

PLANNING DESIGN & HERITAGE STATEMENT

Town and Country Planning Act 1990

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

Kirklees

November 2025

INTRODUCTION

1. This Statement is submitted in support of a dual application by New World Payphones (“NWP”) seeking both planning permission¹ and express advertisement consent².
2. Consent is sought for the installation of new digital communications kiosks in Huddersfield and Dewsbury, to be located at:
 - Opposite 10 Foundry Street, Dewsbury
 - Outside 17 – 17A King Street, Huddersfield
 - Outside 30 John William Street, Huddersfield
 - Outside 36 New Street, Huddersfield
 - Outside 112 – 118 New Street, Huddersfield
3. Each kiosk will deliver a suite of public-facing functions including access to an emergency defibrillator, wayfinding, and real-time information services, alongside static illuminated advertising panels. The proposals form part of NWP’s national programme to expand modern telecommunications infrastructure in towns and cities across the UK.
4. The National Planning Policy Framework (“the Framework”) recognises that high-quality, reliable communications networks are vital for economic growth and social well-being. It makes clear that planning decisions should support the expansion of electronic communications networks, including next-generation mobile technology (such as 5G)³, and should not seek to inhibit competition between operators or question the need for new systems⁴.
5. The Code of Best Practice on Mobile Network Development in England (2022) reinforces this position and confirms that there should be a presumption in favour of facilitating development that supports electronic communications.

¹ Section 62 of the Town and Country Planning Act 1990

² Regulation 9 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007

³ Paragraphs 119 and 120 of the National Planning Policy Framework (December 2024)

⁴ Paragraph 123 of the National Planning Policy Framework (December 2024)

6. NWP is an Electronic Communications Code Operator under the terms of the Telecommunications Act 1984 and has statutory powers enabling it to install and operate electronic communications apparatus within the highway. NWP is the UK's second-largest operator, with a national estate of approximately 2,000 kiosks.
7. In addition to this Statement, the submission includes the following documents:
 - Application Form: Planning and Advertisement Consent
 - Site Location Plan
 - Site Plan (
 - Proposed Kiosk Elevations
 - New World Payphones Kiosk Specifications Document
 - Management Plan
 - Completed Community Infrastructure Levy Form
8. The requisite fee will be submitted via the Planning Portal for the attention of the local planning authority.

THE PROPOSED KIOSK

9. Approximately 2.68 million people in the UK—including an estimated 560,000 in Greater London—do not own a mobile phone. While smartphone usage is widespread, public telephone infrastructure continues to provide a vital safety net for those without access to a landline or working mobile device.
10. Public phone boxes remain especially important in areas where mobile coverage is unreliable or limited. In such locations, they may represent the only means of contacting family and friends, essential helplines, or emergency services.
11. This need is acknowledged by Ofcom:

“For those without access to a landline or working mobile, or in areas with poor mobile coverage, a public call box can be the only option for making calls to friends and family, helplines and, crucially, emergency services”.

12. Between June 2019 and May 2020, nearly 150,000 emergency calls were made from public telephone boxes. In the same period, 25,000 calls were placed to Childline and 20,000 to Samaritans.
13. However, the way people interact with street-based communications infrastructure is evolving. In response, New World Payphones (“NWP”) is updating its estate to reflect modern needs—offering essential digital services while maintaining basic public telephony in urban areas.
14. The new communications kiosk is constructed from durable, high-quality materials and features a multi-functional public interface, including:
 - A telephone system accepting card, contactless, and cash payments;
 - A portrait-format interactive touchscreen providing wayfinding and public information;
 - Equipment for public Wi-Fi and/or small-cell mobile connectivity;
 - An integrated defibrillator; and

- On the reverse, a digital display (1635mm H x 925mm W) for advertising and public messaging, including emergency alerts and council notices.
15. The kiosk has been sensitively designed to suit its urban surroundings, including sites within conservation areas. Its proportions are modest, its materials contemporary but understated, and its profile is slim to avoid visual dominance.
 16. The open, transparent design enhances inclusivity, supporting use by people with mobility impairments, while helping to deter antisocial behaviour. Aesthetic cues from traditional British phone boxes are retained, balancing heritage with modern functionality in a manner respectful of the historic townscape.
 17. Full details of dimensions, siting, and visual appearance are provided in the accompanying site plans and elevation drawings.

Telephony

18. Telephony remains a core function. Each kiosk provides accessible call services, including free calls to emergency numbers and designated charities, with payments accepted via cash or card.
19. The handset is purpose-built for high-use public environments, featuring a vandal-resistant keypad, an armoured cord with internal steel lanyard, and inductive coupling for hearing aid users. Controls are positioned at an accessible height of no more than 1060mm from ground level, in accordance with BS8300-1:2018 and BS8300-2:2018.
20. Each kiosk is also fitted with remote diagnostic and monitoring systems to ensure operational continuity and prompt servicing where required.

Wayfinding Touchscreen

21. The active (front-facing) side of the kiosk incorporates a user-friendly touchscreen offering local wayfinding tools, including maps, emergency contacts, and information about kiosk functions.
22. This feature benefits both residents and visitors by helping them navigate the town/city and locate key services, transport links, and independent businesses.
23. The touchscreen includes an accessibility mode which repositions on-screen buttons for use by wheelchair users or individuals with reduced mobility, reinforcing the kiosk's inclusive design.

Small Cell Telecommunications Infrastructure

24. The kiosk is designed to host small cell mobile equipment, supporting improvements to 4G and future 5G coverage in areas with high demand for mobile data.
25. Where a coverage need is identified, licensed infrastructure providers may install small cell nodes inside the kiosk, offering network expansion without introducing new street clutter such as masts or cabinets.
26. This co-location of public services and digital infrastructure represents a smart and sustainable solution, particularly in busy city centre settings.

Defibrillator

27. Each kiosk includes a built-in automated external defibrillator (AED), enhancing access to life-saving equipment in emergency situations. With more than 30,000 out-of-hospital cardiac arrests occurring annually in the UK, early access to an AED can significantly improve survival chances.



28. NWP partners with the Community Heartbeat Trust (CHT), a national charity recognised for its work in deploying and managing public-access defibrillators. CHT pioneered the installation of AEDs in phone boxes and supports best practice in their upkeep.
29. Upon installation, each AED is registered with The Circuit—the UK’s national defibrillator network—ensuring its location is known to ambulance services and accessible to first responders in real time.

The Advertisement – British Made

30. The reverse side of the kiosk features a digital advertising panel measuring 1635mm by 925mm. Advertising has long been associated with public phone infrastructure and provides essential funding for the network’s modernisation and maintenance.
31. The display rotates static images every 10 seconds, with no animation or flashing. Transitions between ads will use a gradual fade to minimise potential distraction.
32. Illumination levels will comply with the Institute of Lighting Professionals’ PLG05 (2023) guidance, which recommends a maximum brightness of 600 cd/m² at night and 5000 cd/m² in daylight. The kiosk will operate at reduced brightness levels—280 cd/m² at night and up to 2500 cd/m² in daylight—well within recommended thresholds.
33. Light sensors will monitor ambient conditions and automatically adjust brightness to suit, reducing energy use and visual impact.
34. NWP proposes the following **conditions** to ensure continued compliance and public safety:
- *The development shall operate in accordance with the approved drawings and documents specified by the local planning authority.*
 - *Express advertisement consent shall be granted for a period of five years in accordance with the Regulations.*

- *During periods of darkness, luminance shall not exceed 600 cd/m², in accordance with ILP PLG05 (2023) or any successor guidance.*
- *The panel shall include a default mechanism to freeze the current image in the event of malfunction.*
- *Only static images shall be displayed, with a minimum display time of ten seconds per image.*

Maintenance and Servicing

35. The kiosks are maintained regularly, with physical inspections at least every two weeks. Cleaning includes hand and pressure washing, and inspections confirm the operability of all equipment including telephony, screens, and displays.
36. Full maintenance protocols are set out in the Specification Document and Management Plan submitted with this application.

Environmental Contribution

37. As part of its environmental commitment, NWP has partnered with Trees for Cities, a national charity promoting urban biodiversity and sustainable green infrastructure.



38. For each kiosk installed or upgraded, NWP proposes to fund the planting of a new tree in collaboration with the local authority. Locations can be agreed through a formal agreement such as a Section 75 Planning Obligation.

Council Communications Use

39. To support public engagement, NWP offers the Council one 10-second advertising slot per hour on each screen, free of charge. This can be used to display public service messages, emergency information, or local event details.

International Commission on Non-Ionizing Radiation Protection (ICNIRP)

- 40. The kiosk, including any telecommunications equipment, complies with international standards on public exposure to electromagnetic fields (EMFs), as set by the International Commission on Non-Ionizing Radiation Protection (ICNIRP).
- 41. Public exposure levels from the kiosk will remain well within the safe limits established under EU Council Recommendation 1999/519/EC.
- 42. A Declaration of Conformity with Public RF Exposure Guidelines is available on request and can be submitted to the planning authority as part of the application documentation.

NATIONAL AND LOCAL POLICY CONTEXT

National Planning Policy Framework

43. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning decisions are made in accordance with the development plan unless material considerations indicate otherwise.

44. This statutory requirement is reinforced by the National Planning Policy Framework (NPPF, December 2024), which sets out the Government's planning policies for England. The NPPF is a material consideration in all planning decisions and confirms that the primary aim of the planning system is to contribute to the achievement of sustainable development. Specific guidance on matters such as advertisements and design is provided through Planning Practice Guidance (PPG), which complements the NPPF by offering more detailed policy application advice.

45. Key sections of the NPPF include:

- **Part 6:** Focuses on promoting a competitive economy by encouraging businesses to invest, innovate, and adapt to changing market conditions.
- **Part 8:** Addresses how planning can create healthy and safe communities, emphasizing social interaction, safety, and access to services.
- **Part 10:** Underlines the importance of high-quality communications infrastructure for economic growth and the need for planning policies to support this development.
- **Part 12:** Provides guidance on achieving well-designed places, highlighting the role of design in creating attractive, functional, and sustainable environments

46. **Economic Growth (Section 6, Paragraph 85):** The NPPF directs that planning policies and decisions should help create the conditions for businesses to invest, expand, and adapt. It is explicit that “significant weight

should be placed on the need to support economic growth and productivity,” taking account of both local business needs and wider opportunities for development. Policies should build on local strengths and address future challenges.

47. **Healthy and Safe Communities (Paragraph 96):** Planning policies and decisions should aim to achieve healthy, inclusive and safe places. Specifically, they must ensure spaces are safe and accessible, so that crime and the fear of crime do not undermine quality of life or community cohesion.
48. **High Quality Communications (Paragraph 118):** The Framework states that “advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being.” Planning policies must support the expansion of electronic communications networks, including next-generation mobile technology and full fibre broadband. Local policies should set out the anticipated delivery and upgrading of digital infrastructure, prioritizing full fibre connections for all developments.
49. **Efficient Use of Existing Structures (Paragraphs 119-120):** Use of existing masts, buildings, and structures for new electronic communications capability should be encouraged. There should be no blanket bans or undue restrictions, such as imposed minimum distances or prohibitions on new electronic communications infrastructure.
50. **Determining Applications (Paragraph 122):** Local planning authorities are required to determine applications solely on planning grounds. They must not attempt to restrict competition among service providers or challenge the need for electronic communications systems, ensuring an open and transparent process.
51. **Advertisements and Design (Paragraph 141):** The quality and character of places can be adversely affected by poorly sited and designed advertisements. The NPPF makes clear there is a separate consent process for the display of advertisements. Decisions should be based only on amenity and public safety, including cumulative impacts.

52. **Conservation and Heritage (Paragraph 200):** When assessing applications affecting conservation areas or listed buildings, planning authorities must require applicants to describe the significance of heritage assets affected. The detail provided should be proportionate to the importance of the asset and sufficient to understand the potential impact of the proposal.

Advertisement Control

53. The display of advertisements is subject to a separate consent process within the planning system⁵. This is set out in the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (hereafter known as the Regulations). Advertisements are controlled with reference to their effect on amenity and public safety only. Specific guidance relating to advertising developments and on the interpretation of the Regulations is contained within the PPG⁶.
54. The impact on visual amenity is assessed in light of the character of an area, which includes the nature and type of surrounding land uses and the existing built form within the particular locality where the proposed advertisement is to be displayed. It is the impact upon local character and any feature of interest that the proposed advertisement is appraised.
55. In terms of public safety, the central consideration is whether an advertisement would prevent individuals from exercising due care and attention. While advertising is designed to attract notice, it is widely accepted that roadside advertisements do not inherently cause distraction. In busy urban environments, commercial messaging is an expected and established feature of the streetscape.

The UK Digital Strategy

56. Published in March 2017, the UK Digital Strategy sets out the Government's commitment to unlocking the full potential of the digital sector — one of the UK's most vital and fast-growing industries. The ministerial foreword highlights the fundamental role of a world-class digital infrastructure in

⁵ Pursuant to Section 220 of the Town and Country Planning Act

⁶ Planning Practice Guidance – Advertisements (updated July 2019)

driving growth, while emphasising the importance of ensuring that digital progress benefits the entire nation — across all regions, sectors of the economy, and levels of society.

“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.”

57. The Strategy outlines a vision for delivering the infrastructure and skills required for a truly digital economy — helping businesses adopt new technologies, and closing the digital divide so that everyone can benefit from digital services. It affirms the wider societal value of this transformation:

“The Digital Strategy will deliver the first-class digital infrastructure and advanced skills base that businesses across the country need to be able to take advantage of digital tools. And it will close the digital divide - to ensure that everyone is able to access and use the digital services that could help them manage their lives, progress at work, improve their health and wellbeing, and connect to friends and family.”

Local Planning Policy

58. The statutory development plan for the area is the Kirklees Local Plan: Strategy and Policies (adopted 2019). This provides the overarching framework for growth and development across the district up to 2031..
59. The following policies of the Kirklees Local Plan are of particular relevance to the current proposal for the installation of a new communications kiosk (with ancillary advertisement and defibrillator) in Huddersfield and Dewsbury..

Design

60. Policy LP24 (Design) establishes that high-quality design will be expected in all new development. Proposals must respect and enhance the character of the townscape, heritage assets, and landscape; be visually attractive and responsive to local identity; and contribute to the creation of safe, accessible, and inclusive places. Development is also expected to achieve a

high standard of amenity for existing and future users and to minimise visual clutter within the public realm. The proposed kiosk has been carefully designed to be modern, functional, and of a scale appropriate to its urban context, thereby aligning with the objectives of LP24..

Heritage

61. Policy LP35 (Historic Environment) requires that development proposals affecting designated or non-designated heritage assets conserve or enhance their significance. In particular, the policy requires that the special interest of Conservation Areas is preserved, and that new development reinforces local distinctiveness and townscape quality. The policy acknowledges that sensitive, innovative design may be supported where it contributes positively to the historic environment. The proposal for the kiosk has been sensitively located and designed to ensure that it does not detract from the setting of nearby heritage assets or Conservation Areas, consistent with the requirements of LP35.

Infrastructure and Telecommunications

62. Policy LP4 (Providing Infrastructure) establishes that new development must contribute to the provision of essential and desirable infrastructure, including telecommunications, in a proportionate and timely manner. The Council identifies digital connectivity as a core component of sustainable growth.
63. Policy LP10 (Supporting the Rural Economy) and the Local Plan's wider economic strategy emphasise that investment in modern telecommunications is essential for competitiveness, accessibility, and reducing the need to travel. The proposed kiosks, by providing enhanced connectivity and integrating a community defibrillator, directly support these strategic aims and provide tangible public benefits..

Place Shaping – Huddersfield and Dewsbury

64. The Local Plan includes specific **Place Shaping Statements** for different parts of the district.

65. Huddersfield is identified as the district's main cultural and leisure hub, with opportunities to enhance its independent retail, digital infrastructure and public realm. The Local Plan prioritises revitalising the town centre through investment in next-generation connectivity, high-quality public spaces, and regeneration of key sites. The proposed kiosk supports these aims by providing modern communications infrastructure in an accessible town centre location, consistent with the regeneration strategy.

66. Dewsbury is identified within the Local Plan as a strategic regeneration priority through the North Kirklees Growth Zone, with objectives to transform the town centre, improve connectivity, and enhance its heritage and townscape. The Place Shaping Statement for Dewsbury emphasises improving the quality of the public realm, tackling vacancy rates, and providing new infrastructure to attract investment. The kiosk will make a modest but meaningful contribution to these objectives by enhancing connectivity, supporting public health through its integrated defibrillator, and improving the quality and resilience of town centre services..

PLANNING ASSESSMENT

67. In assessing the application, the traditional planning considerations apply⁷, as well as those set out in the Town and Country Planning (Control of Advertisements) (England) 2007. The latter reiterates that advertisements are to be controlled only with regard to their effect on amenity and public safety, and any other material considerations.

68. Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that special regard is had to the desirability of preserving a listed building or its setting. The Framework requires the particular significance of any heritage asset that may be affected by a proposal, including development affecting its setting, to be taken into account when considering the impact of a proposal.

69. Taken as a whole, therefore, the main planning considerations are whether the proposed kiosk, by virtue of its design, siting and use, will preserve or enhance the character and setting of the wider street scene and safeguard pedestrian movement and safety.

Site Assessments

70. Each site is considered on its own merits, with assessments addressing both the kiosk and the associated advertisement display.

Site 1: Opposite 10 Foundry Street, Dewsbury

71. The proposed kiosk is to be located on the western side of Foundry Street, opposite No. 10, within Dewsbury town centre. The site lies inside the designated Primary Shopping Area and immediately adjacent to the Primary Shopping Frontage, placing it at the commercial heart of Dewsbury. It also falls within the Dewsbury Town Centre Conservation Area, an area subject to active regeneration initiatives under the North Kirklees Growth Zone.

72. The surrounding built form is defined by predominantly three-storey Victorian commercial blocks constructed in local stone, with active retail uses at ground floor. The elevations retain strong vertical proportions and

⁷ Section 38(6) of the Planning and Compulsory Purchase Act 2004

decorative detailing characteristic of Dewsbury's textile heritage, though interspersed with modernised shopfronts. The consistent commercial activity reinforces the importance of Foundry Street as a key shopping and pedestrian route.

73. The existing streetscape incorporates a variety of street furniture — including benches, planters, bollards and advertising columns — arranged in a line along the western footway. This creates a varied yet coherent rhythm of vertical and low-level features. The proposed kiosk will follow this established line of street furniture, integrating seamlessly within the pattern of existing urban elements and avoiding visual intrusion into the wider street scene.
74. The kiosk has been designed with a slender profile, open sides and a dark heritage-inspired finish. These attributes reduce its overall massing and allow it to sit comfortably against the backdrop of traditional retail terraces without detracting from their architectural significance. The modest scale and restrained detailing ensure that the kiosk is read as a piece of functional street furniture rather than a competing focal point.
75. An unobstructed pedestrian route of over 2 metres will be retained along the western footway, safeguarding pedestrian flows in this busy shopping location and meeting accessibility standards.
76. The kiosk will also deliver tangible public benefits, including free-to-use telephony, an integrated community defibrillator, and digital wayfinding. These facilities directly enhance the civic amenity of the Primary Shopping Area and align with wider objectives to improve town centre resilience and vitality.

Advertisement Amenity and Public Safety

77. The integral digital display will be located on the southern elevation of the kiosk, facing toward the retail core.
78. From an amenity perspective, the advertisement will be read in the context of a busy commercial street already characterised by illuminated signage, shopfront lighting, and occasional advertising columns. Its integration within the kiosk and alignment with the existing furniture line ensures it does not introduce clutter or discordance within the streetscape.

79. The advertisement will operate in a static format, changing no more frequently than once every 10 seconds, with smooth fade transitions and no flashing or moving content. Illumination levels will comply with the thresholds recommended by the Institute of Lighting Professionals (PLG05/2023), ensuring the display preserves visual amenity within the conservation area.
80. Foundry Street accommodates low-speed vehicle movement with high pedestrian priority. The static nature of the display, combined with luminance controls and the south-facing orientation, ensures that it does not pose a distraction or safety hazard to drivers, cyclists, or pedestrians.
81. Taken as a whole, the kiosk and associated advertisement represent a well-integrated, proportionate intervention. The design respects the character and setting of Dewsbury's Primary Shopping Area and Conservation Area, while delivering meaningful public benefit in line with local and national planning policy.

Site 2: Outside 17–17A King Street, Huddersfield

82. The proposed kiosk is to be located on the northern side of King Street, directly outside Nos. 17–17A, on the southern fringe of the Huddersfield Town Centre Conservation Area. This is a transitional location at the edge of the conservation boundary, where the historic core meets more modern retail and service development. The site also sits within the Primary Shopping Area, adjacent to designated Primary Shopping Frontages, confirming its importance in the commercial structure of the town centre.
83. King Street is a pedestrianised retail street characterised by a blend of traditional stone retail terraces and modernised shop units. The upper floors of many buildings retain classical proportions and detailing, while shopfronts at ground level vary in style and material, reflecting the evolving commercial role of the street. This mixed context demonstrates the transitional quality of this part of King Street, marking it as a fringe location rather than the more sensitive core of the Conservation Area.
84. The surrounding public realm accommodates a variety of street furniture — including bollards, benches, planters, lighting columns, and signage — arranged to support pedestrian activity. The kiosk will be sited so that it

follows the established line of street furniture, ensuring that it reads as part of a coherent urban arrangement rather than as a standalone intrusion. In this way, the proposal avoids the sense of clutter or disjointedness sometimes associated with more ad hoc interventions.

85. The kiosk itself has been refined in design compared to earlier models of similar infrastructure. Its slender vertical profile, open sides, and heritage-inspired dark finish give it a more transparent and recessive appearance, ensuring that it does not compete visually with building frontages. Its restrained detailing and compact proportions allow it to sit comfortably within the streetscape, providing a contemporary but sympathetic addition at this conservation fringe.

86. A clear pedestrian corridor of over 2 metres will be maintained along the footway, preserving accessibility and ease of movement in this pedestrian-priority location.

87. The kiosk will deliver tangible civic benefits that strengthen Huddersfield town centre's resilience: free-to-use telephony, a community defibrillator, and interactive digital wayfinding. These facilities support both public health and economic vitality, enhancing the value of this transitional shopping area as a gateway into the historic core.

Advertisement Amenity and Public Safety

88. The integrated digital display will be positioned on the western elevation, facing toward the principal pedestrian flow along King Street.

89. From an amenity perspective, the advertisement will be read in the context of a busy retail street already containing a range of illuminated signage and active shopfront displays. Its location on the fringe of the Conservation Area further reduces sensitivity when compared to core heritage frontages. By aligning with the rhythm of existing commercial activity, the display will appear as part of the evolving retail character of the street.

90. It is also relevant that digital advertising installations of comparable scale and format are already present nearby. On the intersecting New Street, consent was granted under application ref. 2015/92185 for double-sided digital units displaying sequential advertisements. These continue to operate today and are partly located within the Conservation Area

boundary. Their presence demonstrates that such advertising is not novel in this town centre context, and that appropriately designed and controlled digital formats can sit acceptably within or adjacent to heritage settings without causing harm.

91. The advertisement on the proposed kiosk will remain static, with images changing no more than once every 10 seconds, using smooth fade transitions and no flashing or moving content. Illumination levels will be controlled in accordance with the Institute of Lighting Professionals' PLG05 (2023) guidance. These safeguards ensure that the display is legible but not intrusive, preserving the character and appearance of the Conservation Area.
92. Public safety will not be compromised. King Street is pedestrianised, with vehicular access limited to servicing at restricted times. The static, low-glare display will not distract users or conflict with pedestrian movement.
93. Taken as a whole, the proposed advertisement will form a logical continuation of the accepted commercial pattern already established nearby. By drawing on precedent and operating within tightly controlled parameters, the display will enhance town centre vitality while respecting both visual amenity and highway safety.

Site 3: Outside 30 John William Street, Huddersfield

94. The proposed kiosk is to be located on the western side of John William Street, outside No. 30, within Huddersfield town centre and inside the Huddersfield Town Centre Conservation Area. The site forms part of a key commercial thoroughfare linking Huddersfield railway station with the wider retail and civic core, and serves as one of the town's principal pedestrian and transport corridors.
95. The built form along John William Street is defined by robust Victorian stone buildings, typically three to four storeys in height, with strong vertical proportions, arched openings and decorative detailing. The street's significance lies in its formality and architectural quality, but at ground level the character is more varied, with modern shopfronts, signage and commercial activity reflecting its function as a major retail and transport route.

96. The street is notably wide, accommodating a central carriageway with bus and taxi movements, together with generous pavements on either side. The public realm already includes bus shelters, lighting columns, waste bins and traffic signage, contributing to an active urban environment. The proposed kiosk will be sited in alignment with the existing line of street furniture along the western footway. This ensures it integrates within the established rhythm of vertical elements, avoiding the perception of clutter and maintaining an ordered streetscape.

97. The kiosk is designed with a slender, open-sided profile and a dark, heritage-inspired finish. These attributes reduce its massing and lend a recessive appearance, ensuring it does not compete visually with the robust façades of John William Street. The design quality and restrained proportions avoid the bulk and incongruity sometimes associated with modern street structures, allowing the kiosk to read as a functional, modest addition.

98. Importantly, the kiosk is not located within the open, formal setting of St George's Square, where views of the Grade I listed railway station form the dominant townscape feature. Instead, it sits further south along John William Street in a busier commercial frontage, ensuring that the primacy of the station and its setting is preserved. The kiosk will not intrude into the open civic square or disrupt key axial views to the station façade.

99. A clear pedestrian route of more than 2 metres will remain unobstructed, ensuring the heavy pedestrian flows between the station and the town centre are not impeded and accessibility standards are upheld.

100. The kiosk will deliver tangible public benefits in this transport gateway location, including free-to-use telephony, a community defibrillator, and digital wayfinding to assist visitors navigating from the station to retail, cultural and leisure destinations. These civic functions strengthen the resilience and accessibility of Huddersfield town centre.

Advertisement Amenity and Public Safety

101. The integrated digital display will be positioned on the northern elevation, facing along John William Street toward the principal pedestrian and vehicle flows.

102. From an amenity perspective, the display will be viewed within a busy, mixed commercial and transport environment that already contains illuminated retail signage, bus shelter panels and modern shopfront lighting. Against this backdrop, the advertisement will not appear novel or intrusive, but as a continuation of the existing commercial pattern.
103. The display will operate in a static format, with images changing no more than once every 10 seconds, using smooth fade transitions and no flashing or moving imagery. Illumination will comply with the thresholds set out by the Institute of Lighting Professionals' PLG05 (2023), ensuring that the display is legible but not visually overbearing.
104. In terms of public safety, vehicle speeds are naturally moderated by the urban layout and pedestrian priority. The static, low-glare display avoids any risk of distraction to bus drivers, taxi operators, cyclists or pedestrians.
105. Taken as a whole, the kiosk and associated advertisement represent a measured, proportionate addition to John William Street. The siting ensures integration within the existing street furniture pattern, avoids intrusion into the open civic space of St George's Square, and preserves the setting of the Grade I listed station. The design is sympathetic, the impact limited, and the public benefits substantial, ensuring the proposal accords with the objectives of the development plan and national policy.

Site 4: Outside 36 New Street, Huddersfield

106. The proposed kiosk is to be located outside No. 36 New Street, within the Huddersfield Town Centre Conservation Area. This is a prominent retail thoroughfare forming part of the Primary Shopping Area, with consistently high pedestrian footfall and proximity to the Kingsgate Shopping Centre. New Street is one of the town's principal shopping streets, characterised by a mix of historic stone retail terraces and more modern commercial infill.
107. The street is notably wide, with generous pavements that accommodate both high pedestrian flows and a varied pattern of street furniture, including benches, bollards, lighting columns, bins, planters and advertising columns. This contributes to a busy and vibrant commercial character that reflects its primary shopping role.

108. The proposed kiosk will be aligned with the established line of street furniture along its central axis, integrating neatly into the rhythm of vertical elements already present. Its design — featuring a slender vertical profile, open sides, and a dark heritage-inspired finish — ensures that it is modest and recessive in appearance. Against the backdrop of three- to four-storey commercial frontages, the kiosk will read as a functional, contemporary item of street furniture rather than as an intrusive or dominant feature.
109. A minimum unobstructed footway width of over 2 metres will be retained, ensuring pedestrian flows in this busy location are not impeded and accessibility standards are upheld.
110. In addition to its visual integration, the kiosk will deliver public benefits including free-to-use telephony, an integrated community defibrillator, and digital wayfinding. These services strengthen the resilience and amenity of Huddersfield town centre, consistent with wider regeneration objectives.

Advertisement Amenity and Public Safety

111. The kiosk incorporates an integral digital display on its elevation facing the primary flow of pedestrian movement along New Street.
112. In terms of amenity, digital advertising installations are not novel in this location. Along this stretch of New Street, the Council has granted consents for sequential double-sided digital displays at 22 New Street (ref. 2019/91052) and 49–59 New Street (ref. 2019/91060). These displays remain in operation and are partly located within the Conservation Area. Their presence demonstrates that modern digital advertising, when carefully controlled, is an accepted and integrated feature of this town centre streetscape.
113. The proposed display will follow the same established parameters: remaining static, with images changing no more than once every 10 seconds, using smooth fade transitions and no flashing or moving content. Illumination will be capped in accordance with the thresholds recommended by the Institute of Lighting Professionals (PLG05, 2023), ensuring the advertisement is visible but not intrusive within the Conservation Area.

114. The surrounding townscape is already lively, with illuminated signage, fascia lighting, shopfronts and modern retail activity. The advertisement will appear as part of this commercial character rather than as a discordant addition.
115. Public safety will not be compromised. New Street is a pedestrian-priority environment, with limited vehicle access and naturally low speeds. The static, low-glare format ensures legibility for passers-by without distraction to drivers or cyclists.
116. Taken together, the kiosk and associated advertisement represent a well-integrated, proportionate intervention. By aligning with the existing street furniture pattern and reflecting precedents already consented along New Street, the proposal will preserve the character and appearance of the Conservation Area, respect pedestrian movement, and deliver meaningful public benefit in line with Local Plan objectives.

Site 5: Outside 112–118 New Street, Huddersfield

117. The proposed kiosk is to be located in a central location the footway outside Nos. 112–118 New Street, within the Huddersfield Town Centre Conservation Area and forming part of the Primary Shopping Area. This section of New Street lies toward the southern end of the commercial core and retains a consistent retail character, with active ground floor frontages and a mix of traditional stone buildings interspersed with later infill.
118. The public realm along this section is broad, with generous pavement widths that accommodate high pedestrian flows. Existing street furniture includes bollards, bins, planters and lighting columns, producing a streetscape typical of a busy shopping destination. The kiosk will follow the existing line of vertical street furniture and integrate with the prevailing urban pattern.
119. The kiosk has been designed with slender proportions, open sides, and a dark heritage-inspired finish, which reduces its apparent bulk and allows it to sit comfortably against the backdrop of varied commercial frontages. Its modest scale and recessive appearance mean it will be read as part of the functional urban furniture rather than as a visually dominant feature.

120. A minimum unobstructed pedestrian width of more than 2 metres will be maintained at all times, ensuring accessibility standards are met and that pedestrian flows remain unimpeded, even during peak shopping hours.
121. Beyond visual considerations, the kiosk offers tangible civic benefits: free-to-use telephony, an integrated defibrillator, and digital wayfinding. These functions enhance public safety and amenity, contributing positively to the town centre's infrastructure and resilience.

Advertisement Amenity and Public Safety

122. The kiosk incorporates an integrated digital display on its elevation facing the pedestrian and retail flows along New Street.
123. In amenity terms, the proposal will be viewed within a busy commercial environment already containing illuminated signage and modern shopfront treatments. Along New Street itself, digital advertisement consents have already been granted and implemented — including at 22 New Street (ref. 2019/91052) and 49–59 New Street (ref. 2019/91060). These established precedents demonstrate that digital advertising of this scale and format has been judged acceptable within the Conservation Area context.
124. The advertisement will operate in a static format, with images changing no more frequently than once every 10 seconds, using smooth fade transitions without flashing or moving content. Illumination levels will adhere to the Institute of Lighting Professionals' PLG05 (2023) standards, ensuring that visual amenity is preserved within the Conservation Area.
125. Public safety considerations have been fully addressed. This section of New Street is pedestrian-priority, with limited vehicular access. The static and low-glare design of the display ensures it is easily legible for pedestrians without causing distraction to drivers or cyclists.
126. Taken as a whole, the kiosk and its associated advertisement will form a context-sensitive addition to the town centre. By aligning with the existing street furniture pattern, respecting the generous scale of the public realm, and reflecting digital formats already approved along New Street, the proposal will preserve the character and appearance of the Huddersfield Town Centre Conservation Area while delivering meaningful public benefits..

SUMMARY AND CONCLUSION

127. The applications seek consent for the installation of five modern communications kiosks across Huddersfield and Dewsbury town centres, each incorporating free-to-use telephony, an integrated defibrillator, digital wayfinding, and an ancillary digital advertisement panel.
128. The proposed kiosks represent a contemporary evolution of traditional public telephone infrastructure, designed to deliver civic value while meeting modern expectations of connectivity and public safety. Their compact scale, dark heritage-inspired finish, and slender proportions ensure they integrate with surrounding street furniture and commercial frontages without visual intrusion.
129. Each site has been assessed individually, taking into account the relevant policy framework, the statutory duties under the Planning (Listed Buildings and Conservation Areas) Act 1990, and the particular characteristics of Huddersfield and Dewsbury's urban fabric. The site-specific analyses confirm that the kiosks will sit comfortably within their respective contexts, safeguarding pedestrian movement, maintaining accessibility standards, and preserving the character and appearance of the Huddersfield Town Centre Conservation Area and other designated heritage assets.
130. With regard to the advertising element, the associated digital displays will operate in a controlled and proportionate manner. Static images will change no more frequently than every 10 seconds, with smooth fade transitions, no flashing or moving content, and illumination levels strictly in line with the Institute of Lighting Professionals' PLG05 (2023) guidance. These safeguards ensure that the advertisements respect the amenity of the conservation area and do not compromise public safety.
131. Importantly, digital advertising of this form is not without precedent in Huddersfield town centre. Existing consents, including installations on New Street, demonstrate that modern advertising can be successfully integrated within the Conservation Area and Primary Shopping Area when subject to appropriate design and operational controls. The current proposals follow the same model, aligning with established patterns of commercial activity.

132. The proposals are consistent with the policies of the Kirklees Local Plan, including:

- LP24 (Design), by providing high-quality urban infrastructure that integrates with local character and safeguards accessibility;
- LP35 (Historic Environment), by preserving the character and appearance of conservation areas and respecting the setting of listed buildings; and
- LP47 & LP48 (Community Infrastructure and Telecommunications), by delivering modern communication facilities that enhance resilience and support social well-being.

133. Taken together, the kiosks offer a measured, proportionate and beneficial intervention in the public realm. They provide demonstrable public benefits — including emergency equipment, improved connectivity, and enhanced wayfinding — while ensuring no harm arises to amenity, heritage significance, or public safety.

134. The proposals therefore accord with the statutory requirements of Sections 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, the policies of the Kirklees Local Plan, and the guidance of the National Planning Policy Framework.

135. For these reasons, it is respectfully submitted that the applications should be approved.

NWP