

Our ref: MAN202

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31/10/22

Dear Sir or Madam

BT COMMUNICATIONS STREET HUB PROJECT
FULL PLANNING & CONSENT TO DISPLAY ADVERTISEMENTS APPLICATIONS
MAN202 – Pavement o/s 1 Victoria Avenue, Blackley, Manchester, M9 6RA

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

To recap, the InLink UK service was first launched in 2017 and since then 494 InLink structures were rolled out in 23 cities. These first-generation units offer 1Gbps free public Wi-Fi, free UK calls, USB charging, an emergency services button and a range of other digital services for those in the vicinity. HD displays on the sides are used to carry advertising, which helped to fund the units and its free services, but the screens can also show local content free of charge. The suppliers of InLinks unfortunately went into administration in 2019 and are no longer able to supply units to BT, hence this product is no longer available. Since then, BT have been working on a new and improved unit of their own, the BT Street Hub 2.0, that they are keen to rollout in your local authority area.

BT Street Hub Project

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

Since the rollout of InLinks, there has been increased focus on green initiatives and environmental monitoring. BT Street Hubs take this into account and have sensors that can count pedestrian, cyclist and vehicle movements as well as monitor air, sound and light. This free information has its own dashboard and will help the planning system actively manage patterns of growth in support of national air quality objectives and the Government's ten-point plan for a Green Industrial Revolution. It can be a useful source of real-time data in the delivery of the Council's own green agenda, travel plans and the data collected can help present a business case for carbon offset credit.

Overall, BT Street Hubs will help future proof the high street making them smarter, safer, and more sustainable, while also providing a valuable contribution to the Government's aim to improve wireless communications across the UK. 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 BT Street Hubs across the UK. They are continuing their commitment to invest and improve in the high street, with one BT Street Hub

at a time, and with that decluttering these environments with the associated removal of existing BT phone boxes.

It should be highlighted from the outset that this is a joint submission for full planning permission relating to the installation of the BT Street Hub itself and consent to display advertisements relating to the 2no. digital screens that will be hung within the unit. The applications have been submitted as one via the Planning Portal and so should be split into two separate cases by the LPA using the same documentations, one for Full Planning Permission and one for the Consent to Display Advertisements. In this respect the submission comprises of the following documents:

- Site specific Planning, Design and Access statement
- Application forms and certificates generated by the Planning Portal
- The prescribed combined fee of £924 paid directly to the Council via the Planning Portal
- Location Plan with the application site edged in red
- Proposed Site Plan
- Existing and Proposed Elevations
- Photomontage of the proposed installation
- Removal Kiosk Site Plans
- BT Street Hub All Elevation Spec Drawing
- BT Street Hub All Unit Elevations
- BT Street Hub Product Statement giving full details of the proposed structure
- BT Anti-Social Behaviour Management Plan
- 'The Institute of Lighting Professional's 'Professional Lighting Guide 05: The Brightness of Illuminated Advertisements' 2015 (ILP) for your reference, and:
- International Commission on Non-Ionizing Radiation Protection (ICNIRP) certificate.

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

The application site and BT Street Hub proposal itself are found on adopted highways-controlled land that is maintained at the public expense. BT are a statutory undertaker and can install communications equipment on the adopted highway, hence an owner's notice has been served on the Highways Authority and any others who have been identified from Land Registry records.

We trust the applications can be registered at your earliest opportunity, whereby you can assign references and for consistency allocate the same case officer to deal with both full planning and advertisement consent elements. We look forward to hearing from you soon with this detail in which should you require any further information to validate the applications or have any queries please do not hesitate to email me.

Yours faithfully



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Planning, Design and Access Statement

Our Ref.	MAN202
Lat/Long	53.5324486 -2.208735265
Project Type	BT Street Hub
Conservation Area	The proposal is not within a conservation area
Statutory Listed Buildings in vicinity	N/A

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

Proposed Install

MAN202 – Pavement o/s 1 Victoria Avenue, Blackley, Manchester, M9 6RA



Proposed Removal 1 & 2**Tel: 01617406689 & 01617406485****Address: JNC ROCHDALE ROAD PCO1 VICTORIA AVENUE MANCHESTER****Planning Legislation**

This application is for full planning permission under section 62 of the Town and Country Planning Act 1990 [the 1990 Act] and express advertisement consent under regulation 9 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 [the Regulations]. Applications for full planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise (Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the 1990 Act). Under the advertisement Regulations, Express Consent is required for the advertisement element, notably the 2no. digital screens on each side of the BT Street Hub. As per

regulation 3 of the Regulations, applications for Express Advertisement Consent must be determined in the interests of amenity and public safety, considering (a) the provisions of the development plan, so far as they are material, and (b) any other relevant factors.

UK Digital Strategy

Digital connectivity is now considered to be a utility, and modern life is increasingly impossible without it. Connectivity drives productivity and innovation and is the physical underpinning of a digital nation. Being connected is fundamental to the success in our modern forward-thinking streets and the proposed BT Street Hub provides a cost-free way for communities to get online and take advantage of available opportunities. The Government has committed that every individual and every business should have the skills and confidence to seize the opportunities of digital technology and have easy access to high-quality internet wherever they live, work, travel or learn. An update to the UK's Digital Strategy was published in June 2022 and reaffirms the continued promotion of the government's policy of delivering improved digital infrastructure and connectivity.

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. In 2016, the DCMS produced the following statement in response to this need and stated: *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.* The proposed BT Street Hub subject to this application provides valuable communications infrastructure to help meet the increasing demands for high quality mobile connectivity.

UK Government Sustainable Development Goals

The 2030 Agenda for Sustainable Development is a historic global agreement to eradicate extreme poverty, fight inequality and injustice and leave no one behind. Agreed by world leaders at the UN in 2015, the 17 Sustainable Development Goals (SDGs) are fully embedded in the activity of each government department. One of the Government's primary focuses to achieving Sustainable Development Goal 8 (*Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all*) and Sustainable Development Goal 9 (*Build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation*) is to increase economic growth and productivity through improved digital connectivity. The proposed BT Street Hub subject of this application will provide a valuable addition to these Sustainable Development Goals.

National Infrastructure Strategy

Published in November 2020, the Government acknowledges in its National Infrastructure Strategy that investment in our infrastructure is critical as the UK seeks to recover from the Covid-19 pandemic. The Strategy puts innovation and new technology at its heart, in which BT Street Hub is at the forefront of this technological revolution. The Government's ambition is to support fast and reliable digital connectivity that can deliver economic, social and well-being benefits because new technologies have enormous potential to improve the environment and the daily lives of people across the UK. BT Street Hubs can provide an important contribution to this with their suite of features, including Wi-Fi; small cell 5G capabilities; air monitoring and much more.

National Planning Policy Framework, 2021

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied and is a material consideration for both the Full Planning and Advertisement Consent applications.

In the context of transport related matters as set out in Chapter 9 of NPPF, the following paragraphs are applicable to this BT Street Hub case:

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

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

The NPPF supports the provision of high-quality communications infrastructure as set out in section 10. These relevant paragraphs are highlighted below:

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

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

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

Paragraph 118 - Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure. The NPPF states the following specifically in relation to advertisement control in section 12:

Paragraph 136 - The quality and character of places can suffer when advertisements are poorly sited and designed. A separate consent process within the planning system controls the display of advertisements, which should be operated in a way which is simple, efficient and effective. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.

Code of Practice for Wireless Network Development in England

The Code of Best Practice has been fully revised, and the latest version was published by DCMS in March 2022. It acknowledges that the planning system plays a key role in delivering the digital infrastructure that we need, in a sustainable and well-designed way, especially as households and businesses become increasingly reliant on mobile connectivity. The principal aim of the Code is to ensure that the Government's objective of supporting high quality communications infrastructure, which is vital to continued economic prosperity and social inclusion for all, is met. The Code confirms that the development of Wireless Network infrastructure must be achieved in a timely and efficient manner, in a way that balances connectivity requirements with the economic, community and social benefits that this brings with the environmental considerations associated with such development. BT Street Hub has a key role to play in delivering the necessary infrastructure to support the increasing reliance on mobile connectivity at a street level and so accords with the Code of Best Practice.

Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2022

This recent Order, which came into force in April 2022, amends Class A of Part 16 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015 and relaxes restrictions on developments consisting of the installation of electronic communications apparatus. The planning process is a key part of the development of electronic communications infrastructure, and the changes are hoped to strike a balance between providing a framework that speeds up the delivery of the required infrastructure, as well as encouraging the use and sharing of existing sites and mitigating the impact of new development where that is required. While the main function of the BT Street Hub is to provide the range of communications services previously discussed (in line with Government policy), the structure also incorporates advertisement screens which helps to fund the free features. The BT Street Hub does not benefit from the recently extended Permitted Development Rights because of the dual purpose of the structure, but the principles behind the relaxation of restrictions on electronic communications apparatus are relevant to this application as each unit modular and has the ability to accommodate a small cell within it.

Institute of Lighting Professionals, Professional Lighting Guide 05: The Brightness of Illuminated Advertisements

As per the Institute of Lighting Professionals, Professional Lighting Guide 05: The Brightness of Illuminated Advertisements (ILP), which is included as one of the accompanying supporting documents for the application, confirms that the maximum permitted luminance of an area up to 10m² (i.e Street Hub) in a Zone E4 (urban) is 600 cdm⁻² at night (page 24 of the ILP). It goes on to state in Note 1, that "during the daytime sign luminance should never exceed 5,000 cdm⁻²." As detailed in the BT Street Hub Product Statement, the proposed screens would not exceed 600 candelas between dusk and dawn and 2500 candelas during daylight hours, this is in accordance with industry standards as detailed in the ILP guidance document, see extract below for reference.

Table 4: Maximum permitted recommended luminance (cdm ⁻²)					
Illuminated area (m ²)	Zone E0	Zone E1	Zone E2	Zone E3	Zone E4
Up to 10	0	100	400	600	600
Over 10	0	n/a	200	300	300

Note:

1. For digital signs when the content may change then the rate of change should be limited to once every five seconds. Moving images, animation, video or full motion images should not be displayed at locations where they could present a hazard for example if they could be seen by drivers in moving traffic. During the daytime sign luminance should never exceed 5,000cdm⁻².

Manchester's Local Development Framework - Core Strategy 2012-2027

It is considered that the following Core Strategy policies are applicable and in accordance with this case:

Policy CC 4: Visitors – Tourism, Culture & Leisure

Policy CC 8: Change and Renewal

Policy CC 9: Design and Heritage

Policy C 3: North Manchester District Centres - Cheetham Hill and Harpurhey

Policy C 4: East Manchester District Centres - Eastlands, Gorton, Newton Heath and Openshaw

Policy C 5: Central Manchester District Centres - Hulme, Longsight and Rusholme

Policy C 6: South Manchester District Centres - Chorlton, Didsbury, Fallowfield, Levenshulme and Withington

Policy C 7: Wythenshawe District Centres - Baguley (West Wythenshawe), Northenden and Wythenshawe Town Centre

Policy T 2 Accessible areas of opportunity and need

Policy EN 3 Heritage

Policy EN 16 Air Quality

Greater Manchester Combined Authority – Places for Everyone

Nine councils in Greater Manchester have now submitted the Places for Everyone plan to the Secretary of State for Levelling Up, Housing and Communities.

It is considered that the following Strategic Objectives are applicable and in accordance with this case:

Objective 2: Create neighbourhoods of choice.

Objective 3: Playing our part in ensuring a thriving and productive economy in all parts of Greater Manchester

Objective 5: Reduce inequalities and improve prosperity

Objective 6: Promote the sustainable movement of people, goods and information

Objective 9: Ensure access to physical and social infrastructure.

Pre-Application Consultation

Solutions 30 UK, on behalf of BT, have already had discussions and approvals of this project with Manchester City Council so a full paid pre-application was deemed excessive for these next batches of sites.

We sent out a re-introductory email to the Manchester Planning team with a list of proposed sites for the next set of BT Street Hub sites and an invitation to respond was sent on 21st and 26th of September.

Planning History

It is noted that in the vicinity of the application site there is advertisement presence, in which there are many transferable points that can be had with this BT Street Hub proposal. As detailed below, previous applications for likened forms of development were deemed acceptable and in keeping with the street scene. Additionally, Street Hubs have become an accepted development within the street scene within the LPA, as shown by the approvals within Manchester detailed below

LPA Ref – 114492/AO/2016

Site Address – Pharmacy Medical Centre Victoria Avenue Blackley Manchester M9 6RA

Decision – Approved

LPA Ref – 134845/AO/2022

Site Address – Unit 23 Harpurhey Shopping Centre Lee Road Manchester M9 4DH

Decision – Approved

LPA Ref - 126156/AO/2020

Site Address – Hilton International Outwood Lane Manchester M90 4WP

Decision – Approved

LPA Ref - 132558/AO/2021

Site Address – Unit A2 Cheetham Hill Retail Park Elizabeth Street Manchester M8 8BB

Decision – Approved

LPA Ref - 130998/AO/2021

Site Address - 70 Bury Old Road Manchester M8 5BN

Decision - Approved

Direct conversion

In this instance the proposed BT Street Hub has been progressed as a direction conversion of an existing suited BT kiosks as it is considered that its siting and appearance continues to fit into its immediate street scene context. It is felt that the BT Street Hub will be a clear improvement from the existing on-site arrangement. By removing these suited kiosks for 1 Street Hub it would significantly reduce street clutter on this stretch of pavement and enhance the streetscape.

Siting Justification against Planning Policy

At the conception stage, we have tried to focus on pursuing direct conversions of existing kiosks wherever practicable when considering the existing street scene layout and furniture. We have looked for locations with wide pavements, and where a site's relationship with existing street furniture avoids an overwhelming proliferation of street clutter. It should be recognised that BT's legacy estate of payphones has grown up organically over the years and the location of existing BT kiosks can sometimes sit in street scene environments that have changed completely since they were first established on-site. In some instances, the BT Street Hub project has been seen as an opportunity to improve the pedestrian environment 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 license and universal service obligation with Ofcom to provide a street level phone service, so the selection process of associated kiosks to be removed has had to take this into account. The new unit provides for free telephone calls, has quick links to charity lines and an emergency 999 button, 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 BT Street Hub sites wherever possible, so that this can improve connectivity and the user experience as they travel through an area.

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

vehicle movements, hence in building a strategic network of BT Street Hub units it will help the Council to monitor and develop travel plans for the area.

The introduction of any form of development within a particular environment will always be, to some degree, a noticeable addition or change to those residents, businesses and regular passers-by found closest. However, it should be appreciated that the visibility of something that is new or the change in form that has an established presence on-site, like a telephone kiosk to a BT Street Hub unit with digital advertisements, 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 phone boxes with BT Street Hub units where they will be in-keeping with their existing surroundings. In this regard it is seen as an opportunity to create an up-to-date network of sites and so help futureproof the high street making them smarter, safer, and more sustainable.

In progressing new BT 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 BT Street Hub has been considered having regard to the available footpath widths; the whereabouts of the existing payphones to be removed, and the visual character of the street scene. With regards its associated advertisement screens and as will be discussed later in this statement, careful consideration has been given to its siting whereby the immediate context and public highway safety issues have been taken on board. These criteria have been adjusted where necessary on a site-by-site basis to account for local context and policy requirements when assessing the site's suitability to accommodate a new BT Street Hub unit.

Justification for the siting and appearance of the proposed BT Street Hub unit itself, 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 BT Street Hub with all its added features at the application site, creates a significant visual harm that would outweigh the public benefits.

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

Siting

This proposal involves the removal of 2no BT existing call boxes in association with 1no proposed new BT Street Hub. At a strategic level the removal of these existing phone boxes will declutter street scenes throughout your authority and when comparing the footprint of existing call boxes to be removed and proposed BT Street Hub, it will free up more pedestrian space.

Victoria Avenue is a busy highway for both vehicular and pedestrian traffic. The street scene context immediate to the proposed BT Street Hub site is generally retail and comprises a number of shops. In the immediate vicinity of the proposed BT Street Hub site there is existing street furniture including road signage, streetlights, plant boxes, post box, existing telephone kiosks with advertisement and litter bins. Viewed within this street scene context, it is considered that the siting of the proposed BT Street Hub is appropriate.

As there are already two kiosks with advertisements situated at the proposed location, the BT Street Hub should be deemed acceptable as a replacement which would contemporise the current service in line with the surroundings. Replacing the older kiosks with a modern, slimmer design will have a smaller footprint on the area, decluttering the streetscape, as well as adding to public amenity through design features such as free wifi and phone line availability.

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

Appearance

The proposed BT Street Hub 2.0 unit is an advanced, modern development which has been designed following significant improvements in technology and digital content over recent years from when BTs first generation unit, InLink was rolled out.

It can promote the image of the authority as a vibrant place, in which 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 BT Street Hub is replacing. The user interface is located at a low level and is a similar height to an existing BT payphone unit to ensure that it is accessible to all users.

The appearance of the BT Street Hub unit has a vertical emphasis and by reason of its reduced footprint would give a slender, more elegant form of development when compared to an existing payphone kiosk. The appearance of the structure is not considered to be overly harmful to the wider street scene, especially when considering the nature of the existing payphones to be removed. Its height and dimensions are justified when taking into account the features it incorporates such as small cell, in which we believe the appearance of the area will not be compromised by the proposed new BT Street Hub.

The new structure will be set within a generally commercial setting and busy stretch of road that is dominated by vehicular and pedestrian movements; hence it is well-lit throughout the day. While it is accepted that the BT Street Hub advertisements will be more visible during the hours of darkness or in dull conditions, such matters can be controlled by condition and can be operated in accordance with levels of illumination as set out in the Institute of Lighting Professional's 'Professional Lighting Guide 05: The Brightness of Illuminated Advertisements' 2015. In this respect the digital screens will be operated within UK industry standards appropriate for the area and so their presence would not appear untoward with this stretch of road which is well lit by streetlights and window displays. In this context, the BT Street Hub design would not appear detrimental to the amenity of this locality.

It is concluded that the dimensions and design of the proposed BT Street Hub are justified, and its appearance is an improvement when compared to the BT call boxes that are to be removed. Furthermore, the added features and communications

facilities within the new unit are in full accordance with the Government's digital policies and strategy which seek to promote improved connectivity. When balanced against such matters, it is considered that the appearance of the proposed BT Street Hub itself is acceptable and is in accordance with national and local planning policies.

Pavement Width

The total existing pavement width at this location is 6801mm. The total width of the BT Street Hub is 1236mm (tapering down to a footprint width of 1201mm on the pavement). With the BT Street Hub being located 2600mm off the kerb, the remaining available footway allows for safe circulation space around the unit and will not restrict passing pedestrians' movements. 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

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

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

It is recognised that all advertisements are intended to attract people's attention, however in this case their siting and size would not create an untoward feature within the street scene. The position where the BT Street Hub is to be located and the orientation of the advertisement screens 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 pedestrians / 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 BT 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 considered that the BT Street Hub would not appear as an inappropriate feature to motorists.

With regards pedestrian safety, the BT Street Hub is positioned away from the road edge on a wide section of pavement without impeding pedestrian movements as ample footway width would be retained. Allowing for the orientation of the BT Street Hub's user interface in relation to passing motorists, the public safety of those using it would not be put at risk as they would be set off the kerb edge.

There are suited payphone kiosks at this location currently displaying advertisements east and west of the kiosks. As such advertisement presence is already felt within this area. The new proposed BT Street Hub would be an upgrade to the current outdated kiosks present, enhancing the amenity within the area.

The proposed usage for the screens has been set in line with Transport for London's (TfL) policy document 'Guidance for Digital Roadside Advertising and Proposed Best Practice – 2013' [the TfL Guidance]. Each BT Street Hub location has been assessed against and would comply with the following additional criteria from the TfL Guidance.

- There would be no conflict with any traffic signs, signals, crossing points, schools, hospitals or low bridges.
- No sightlines or clearances would be affected.
- The TfL guidance states that 'Static digital advertising is likely to be acceptable in locations where static advertising exists or would be accepted.' There are existing traditional advertisement on similar sections of the respective roads in many cases.

- The geometry of the roads are not complicated and the driving conditions are not considered to be demanding or complicated.
- The advertisements would not be experienced by a driver in conjunction with any other similar digital advertisements.
- As per the TfL guidance, the advertisements would be located as close to the driver's natural eye line as possible and facing as head-on to the traffic as is practical.

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

It should be noted that the digital screens can be used by the Council as there is 5% free screen time allocated on each BT Street Hub unit. BT are also gifting free advertising space to nominated small businesses which is an added benefit to the local economy.

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, and 2,500 candelas per square metre (cd/m²) during the daytime, 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.
- H. This advertisement consent shall remain valid for a period of 10 years from the date of consent.

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

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

Conclusion

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

The proposed BT Street Hubs structures are of a high quality, accessible design that would be a significant improvement when compared to the existing BT payphones that are to be replaced. We consider the proposal in this case to be appropriately sited; to reduce street clutter, to improve available footway widths, not to negatively affect heritage assets nor adversely affect the visual amenity or public safety. We believe this statement has demonstrated that the BT Street Hub proposal is in accordance with national policy set out in the NPPF and local development plan policies, in which we would hope that this application can be supported by your Council.