Advertising and Proposed Best Practice – 2013' [the TfL Guidance] has also been a key document in the design and site selection process.

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

- There would be no conflict with any traffic signs, signals, crossing points, schools, hospitals or low bridges.
- No sightlines or clearances would be affected.
- The TfL guidance states that 'Static digital advertising is likely to be acceptable in locations where static advertising exists or would be accepted.' There is existing traditional advertisement on similar sections of the respective roads in many cases.
- The geometry of the roads is not complicated, and the driving conditions are not considered to be demanding or complicated.
- The advertisements would not be experienced by a driver in conjunction with any other similar digital advertisements.
- As per the TfL guidance, the advertisements would be located as close to the driver's natural eye line as possible and facing as head-on to the traffic as is practical. The lighting levels noted above are within the levels set for this type and size of screen (those under 10m2) as set by the Institute of Lighting Professionals, Professional Lighting Guide 05: The Brightness of Illuminated Advertisements (2015). A copy of this document is appended for clarity.

Noise Management

As one of many features, Street Hubs provide free phone calls via a speaker and microphone system. Information submitted in support of this application identifies the steps taken to ensure that these calls, like all the features of the Street Hub, help improve the amenity of a local area whilst also respecting the expectations of local community over time. It should be noted that the 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 Street Hub has been designed so that they create a 'sound cloud' for the person making a call with noise levels sufficient to make calls with background noise for the

surroundings. Whilst this generates a reasonable conversational volume in proximity to the Street Hub, it is intended to result in minimal to no noise being noticeable further away. 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

Noise is managed by exception based on feedback from users and the local community. If feedback is received that the Street Hub may be causing detrimental environmental impact, the following actions are taken:

1. Understand the reason for the issue and any extenuating circumstances. At this point BT 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. Verify the evidence provided against the Street Hub's call history and other operational data as required. This will allow an understanding of the the number, time, and frequency of outbound calls being made and better understand the severity of the reported situation.
3. Once the situation has been verified, BT 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.

In addition to the above, BT will continue to monitor the situation and listen to ongoing feedback from the community as we do take matters seriously. BT continue to learn as part of their roll out as to how Street Hub are fitting in to the community. To date, there has been no issues in respect of matters relating to potential noise nuisance.

4.0 Conclusion

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

The proposed BT Street Hub structures are of a high quality, accessible design that would be a significant improvement when compared to the existing payphone kiosks. Modern signage which is interactive and multi-faceted in its use has become more acceptable on the street scape due to its functionality, clean and modern look. We consider the proposal in this case to be appropriately sited; to reduce street clutter, to improve available footway widths, not to negatively affect heritage assets nor adversely affect amenity or public safety**.**

We believe this statement has demonstrated that the BT Street Hub proposal is in accordance with national policy set out in the NPF4 and local development plan policies, in which we would hope that this application can be supported by your Council.

4.1 Proposed Schedule of Operating Conditions

To give assurance each Street Hub will operate as intended, we recommend the following conditions (or a version there of) as previously suggested, be included as part of any advertisement consent:

a. *Within three (3) months of development commencing, the existing BT payphones indicated for removal, shall be removed in their entirety and the land 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: The Brightness of Illuminated Advertisements'.*

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.*