

Planning, Design and Access Statement

Our Ref.	KNOW003
Lat/Long	53.412876, -2.8397003
Project Type	BT Street Hub
Conservation Area	The application site is <u>not</u> within the nearby St Michaels Church Conservation Area
Statutory Listed Buildings in vicinity	None

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 1no. associated BT payphone.

Proposed Install

Pavement o/s Citizens Advice, Cavendish Walk, Huyton Village Shopping Centre, Liverpool, L36 9YG



Proposed Removal 1

Tel 01514493573

Pavement on Kingsway Parade, Huyton, Liverpool, L36 2QA



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 & 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.

Knowsley Local Plan

Where applicable, it is considered that the following Local Plan policies are applicable and in accordance with this case –

Strategic Objective 1 – Sustainable Economic and Employment Growth

To encourage and maintain sustainable economic and employment growth in Knowsley, complementary to that within the wider Liverpool City Region, by accommodating employment related development, improving skills within the workforce, and promoting enterprise, entrepreneurship and innovation.

Strategic Objective 2 - Well-balanced Housing Market

To promote a well-balanced housing market throughout Knowsley by providing a sufficient quantity and mix of high-quality sustainable housing in appropriate locations to meet needs and demand (including for market, affordable and supported housing)

Strategic Objective 3 – Regeneration and Transform

To regenerate and transform areas of social and economic deprivation so they become more sustainable, safer, healthier and more cohesive communities, thus narrowing the gap between the richest and poorest communities in Knowsley.

Strategic Objective 4 – Distinctive, Viable and Sustainable Town Centres

To promote distinctive, viable and sustainable town centre in Huyton, Kirkby and Prescott, by improving choice, variety and quality in their range of retail, leisure and other town centre uses, together with thriving district centres, including enhancement of those in Halewood and Stockbridge Village, and a more sustainable pattern of local centres.

Strategic Objective 5 – Quality of Place

To promote the quality of place within Knowsley by protecting historically important features and enhancing the character, quality and diversity of Knowsley's built environment, including town centres, key employment areas, residential neighbourhoods, green spaces, conservation areas, rural areas and villages, key gateways and transport routes.

Strategic Objective 6 – Sustainable Transport

To ensure new development in Knowsley encourages a reduction in the overall need to travel, and priorities sustainable transport such as walking, cycling and public transport. This will help to ensure accessibility and linkage between housing areas and employment locations, shopping, leisure, culture, health care, education, community and sporting facilities, green spaces and other services.

Strategic Objective 7 – Manage Environmental Resources

To manage environmental resources in Knowsley prudently by focusing on sustainable development, recycling and renewable technologies, minimising pollution, reducing carbon emission and responding to the impacts of climate change.

Strategic Objective 8 – Green Infrastructure and Rural Areas

To support and strengthen the role of Knowsley's Green Infrastructure (in rural and urban areas), promote biodiversity, and maintain the character of rural settlements including Cronton, Tarbock and Knowsley Village.

Strategic Objective 9 – Promoting Health and Wellbeing in Knowsley

To address existing health inequalities and encourage enhancements to the health and wellbeing of Knowsley's residents by ensuring a health promoting environment and provision of health lifestyle options for those living and working in the borough.

Pre-Application Consultation

A pre-application consultation email was first sent to the LPA on the 14th February 2022 which introduced the project and 3 BT Street Hub sites found around the authority. As these sites were all direct conversions of existing ST6 kiosks with advertisement displayed, it was considered that when balancing the fees of the LPA for informal advice, together with those incurred for a formal determination, the proposal subject to this application would be advanced. All 3 sites sent to pre-app at this time were subsequently approved by the LPA.

On 11th May 2022 a second round of LPA pre-application consultation discussions were initiated via email (LPA Ref 2200027/PREAPP). Following some correspondence regarding fees and suitable dates an online meeting was held on 16th August 2022 between members of Solutions 30, BT and Knowsley Metropolitan Borough Council to discuss four new potential BT Street Hub sites. This meeting was followed up with a formal written response on 24th August 2022. Whilst the position of the LPA towards the sites was largely positive, with the officer stating: *'The sites are suitable in principle for street hubs,'* some site-specific matters were raised. Specifically on highways matters for the application on Cavendish Walk, the officer stated: *'This location is within the pedestrianised area of Huyton Village. It would not present a hazard or constraint to pedestrian traffic and therefore no objection would be raised.'* Where practicable, all such matters raised have been taken on board when finalising this case and have been addressed within this submission. A final point worth noting is that at the time of pre-application submission a two for one offering of existing payphone kiosks to new BT Street Hubs was proposed. However, due to new technical restrictions imposed by Ofcom in the summer of 2022 this has not been possible for all 4 sites discussed with the LPA. The proposal on Cavendish Walk is an example of this where now only one BT payphone kiosk is set to be removed as part of the development.

Planning History

As previously mentioned this application follows an initial batch of BT Street Hub applications in Knowsley which were fast-tracked due to being direct conversions of existing ST6 kiosks and their established nature within the streetscene. It is argued that these 3 approved applications, which are detailed below, help set a strong precedent for developments of this kind in the locality.

- LPA Ref – 22/00170/FUL & 22/00277/ADV
Site Address – Pavement o/s no.34 Derby Road, Huyton, Liverpool, L36 9UJ
Proposal – Removal of 1no. BT phone kiosk and display of signage comprising 2no. internally illuminated digital LCD glass display screens.
Decision – Approved 29/04/2022
- LPA Ref – 22/00171/FUL & 22/00276/ADV
Site Address – Pavement at St Chad's Parade, Kirkby Town Centre, Liverpool, L32 8RH
Proposal – Removal of 1no. BT phone kiosk and display of signage comprising 2no. internally illuminated digital LCD glass display screens.
Decision – Approved 29/04/2022

- LPA Ref – 22/00169/FUL & 22/00278/ADV
Site Address - Pavement o/s William Hill, 83/84 Derby Road, Huyton, Liverpool, L36 9UQ
Proposal – Removal of 1no. BT phone kiosk and display of signage comprising 2no. internally illuminated digital LCD glass display screens
Decision – Approved 10/06/2022

New site

In this instance, the proposed BT Street Hub on Cavendish Walk does not sit upon the exact footprint of an existing BT kiosk. This is because in replacing the existing BT phone booth, it was felt to be an inappropriate location for a new BT Street Hub so we have used this as an opportunity declutter and in turn sought to identify a more suitable position elsewhere.

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 1no BT existing call box 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.

Cavendish Walk is a busy pedestrianised highway. The street scene context immediate to the proposed BT Street Hub site is generally commercial and comprises a number of shops and restaurants including Costa, Pound Bakery, Card Factory, Dominoes etc. In the immediate vicinity of the proposed BT Street Hub site there is existing street furniture including street lighting columns, benches, litter bins and temporary outside restaurant seating. Viewed within this street scene context, it is considered that the siting of the proposed BT Street Hub is appropriate.

The application site is not located within the nearby St Michaels Church Conservation Area. Clearly there will always be challenges faced in finding a balance between limiting any visual harm created by the siting of development upon heritage assets when weighed up against the public benefits it will bring to the area. When seen in perspective within the street scene, the proposed siting and orientation of the BT Street Hub, will not have a significant material impact on the setting or views of the nearby Conservation Area. It is considered that any harm upon heritage assets would be outweighed by the removal of the existing call boxes and the public benefit features of the BT Street Hub proposal. The siting of the proposed BT Street Hub will not appear incongruous within this vibrant part of Huyton town centre given the modern frontages and street furniture found along this stretch of road. It is also worth noting that there are no listed buildings in proximity to the site.

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 taking into account 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 be 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, most notably the setting of the nearby St Michaels Church Conservation Area.

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 11800mm. 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 500mm off the kerb, the remaining available footway of 10100mm 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

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 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.

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 Professionals' '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.