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Planning Supporting Statement

Our Ref.	YRK-21
Street Hub Address	Footpath outside, Cleckheaton Local, Cleckheaton
Postcode	BD19 3RU
National Grid Reference	E: 419102 N: 425264
Project Type	Installation
Conservation Area	N/A
Statutory Listed Buildings	N/A

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Executive Summary

The proposal for the '*Installation of 1No. BT Street Hub Unit and associated advertisement panels on either side of the unit'* is considered appropriate having regard to the current planning framework and surrounding context.

The Street Hub has a slender, contemporary profile, considerably reduced in bulk compared to existing phone boxes. The site is considered contextually appropriate, strategically located within a commercial setting, and will not adversely impact the character, appearance or amenity of the streetscene.

The detailed assessment below demonstrates that the proposal:

- Achieves an appropriate response to relevant planning policy;
- Provides a modern solution to pertinent telecommunications infrastructure requirements;
- Is appropriately designed and dimensioned to respond to its immediate and surrounding context;
- Delivers a myriad of public benefits;
- Maintains and ensures the safety of pedestrians and vehicles through strategic siting and compliant design;
- Improves the public realm through the removal of existing, often worn down, BT payphones;
- Incorporates measures to help manage crime and anti-social behaviour.

Rev	Originator	Approved	Date
1	Alice McColl	Jack Lawrence	August 2026

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1. Introduction

1.1 Overview

This Supporting Statement has been prepared by Telent on behalf of *BT Group plc* ('the applicant').

The statement has been prepared in support of the planning application made to the Council for the installation of a 'Street Hub' and 2No. digital illuminated screens (one to each side of the unit) at the footpath outside Cleckheaton Local, Cleckheaton BD19 3RU (E: 419102 N: 425264).

This application is made under the Town and Country Planning (Development Management Procedure) (England) Regulations 2015 and express advertisement consent under the Town and Country Planning (Control of Advertisement (England) Regulations 2007. The right to install, operate and maintain communication apparatus is granted through Section 106 of the Communication Act 2003, due to BT's right as a Code System Operator.

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

Specifically, this report has been informed by:

- A review of the relevant LPA planning policy;
- The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (as amended);
- The National Planning Policy Framework (NPPF); and
- A detailed inspection of the site and surrounding area.

This planning statement is accompanied by the following supporting documents:

- Planning Drawings;
- Cover Letter;
- Photomontage;
- BT Street Hub Product Statement V.2 prepared by *BT Group plc;*
- Street Hub Dimensioned Elevations A3 - STH-001 prepared by *BT Group;*
- BT Street Hubs Anti-Social Behaviour Management Plan prepared by *BT Group;*
- BT Noise Management Plan prepared by *BT Group plc*; and
- Professional Lighting Guidance – 2023 prepared by *Institution of Lighting Professionals (ILP).*

Overall, it's submitted that the proposal is consistent with the policy objectives and the intent of the relevant planning policy and presents an appropriate design response to the site and the broader context of the surrounding area.

1.2 Purpose of Street Hubs

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

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

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

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

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

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

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

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

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

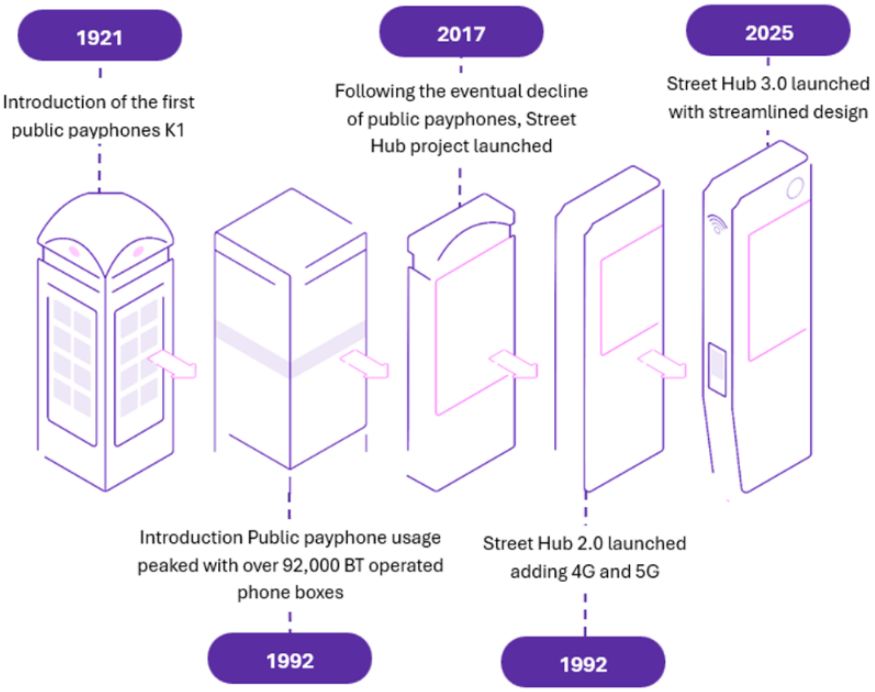


***Figure 1** – Evolution of BT telephone kiosk estate*

1.3 The Importance of Mobile Connectivity

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

1.4 UK Government Policy on Mobile Infrastructure Deployment

The UK government has identified the need for greater investment in mobile infrastructure to increase the widespread availability and capacity of mobile voice and data networks. The following quote is from the Department for Culture, Media and Sport Group's (DCMS), May 2016.

> *"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". (Quote from Department for Culture, Media and Sport Group's, DCMS, May 2016.*

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

- Coverage commitments in the 4G LTE spectrum awarded to Telefonica O_2 (February 2013) to deliver mobile broadband with 98% indoor premises coverage by the end of 2017
- National commitment by all four MNOs (December 2014) to deliver 90% geographic coverage by 2017
- Mobile Infrastructure Project (MIP) – investment by DCMS of up to £150m (to March 2016) in towers to deliver connectivity in complete mobile not-spots.
- Changes to the Permitted Development rights afforded to communications code operators (such as WIG) to allow new networks to be rolled-out more efficiently.
- Changes to the Electronic Communications to Code (December 2017) to allow mobile operators to more easily roll-out new communications infrastructure.

Digital connectivity in 2024 is now considered to be a utility, and modern life is increasingly impossible without it. Connectivity drives productivity and innovation and is the physical underpinning of a digital nation. Being connected is fundamental to the success in our modern world and Street Hub provides a cost-free way for communities to get online and take advantage of available opportunities. The Government has committed that every individual and every business should have the skills and

confidence to seize the opportunities of digital technology and have easy access to high-quality internet wherever they live, work, travel or learn.

1.5 National Support for Modern Communications

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

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

2. Proposed Development

2.1 Site and Proposed Development

Proposal

The application site comprises section of footpath outside, Cleckheaton Local, Cleckheaton. The unit is positioned on a wide section of pedestrian footpath in line with existing on-street furniture. Specifically, the proposal seeks approval for the:

'Installation of 1No. BT Street Hub Unit and associated advertisement panels on either side of the unit'

Please refer section 2.2 of this report and the following supporting documents for full details of the design, dimensions, materials and illumination of the Stret Hub unit:

- BT Street Hub Product Statement V.2 prepared by BT Group plc;
- Street Hub Dimensioned Elevations A3 - STH-001 prepared by BT Group; and
- Planning Drawings.

Site and Surrounding Area

The north- site is located on a wide portion of pedestrian footpath to the west of Dewsbury Road, of which is a multi-lane carriageway servicing north and south flowing traffic. This portion of footpath is currently occupied by existing street furniture including planter boxes, temporary hoarding signs and lamp posts. The unit is proposed to align with the existing street furniture, kerbside on the footway. Dewsbury Road is enclosed by multi-storey buildings with ground floor commercial tenancies. To the east, across Dewsbury Road is the entry/exit point for Brooke Street.

The surrounding area is categorised as a typical local commercial area. The advertising theme includes fascia advertising signs associated with commercial shopfronts, which vary in colour, illumination and materiality.

Having regard to the surrounding heritage context, the site is not located within a Conservation Area, or nearby any listed buildings. It's acknowledged that a listed statue is located to the south, however, the unit maintains an appropriate degree of separation and is out of view from this statue.

The position of the site is shown on the aerial image below:

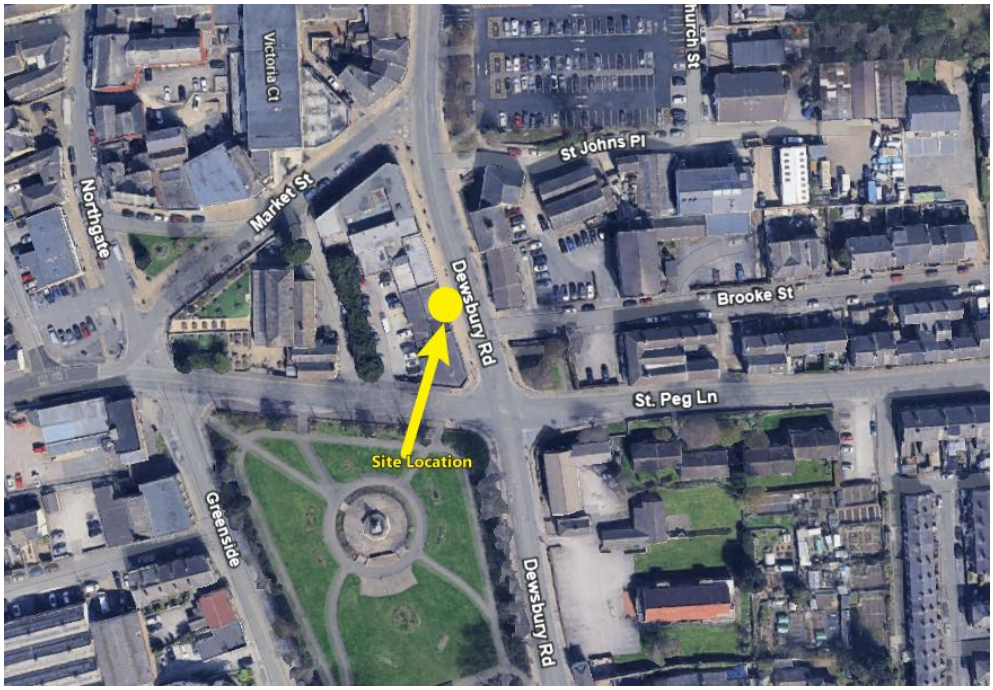


***Figure 2** – Aerial view of the site*

The below image, sourced from taken when surveying the site, shows the street view context and general location of the proposed Street Hub.



***Figure 3** – Street view of the site*

Existing Kiosk Removal

The proposal includes the removal of 1No. existing BT phone box on the footpath opposite, 105 Bradford Rd, Cleckheaton. The removal of this phone box will assist in

the decluttering of footpaths in the wider area and enhance the broader area's visual amenity. Details of the kiosk proposed to be removed is provided in the table below.

Proposed Kiosk Removal
Footpath opposite, 105 Bradford Rd, Cleckheaton BD19 3PY


***Figure 4** – BT Kiosk to be Removed*

The proposal would see the installation of a single Street Hub unit to be located on the section of footpath outside, Cleckheaton Local, Cleckheaton BD19 3RU (E: 419102 N: 425264). It should be noted that proposals for the installation of Street Hubs will see with it the removal of existing, outdated and worn-down BT payphones, where possible, at no extra cost to the council. This would help in achieving the advancement and decluttering of the council's streetscapes, in line with the UK Digital Strategy, the National Planning Policy Framework, and the relevant Development Plan for the area.

2.2 Street Hub Design and Dimensions

Measurements

The Street Hub is designed with a height to maximise the Wi-Fi range without dominating the street and includes a narrow base to limit the footprint while ensuring access to wheelchair users.

Specifically, the measurements are as follows:

- Height: 2.986m
- Width: 1.236m
- Depth: 0.35m
- Screen Dimensions: 95cm wide x 167cm high (75 inch in portrait)
- Screen Area: 1.586m^2

Materials and Finishes

The Street Hub is designed with high-quality materials to ensure maintainability and durability. The materials include the following:

- Galvanised mild steel structure, powder coated external grade stainless steel or complete aluminium design;
- Painted powder coated cladding – attractive, durable, easy to service, and cooling;
- Displays glazed with anti-glare glass to reduce reflection and increase image quality; and
- RF transparent radio compartment for small cell.

Illumination

The proposed usage for the screens has been set in accordance with Transport for London's (TfL) policy document 'Guidance for Digital Roadside Advertising and Proposed Best Practice – 2013'. The technical specification of the two digital display screens is as follows.

- Screen Panel Type: LCD (with LED backlighting)
- Resolution: 3840 x 2160 UHD
- Maximum Daytime Brightness: 2500 cd/m² (Typ.)
- Maximum Night-time Brightness: 600 cd/m2 (Typ.)

Noise Management

Street Hubs provide free phone calls via a speaker and microphone system, with controllable volume levels designed to support effective communication while respecting local community amenity and expectations. The Street Hub Volume controls include:

Daytime (07:00–21:00)	Starts at 50% volume, adjustable to the user's preference.
Night-time (21:00–07:00)	Volume is capped at 60% maximum.
999 Calls	Volume automatically increases to 100% to ensure clear communication with emergency services but can be lowered at the user's request.

Energy Efficiency

All Street Hubs Electricity consumption is matched with 100% renewable UK energy sources, with energy efficiency prioritized throughout the design process. This is most evident in the following features:

- A state-of-the-art LED-backlit LCD screen that consumes approximately 60% less power than Cold Cathode Fluorescent Tubes
- Screen filters reflect light reducing the need for high power, noisy cooling systems typically seen in competing solutions

- Industrial-grade components designed to function at high temperatures lower the need for cooling without compromising performance
- Passive design for cooling, i.e. aluminium casing for better thermal dissipation
- High-efficiency power supplies providing 80% or better efficiency, compared to 65-70% of typical components.

Please refer to BT Street Hub Product Statement V.2, Street Hub Dimensioned Elevations A3 - STH-001, BT Noise Management Plan prepared by *BT Group plc* and the relevant Planning Drawings for full details of the design and dimensions of the Street Hub.

2.3 Relevant Planning History

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

2.4 Kirklees Council Rollout

In terms of roll-out, where possible and practicable, it is proposed to install Street Hubs either as a direct replacement for existing BT payphones, or in very close proximity to such payphones. As these existing payphones will be removed it should minimise impact on existing streetscenes by reducing street clutter, or at least not adding to it at particular locations. Whereby a new Street Hub is proposed, BT payphones will be removed, again where possible and practicable from the same streetscape, or same visual envelope, again to try to minimise impact on visual clutter. The proposed Street Hub's will help to deliver a comprehensive network of connectivity within the borough whilst decluttering the Council's streetscenes.

3. Public Benefits

Street Hubs deliver a myriad of public benefits, providing Councils with smart, sustainable and cost-free infrastructure that supports digital connectivity, economic development, public safety and community wellbeing. Evolving BT's long-established payphone estate, the proposed Street Hub provides a modern solution designed to create smarter, safer and more connected places that meets the demands of modern, digital cities.

Please refer to **BT Street Hub Product Statement V.2** prepared by *BT Group plc*, for full details of the public benefits and contributions to the community offered by the Street Hub unit, which have been summarised below:

- 876 hours of **free council advertising** per unit per year
- **Community notice board** with over 1,000 hours of content per year – the Street Hub team can work with local groups to promote events and activities
- Free and/or discounted **advertising for local business groups**
- Recent press releases highlight that **BT gifted up to £7.5m of free advertising space to local businesses** via its Street Hub units in 2023-24 as the new units are rolled out to new locations across the UK, whereby BT (in conjunction with the LPAs) contacted local businesses and the public in these areas in order to encourage them to nominate local firms who could benefit from the offer.
- This came as a new BT study found that more than 60 per cent of small businesses agree that local advertising would help to increase awareness of their business, with 40 per cent saying it would encourage more people to shop at their local high street. However, almost half (49 per cent) said that cost was a major obstacle to them investing in local Out of Home (OOH) advertising.
- **Free ultrafast public Wi-Fi and free calls**
- Secure **device charging**
- **Accessible interactive tablet** providing access to 999, local council services, local weather information, maps and one touch connection to four national charities for support.
- **Boost in 4G and 5G** improving coverage and capacity.
- **Emergency messaging** – back-end systems allow control of screens through the head office. Groups such as the police can quickly display emergency and community awareness messaging.

4. Planning Policy

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

4.1 National Planning Policy and Guidance

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

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

PART I – Section 3
Powers to be exercised in the interests of amenity and public safety

3.— (1) A local planning authority shall exercise its powers under these Regulations in the interests of amenity and public safety, taking into account—
(a) the provisions of the development plan, so far as they are material; and
(b) any other relevant factors.

(2) Without prejudice to the generality of paragraph (1)(b)—
(a) factors relevant to amenity include the general characteristics of the locality, including the presence of any feature of historic, architectural, cultural or similar interest;
(b) factors relevant to public safety include—
(i) the safety of persons using any highway, railway, waterway, dock, harbour or aerodrome (civil or military);
(ii) whether the display of the advertisement in question is likely to obscure, or hinder the ready interpretation of, any traffic sign, railway signal or aid to navigation by water or air;
(iii) whether the display of the advertisement in question is likely to hinder the operation of any device used for the purpose of security or surveillance or for measuring the speed of any vehicle.

(3) In taking account of factors relevant to amenity, the local planning authority may, if it thinks fit, disregard any advertisement that is being displayed.

(4) Unless it appears to the local planning authority to be required in the interests of amenity or public safety, an express consent for the display of

advertisements shall not contain any limitation or restriction relating to the subject matter, content or design of what is to be displayed.

National Planning Policy Framework (NPPF) (August 2026)

Planning policy at the national level is principally provided by the National Planning Policy Framework (NPPF). The NPPF sets out the Government's planning policies for plan-making and for making decisions on development proposals in England and is a material consideration in the determination of planning applications. The current Framework was published on 17 August 2026 and replaces the previous NPPF published in December 2024.

The NPPF establishes a positive framework for the planning system and identifies sustainable development as a central objective of plan-making and decision-taking. The Framework recognises the importance of infrastructure in supporting sustainable growth and provides specific national policy support for the expansion and upgrading of telecommunications infrastructure.

In this regard the Framework can be summarised as follows:

- Advanced, high quality and reliable communications are essential to meet changing technological, social, business and security requirements;
- Planning policy should support the expansion and upgrading of telecommunications infrastructure, including next generation wireless technologies such as standalone 5G, gigabit-capable broadband and supporting infrastructure;
- Substantial weight should be given to the benefits of maintaining or improving network coverage, capacity, reliability and resilience;
- Existing telecommunications masts, buildings and other structures should be used where appropriate, including through the **upgrading or replacement of existing infrastructure**, unless there is no reasonable opportunity to do so having regard to consumer needs, efficient network operation and reasonable capacity for future expansion;
- Telecommunications infrastructure should be sited and designed to minimise visual impact, particularly where a new site or structure is proposed, whilst taking account of the operational requirements of the network;
- Telecommunications development should not result in cumulative exposure to non-ionising radiation exceeding the relevant International Commission guidelines;
- Local planning authorities should not require minimum distances to be maintained between telecommunications infrastructure and other development;
- Local planning authorities should not question the need for the expansion or upgrading of telecommunications networks or seek to prevent competition between different operators; and
- Relevant telecommunications proposals should be supported by proportionate information addressing matters including consultation, site selection and compliance with the relevant technical and health safeguards.

Sustainable Development

Chapter 4 of the NPPF, entitled 'Achieving sustainable development', establishes the national policy framework for sustainable growth and development. The objective of the policies of this chapter is:

> *"to meet development needs through sustainable patterns of development, including by maximising the potential for growth on suitable land within settlements, enabling development which will support the rural economy, rural communities and the provision of infrastructure, and limiting development away from settlements to help safeguard the intrinsic character and beauty of the countryside."*

The relevant National decision-making policies under Chapter 4 include:

S3: Presumption in favour of sustainable development

1. *Decisions on development proposals should apply a presumption in favour of sustainable development. This means:*

    a. *Policy S4 in this Framework should be applied when considering development proposals within settlements;*
    b. *Outside settlements, policy S5 should be applied; and*
    c. *In all locations, development proposals that accord with both an up-to-date development plan and the decision-making policies in this Framework should be approved without delay.*

Telecommunications Infrastructure

Chapter 9 of the NPPF, entitled 'Supporting high quality communications', establishes the national policy framework for telecommunications infrastructure. The objective of the policies of this chapter is:

> *"to support the expansion and upgrading of telecommunications infrastructure, in ways which limit an unnecessary proliferation of equipment and respect important environmental safeguards. Advanced, high quality and reliable communications are essential to meet changing technological, social, business and security requirements (including through delivering coverage of higher quality standalone 5G in all populated areas by 2030, and nationwide gigabit-capable broadband by 2032)."*

The relevant National decision-making policies under Chapter 9 include:

CO1: Proposals for telecommunications infrastructure

1. *In considering proposals for the expansion or upgrading of electronic telecommunications networks, substantial weight should be given to the benefits of maintaining or improving network coverage, capacity, reliability and resilience, including where significant improvements are required such as along rail corridors.*

This includes, but is not limited to, providing for next generation wireless technologies (such as standalone 5G), gigabit-capable broadband connections and supporting infrastructure such as fibre exchanges. Proposals for such development should:

a. *Use existing masts, buildings and other structures already employed for this purpose, upgrade, or replace existing infrastructure, unless there is no reasonable opportunity to do so (taking into consideration meeting consumer needs, the efficient operation of the network and providing reasonable capacity for future expansion);*
b. *Be sited and designed to minimise the visual impact of the proposals, especially in situations where a new site or structure is proposed, so far as practical taking into account its operational requirements;*
c. *Not result in cumulative exposure to non-ionising radiation exceeding International Commission guidelines[32] when the development is operational; and*
d. *Not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.*

2. *In assessing proposals for telecommunications infrastructure, local planning authorities should not require minimum distances to be maintained between telecommunications infrastructure and other development, seek to prevent competition between different operators, question the need for the expansion or upgrading of telecommunications networks, or use health safeguarding standards different from the International Commission guidelines on non-ionising radiation protection.*

CO2: Supporting information for telecommunications infrastructure proposals

1. *Development proposals for electronic telecommunications infrastructure (including applications for prior approval under the General Permitted Development Order, as amended) should be supported by the following, where relevant:*

a. *Information on the outcome of pre-submission consultation with organisations with an interest in the proposed development (in particular with the relevant body where a mast is to be installed near a school or college, or within a statutory safeguarding zone surrounding an aerodrome, technical site or military explosives storage area;*
b. *Where a new site is proposed, evidence that the applicant has sought to keep the number of these to a minimum in accordance with policy CO1(1)(a). This should include evidence that the possibility of erecting any antennas on an existing building, mast or other structure has been explored; and*
c. *Evidence demonstrating compliance with policy CO1(1)(c) and (d), including a statement that self-certifies that the cumulative exposure, when operational, will not exceed International Commission guidelines on non-ionising radiation protection.*

Design Principles

Chapter 14 of the NPPF, entitled 'Achieving well-designed places', establishes the national policy framework for design principles. The objective of the policies of this chapter is:

> *"to promote high quality, healthy, inclusive and sustainable places, through setting clear expectations about design outcomes and the use of relevant tools and processes."*

The relevant National decision-making policies under Chapter 14 include:

DP3: Key principles for well-designed places

1. *Development proposals should respond to their context (the history, character and features of their site and its setting), so that they integrate with and enhance their surroundings; such as through the arrangement of development plots and buildings, the use of materials and architectural features, and the restoration, reuse and integration of heritage assets. This should not preclude innovation or change where appropriate, especially where an increased scale or density of development is justified in accordance with policies L2 and L3.*

2. *To create well-designed places, development proposals should also reflect relevant aspects of the following principles, as appropriate to the nature of the development and its location[45]:*

    a. *Liveability: support healthy, mixed, vibrant and integrated communities, which will function well over the lifetime of the development, by incorporating a range of uses and tenures, employing features which promote social interaction, and which are robust, durable and easy to look after;*
    b. *Climate: contribute to climate change mitigation and adaptation and the transition to net zero by using building layouts, building orientation, massing, landscaping and materials which conserve energy and other resources, and which minimise risks from the impacts of climate change including overheating;*
    c. *Nature: incorporate and/or connect to a network of high quality, accessible, multi-functional green infrastructure to provide opportunities for recreation and healthy living, strengthen habitats, improve climate change resilience and improve air and water quality. This should include maintaining and enhancing tree cover and incorporating sustainable drainage systems in accordance with policies N3 and F8;*
    d. *Movement: provide transport infrastructure and choices which support the design vision for the site, provide good connections to the wider settlement (or those nearby),and prioritise walking, wheeling, cycling and public transport;*
    e. *Built Form: use the pattern of buildings to define the arrangement of streets, squares and other spaces, promote compact forms of development to optimise the site's potential, distinguish between public and private areas,*

create focal points and, where appropriate, enhance views into and out of the scheme;

f. *Public Space: include spaces that are safe, secure, inclusive, and accessible for all ages and abilities, including for groups such as women and girls; and which facilitate and encourage social interaction, play and healthy lifestyles (for example by providing high quality, clear and legible pedestrian and cycle routes, a variety of recreational spaces and places to meet, integrating lighting and making building entrances and windows face onto streets and other public spaces to provide natural surveillance); and*

g. *Identity: create visually attractive, distinctive and characterful development to establish or maintain a strong sense of place and pride, including through the use of a coherent palette of materials, design features and planting.*

3. *Development proposals should be refused if, without clear justification, they conflict with paragraph 1 of this policy or relevant aspects of the principles in paragraph 2, or with any explicit design standards set out in the development plan (including those in locally-specific policies, guides, codes or masterplans). Substantial weight should be given to compliance with relevant development plan policies when assessing the design quality of proposals.*

4. *The principles set out in the Design and Placemaking planning practice guidance should be used to inform how this policy is applied in the absence of locally-produced design policies, guides, codes or masterplans.*

5. *Substantial weight should also be given to outstanding or innovative designs which promote high levels of sustainability, or which help raise the standard of design more generally in an area, so long as they are consistent with the overall form and layout of their surroundings.*

Sustainable Transport

Chapter 15 of the NPPF, entitled 'Promoting sustainable transport', establishes the national policy framework for transport. The objective of the policies of this chapter is:

> *"to ensure that transport considerations are taken fully into account in the preparation of development plans and the evolution and assessment of development proposals; using a vision-led approach to embed the role that transport infrastructure and choices can play in creating well-designed, sustainable, inclusive and popular places."*

The relevant National decision-making policies under Chapter 15 include:

TR4: Street design, access and parking

1. *To contribute to creating well-designed places, transport considerations should be integral to the design of development, proposals for which should:*

a. *Give priority first to walking, wheeling and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating easy access to high quality public transport, with layouts and densities which maximise the catchments for bus or other public transport services;*
b. *Incorporate or contribute towards appropriate features to support this prioritisation, such as permeable street networks, continuous footways and segregated cycle facilities which are adequately lit, sufficient secure and accessible cycle parking, regularly spaced public seating and good quality waiting facilities for public transport;*
c. *Ensure that the arrangement of streets and other routes help to create places that are safe, inclusive and attractive for all users (particularly for women and girls, for other groups who may be vulnerable to crime or the fear of crime, and for those with limited mobility). This includes reflecting relevant aspects of policy DP3(2), as well as employing measures to:*
    i. *Minimise the scope for conflict between pedestrians, cyclists and vehicles;*
    ii. *Meet the needs of disabled people, older people and children in relation to all modes of transport, and*
    iii. *Avoid unnecessary street clutter.*
d. *Allow for the efficient delivery of goods, and ease of access by service and emergency vehicles, in ways which do not compromise key place-making principles (set out in policy DP3(2)); and*
e. *Provide a suitable number of parking spaces for a range of transport modes where appropriate, reflecting the location and nature of the development (including its connectivity), any locally-set standards in the development plan, and including adequate provision of spaces and infrastructure that allow for the charging of electric vehicles in safe, accessible and convenient locations. A flexible approach to applying parking standards should be taken where the reconfiguration of retail or other sites which attract large numbers of customers would make better use of previously developed land, and there is evidence that a certain number of spaces needs to be retained to meet specific operational and commercial requirements.*

Healthy Communities

Chapter 16 of the NPPF, entitled 'Promoting healthy communities', establishes the national policy framework for public services. The objective of the policies of this chapter is:

> *"to promote the creation of healthy and inclusive places and support the provision of appropriate public services, by enabling development which can support this aim and seeking to retain, improve and deliver new facilities which are important for community wellbeing and minimising inequalities."*

The relevant National decision-making policies under Chapter 16 include:

HC4: Proposals for new and improved community facilities, public service infrastructure and development providing public health benefits

1. *Substantial weight should be given to the benefits where:*
   a. *New or improved public service infrastructure or community facilities would be provided; and*
   b. *Development proposals would make a demonstrable contribution towards promoting good health, preventing ill-health, reducing health inequalities or supporting social interaction in the local community (such as, but not limited to, the provision of new recreation facilities, meeting places and opportunities to grow or purchase healthier food).*

2. *Local planning authorities, developers and public service providers should collaborate in a positive and proactive manner to identify and resolve key planning issues before applications for community facilities and public services infrastructure are submitted. Where appropriate local communities should be engaged in the design of proposals, including children and families where new or improved facilities for play are involved so that developments are inclusive and reflect user needs.*

HC6: Retention of key community facilities and public service infrastructure

1. *Development proposals should not result in the loss of key community facilities and public service infrastructure unless:*
   a. *It can be demonstrated that there is no reasonable prospect of the use being retained, either due to there being insufficient community support for the service it provides, or because it is no longer viable or feasible to operate (in the case of shops and public houses where commercial viability is an issue, evidence should be provided that reasonable steps have been taken to market the property for its existing use without success, for a period of at least 12 months); or*
   b. *The loss resulting from the proposed development would be replaced by equivalent or better provision, in a location which offers comparable or improved accessibility for the community it serves; or*
   c. *The decision-maker is satisfied that there is sufficient alternative provision of the type of use concerned in the local area, such that its loss will not diminish access to key community facilities and public service infrastructure.*

2. *For the purpose of this policy, key community facilities and public service infrastructure means established services that are used (or which have been used) on a frequent basis in a local area such as local shops, public houses, places of worship, local health facilities, community halls and cultural venues. It excludes recreational land and facilities which are addressed in policy HC7.*

Historic Environment

Chapter 20 of the NPPF, entitled ‘Conserving and enhancing the historic environment’, establishes the national policy framework for the historic environment. The objective of the policies of this chapter is:

> *"to conserve and enhance the historic environment. Heritage assets are an irreplaceable resource, and range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations*[63]

Where a proposal affects a designated heritage asset or its setting, the following relevant National decision-making policies under Chapter 20 should be applied:

- *HE5: Assessing effects on heritage assets*
- *HE6: Proposals affecting designated heritage assets*
- *HE7: Decisions on non-designated heritage assets*
- *HE9: Conservation areas*

Where a proposal would result in harm to a designated heritage asset, the effect on the asset and its significance should be weighed against the public benefits of the proposal in accordance with the relevant NPPF heritage policies.

The NPPF does not provide an unrestricted presumption in favour of telecommunications infrastructure irrespective of its environmental effects. Policy CO1 requires proposals to minimise visual impact, while the wider Framework contains policies for the protection of landscape, biodiversity, designated heritage assets and other environmental considerations. Accordingly, the benefits associated with improved telecommunications infrastructure must be considered alongside the specific characteristics and sensitivities of the site.

The importance of the proposed development in providing the upgrading and enhancement of the existing public phone kiosk network is clearly an important material planning consideration as it directly supports sustainability and is also precisely the type of new digital infrastructure that the NPPF is seeking to support. The development proposed is comparatively small scale, sited where the principle of telecommunications development has been long established and therefore accepted, designed in a way that is predominately consistent with the existing infrastructure setup and so should be acceptable in every respect.

Planning Practice Guidance

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

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

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

On matters of Public Safety, the PPG states that:

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

Code of Best Practice on Mobile Network Development in England (March 2022)

The Code of Best Practice has been fully revised in March 2022 and is now even more supportive of mobile network provision in line with Government aspirations that everyone should have access to the information superhighway no matter where they are located whether that be in rural or urban areas. This Code provides guidance to mobile network operators, their agents and contractors and equally to all local planning authorities in England. It supersedes the Code of Best Practice on Mobile Phone Network Development (2016).

The principal aim of this Code is to support the government's objective of delivering high quality wireless infrastructure whilst balancing these needs with environmental considerations. It also has an important role in making sure that appropriate engagement takes place with local communities and other interested parties.

The development of such infrastructure must be achieved in a timely and efficient manner, and in a way, which balances connectivity imperatives and the economic, community and social benefits that this brings with the environmental considerations that can be associated with such development. The Code also has an important role in making sure that appropriate engagement takes place with local communities and other interested parties. The Code also highlights that wireless technology continues to evolve rapidly, and mobile devices are now capable of much more. Second generation (2G) technology gave us voice calls and text messages, 3G led to the launch of smartphones, and 4G, which enabled faster browsing, allowed us to do things like watching videos on the move. 5G, the latest generation of wireless technology, is much faster than previous generations of wireless technology and can offer greater capacity

and lower latency, allowing thousands of devices in a small area to be connected at the same time. 5G networks, and future mobile generations, will be vital for a range of Internet of Things uses (IoT) and Smart City applications.

The Code highlights that local planning authorities should support the deployment of digital infrastructure by:

- Incentivising connectivity: support the expansion of telecommunications networks, and take a 'joined-up' approach to the wireless infrastructure planning process, including ensuring that Local Plans effectively support the deployment of digital infrastructure.
- Facilitating sites: engage with operators when new sites have been proposed and discuss site requirements.
- Engagement with operators: respond positively to requests for engagement and make decisions in line with national policy and Local Plans. For planning applications, find solutions to issues and ensure timely decisions are made.
- Information and communication: ensure that members of the public can access information about any development proposals within their local area. Send communications promptly to an appropriate operator contact (or their representatives).

It also goes onto state 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'. This is followed by highlighting that 'There should be a presumption in favour of facilitating sustainable network development and, as such, operators and local planning authorities, as well as all other bodies involved in the deployment process, should work together to ensure connectivity needs are met and find viable solutions to deployment issues".*

The Code highlights the Government's Communications Policy and Planning Policy. It acknowledges that digital connectivity is vital to enable people to stay connected and businesses to grow. Fast, reliable digital connectivity can deliver economic, social and well-being benefits for the whole of the UK. The Code indicates that recent changes in planning policy [and regulation] are intended to align with Government communications policy, where the ultimate goal is to achieve mobile coverage wherever it is needed. Furthermore, the Code also reiterates NPPF guidance in strongly supporting high quality communications infrastructure, which is seen as essential for sustainable economic growth.

4.2 Development Plan Policy

Section 70 of the Town and Country Planning Act 1990, as amended, requires planning applications and appeals to be determined having regard to the provisions of the Development Plan and other material considerations, and section 38 of the Planning and Compulsory Purchase Act 2004 requires applications and appeals to be determined in accordance with the Development Plan unless material considerations indicate

otherwise. Material considerations include relevant policies in the National Planning Policy framework (NPPF) - among them the 'presumption in favour of sustainable development'.

For the purposes of Section 70, the current adopted Development Plan for Kirklees Council is currently comprised of the following:

- Kirklees Local Plan (2019)

Kirklees Local Plan (2019)

The Kirklees Local Plan was adopted on 27 February 2019. It covers the period 2013–2031 and the plan replaces the previous Kirklees Unitary Development Plan (UDP) 2007. The Local Plan is divided into two main parts:

- Part 1: Strategy and Policies – Contains the spatial strategy, development management policies, and guidance for sustainable development
- Part 2: Allocations and Designations – Identifies specific sites for housing, employment, mixed-use development, and areas to be safeguarded from development, supported by a Policies Map

The following policies are of relevance to the proposal:

Policy LP24 – Design

Good design should be at the core of all proposals in the district and should be considered at the outset of the development process, ensuring that design forms part of pre-application consultation of a proposal. Development briefs, design codes and masterplans should be used to secure high quality, green, accessible, inclusive and safe design, where applicable. Where appropriate and in agreement with the developer schemes will be submitted for design review.

Proposals should promote good design by ensuring:

a. *the form, scale, layout and details of all development respects and enhances the character of the townscape, heritage assets and landscape;*

b. *they provide a high standard of amenity for future and neighbouring occupiers; including maintaining appropriate distances between buildings and the creation of development-free buffer zones between housing and employment uses incorporating means of screening where necessary;*

c. *extensions are subservient to the original building, are in keeping with the existing buildings in terms of scale, materials and details and minimise impact on residential amenity of future and neighbouring occupiers;*

d. *high levels of sustainability, to a degree proportionate to the proposal, through:*

   i. *The re-use and adaptation of existing buildings, where practicable;*
   ii. *design that promotes behavioural change, promoting walkable neighbourhoods and making walking and cycling more attractive;*

iii. *considering the use of innovative construction materials and techniques, including reclaimed and recycled materials;*
iv. *where practicable, minimising resource use in the building by orientating buildings to utilise passive solar design. This includes encouraging the incorporation of vegetation and tree planting to assist heating and cooling and considering the use of renewable energy;*
v. *providing charging points to encourage the use of electric and low emission vehicles;*
vi. *incorporating adequate facilities to allow occupiers to separate and store waste for recycling and recovery that are well designed and visually unobtrusive and allows for the convenient collection of waste;*
vii. *designing buildings that are resilient and resistant to flood risk, where such buildings are acceptable in accordance with flood risk policies and through incorporation of multi-functional green infrastructure where appropriate;*
viii. *designing places that are adaptable and able to respond to change, with consideration given to accommodating services and infrastructure, access to high quality public transport facilities and offer flexibility to meet changing requirements of the resident / user.*

e. *the risk of crime is minimised by enhanced security, and the promotion of well-defined routes, overlooked streets and places, high levels of activity, and well-designed security features;*

f. *the needs of a range of different users are met, including disabled people, older people and families with small children to create accessible and inclusive places;*

g. *any new open space is accessible, safe, overlooked and strategically located within the site and well integrated into wider green infrastructure networks;*

h. *development contributes towards enhancement of the natural environment, supports biodiversity and connects to and enhances ecological networks and green infrastructure;*

i. *the retention of valuable or important trees and where appropriate the planting of new trees and other landscaping to maximise visual amenity and environmental benefits; and*

j. *the provision of public art where appropriate.*

Policy LP25 – Advertisements and shop fronts

Shop fronts, signs and advertisements make a significant contribution to the character and local identity of the district's town centres.

1. *The development of new or replacement shop front units and display of advertisements will only be permitted if they satisfy the following criteria:*

a. *the design is consistent with the character of the existing building in terms of scale, quality and use of materials;*
b. *proposals respect the character of the locality and any features of historic, architectural, cultural or other special interest;*
c. *the shop fascia is designed to be in scale, in its depth and width, with the façade and street scene of which it forms part.*

2. *Proposals for the alteration of existing shop fronts or installation of new shop fronts and display of advertisements on a Listed Building or within a Conservation Area should preserve or enhance the character and appearance of the building, the area in which it is located and any features of architectural or historical interest. Existing traditional shop fronts shall be retained and restored unless exceptional circumstances apply. Proposals for new shop fronts and advertisements must be of a high standard of design and be appropriate in style, scale and materials to the building and its setting.*

Policy LP48 – Community facilities and services
Community facilities should be provided in accessible locations where they can minimise the need to travel or they can be made accessible by walking, cycling and public transport. This will normally be in town, district or local centres.

Proposals will be supported for development that protects, retains or enhances provision, quality or accessibility of existing community, education, leisure and cultural facilities that meets the needs of all members of the community.

Where community facilities are provided as an integral part of a development, they should wherever possible be within adapted mixed-use buildings.

Proposals which involve the loss of valued community facilities such as shops, public houses and other facilities of value to the local community will only be permitted where it can be demonstrated that:
a. *there is no longer a need for the facility and all options including the scope for alternative community uses have been considered; or*
b. *its current use is no longer viable; or*
c. *there is adequate alternative provision in the locality to serve the local community which is in an equally accessible location; or*
d. *an alternative facility of equivalent or better standard will be provided, either on-site or equally accessible; and*
e. *any assets listed on a Community Asset Register have satisfied the requirements under the relevant legislation.*

4.3 Relevant Reference Documents

Guidance for Digital Roadside Advertising and Proposed Best Practice – 2013

The Transport for London's ('TfL') Guidance for Digital Roadside Advertising and Proposed Best Practice – 2013 ('the TfL Guidelines') is a guiding document for the

design and siting of advertising displays. The TfL Guidelines acknowledge assessment is based on a site-by-site basis, however, Section 4 provides recommendation for best practice assessment which broadly considers the below:

- *Location*
- *Longitudinal Spacing Between Digital Advertisements • Position*
- *Orientation*
- *Minimum Message Display Duration*
- *Display Screen Form and Message Sequencing*
- *The Rate of Change*
- *Information Displayed on the Screen*
- *Lighting*

Professional Lighting Guide 05/23 – The Brightness of Illuminated Advertisements Including Digital Displays

The Institution of Lighting Professionals ('ILP') Professional Lighting Guide 05/23 – The Brightness of Illuminated Advertisements Including Digital Displays (PLG 05/23) details acceptable levels of illumination and frequency of displays in line with road lighting requirements. The recommendations within PLG 05/23 are detailed in Section 10 'Requirements for illuminated advertisements including digital displays'. The relevant Environmental Zones for the proposal are E3 (suburban) and E4 (urban).

Table 10.4: Recommended maximum night-time permitted values of display luminance

Light Technical Parameter	Maximum sign luminance (L_s) cd/m²				
	Environmental zones				
Sign surface area	E0	E1	E2	E3	E4
0 to < 5 m²	0	25	200	300	300
5 to < 20 m²	0	0	200	300	300
≥ 20 m²	0	0	100	200	300

Figure 5 *– Recommended maximum night-time luminance within the* PLG 05/23

Table 10.5 – Recommended maximum daytime permitted values of sign luminance.

Daylight ambient Illuminance (Eh) [lux]	Sign Luminance [cd/m²]
Up to 3,500	≤ 400
3,501 to 8,500 (overcast day)	≤ 1,000
8,501 to 15,000 (bright day with cloud cover)	≤ 2,500
15,001 to 25,000 (bright sunny day)	≤ 3,500
25,001 to 42,000 (direct sunlight)	≤ 5,000
42,001 and above	> 5,000

Figure 6 *– Recommended maximum daytime luminance within the* PLG 05/23

5. Planning Assessment

Street Hub units provide a solution for modern cities that require reliable, high-speed broadband and mobile connectivity. Improved digital connectivity strengthens economic and social vitality by enabling residents and visitors to easily connect for everyday activities, services and recreation.

The site context, surrounding area and relevant planning considerations have been assessed, with particular consideration given to the following:

- Planning Policy;
- Visual Amenity;
- Highways Impact;
- Anti-Social Behaviour;
- Noise Impact;
- Continuous Maintenance;
- Heritage Assessment.

A full assessment of the above is provided in the detailed assessment below.

5.1 Response to Planning Policy

Within the National and Local Planning Policy, key themes emerge in relation to the strategic directions and policy objectives. The proposal appropriately responds to these themes by:

- Providing UK encouraged digital communication infrastructure in a strategic location that will be a high-quality design and provide enhanced digital connectivity;
- Improving public safety through providing access to emergency services, increased in-direct street illumination and reducing anti-social behaviour currently present in existing payphone booths;
- Providing advertising displays that are appropriately illuminated and designed to ensure no hindrance to surrounding transport networks, within 5% free screen time for the local Council;
- Promoting accessibility and inclusivity with fully accessible community features;
- Enhancing and improving the quality of the public environment and ensuring valued characteristics are protected, to create safe, functional places with strong sense of connection; and
- Promoting sustainability with units' electricity consumption matched with 100% renewable UK energy sources

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

5.2 Visual Amenity Considerations

It's accepted that balancing visual impact with the functional requirements of street-based development can be challenging. This assessment considers both the immediate streetscene and the wider visual context in which the proposal would be viewed.

Streetscenes inevitably evolve over time in response to technological change, user demand and urban growth. This is particularly relevant for telecommunications and advertisement structures, which form an integral part of modern, connected, sustainable cities.

The introduction of a Street Hub unit at the proposed location is considered appropriate and in keeping with the surrounding context and established advertising theme and will not impact the character of the area, result in the addition of clutter and will not result in the proliferation of street furniture or advertisements at this location. A detailed assessment of the visual impact is below.

5.2.1 Response to Site Context and Character

In selecting this location, it is considered that the proposal would be commensurate with the existing character and surrounding land use of the locality, which is highly commercial and includes modern architectural features, particularly associated with ground-level uses.

Along with a strong commercial context there is also existing advertisements, namely those associated with the adjacent commercial properties. Furthermore, there are double sided street hoarding signs and pylon signs within the surrounding street scene. These existing displays set a positive precedent for this type of development within the streetscape, an example of a nearby existing display is shown below:



Figure 7 – *Double-sided pylon sign outside, OUR West, Brooke St, Cleckheaton BD19 3RS*

The mock-up images below demonstrate how the proposed unit will successfully integrate within the surrounding area, specifically the adjacent commercial tenancies and associated advertisements without detriment to the visual amenity of the area. These images were taken during the survey of the site and shows the commercial setting and existing advertisement context of which creates an appropriate setting for the deployment of a Street Hub unit at this location.



Figure 8 *– Proposed Street Hub Unit is situ when viewed from the north*



Figure 9 *– Proposed Street Hub Unit is situ when viewed from the south*

The proposed Street Hub has a much more slender and slimline profile than that of existing BT phone boxes and would therefore be comparable in form and appearance to existing freestanding units of a similar form than that can be commonly found in many streets throughout the country, including that of sensitive and non-sensitive land designations. We note the presence of existing illuminated displays along this portion of the street scene, demonstrating this type of development is acceptable within the LPA. The Street Hub, as set out previously, is an evolved unit that will enhance and, in some instances replace, their existing estate throughout the country.

With regards to the proposed advertisement displays, it's considered that the displays and associated illumination would remain consistent with the established character of the surrounding streetscape. As acknowledged, the site is located within an established commercial setting along a public footway serving nearby retail uses and providing connections to the surrounding streets. As such, the area is well-lit throughout the day, with illumination provided by street lighting, shopfronts, window displays and other existing light sources. While it is accepted that the illuminated advertisements may be more noticeable during hours of darkness or in dull weather conditions, its illumination would remain consistent the existing illumination established within the surrounding area. In this context, the Street Hub would not appear visually incongruous or result in undue harm to the visual amenity or character of the area.

While any addition to the public realm introduces some visual change, this does not equate to significant or detrimental visual harm. The proposed BT Street Hub is therefore considered consistent with the existing commercial context and will integrate well within the ground-level context, reflecting the city's transition toward digital infrastructure.

5.2.2 Streetscene Integration

Street Hubs are designed to contribute to wider sustainability and net zero ambitions by consolidating multiple public services – telephony, Wi-Fi, information and advertising – into a single, streamlined piece of infrastructure, removing the requirement for multiple standalone items of street furniture.

The Street Hub is considered strategically positioned to ensure no impact or contribution to clutter. The unit has been positioned 500mm from the kerbline, aligned with the position of existing street infrastructure at this location. Specifically, the unit aligns with the position of the existing planter boxes. Aligning with existing street furniture and infrastructure ensures sight lines are maintained along this portion of the footpath. Its siting and scale have been carefully considered to integrate with the existing streetscape, minimising visual impact and avoiding the creation of unnecessary visual clutter.

The unit is safely positioned to avoid conflict with existing infrastructure, street furniture and services to ensure no conflict, preventing any addition to street clutter.

It's acknowledged that the Street Hub unit would be circa 3m in height and slightly taller than existing BT phone booths found across the country, however it's considered that

the scale and design would not result in additional visual clutter or materially alter the established character of the streetscape. Its scale and form remain proportionate to the surrounding environment and will therefore successfully integrate within the existing street scene without creating undue visual prominence or a detrimental impact on visual amenity. The image below demonstrates the small footprint and slender profile of the Street Hub and how this ensures it effectively integrates within the street scene:



Figure 10 *– Existing conditions of footpath*



Figure 11 *– Proposed conditions of Street Hub in situ*

5.2.3 Street Furniture and Advertisement Consolidation

The position of the street hub has been informed by the presence of existing street furniture and advertisements to create a consolidated and coordination street scene. Specifically, the site is positioned in line with existing street furniture and integrates effectively within the existing streetscape ultimately ensuring view lines and amenity is maintained along this portion of the street.

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

When seen in the overarching context of the street scene, it is considered that the location, size and height of the digital advertisement panels would, on balance, be acceptable in what is a commercial context. As mentioned, 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.

Whilst the presence of existing advertisements along nearby street scenes is noted, the proposal is not considered to increase clutter or proliferation as it maintains an adequate distance from existing displays and this form of development has already accepted within the Council area in the form of bus shelter displays or other freestanding illuminated units. It's reiterated that the proposal will be an upgrade of existing infrastructure, seeing the removal of outdated BT payphone, where possible, as well as offering extensive public benefits of which the existing advertising displays and freestanding unit's do not provide.

Its therefore considered that the proposed advertisements are an acceptable form of development that will not contribute to proliferation of advertisements at this location.

Refer to **Appendix A** submitted alongside this application for recent allowed appeal decisions on similar applications, whereby visual amenity was the primary consideration.

5.3 Highways Assessment

The Street Hub is located on a section of adopted public footpath setback approximately 2.2m from the nearest shopfront and 500mm from the kerb line. The position of the street hub has been carefully sited to ensure no impact to the flow of pedestrians or cause impact to adjoining highways safety.

5.3.1 Pedestrian Safety

With regard to pedestrian flow, in determining the appropriate siting of the unit and suitable width of remaining footpath widths, consideration was given to the Department

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

Considering the guidance above, the unit is considered compliant with the recommendations, with a primary width of 2.2m of usable footway retained. In essence, this would retain a substantial width of useable and unobstructed footpath at this point, which is more than sufficient and above the recommended guidance. We therefore consider that pedestrian flow at this portion of the footpath will remain unobstructed.

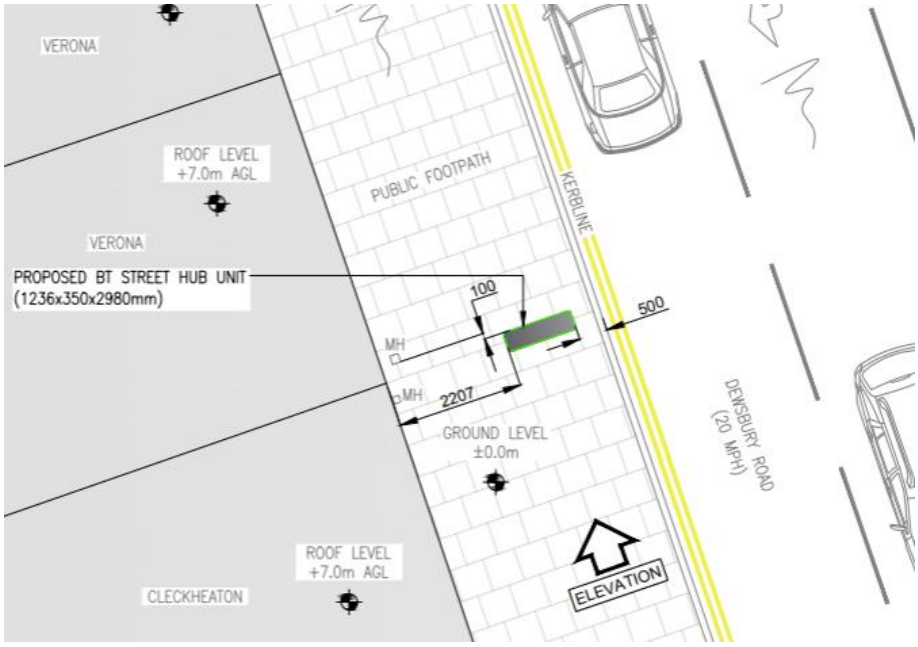


***Figure 12** – Proposed site plan showing the width of retained footpath*

5.3.2 Vehicle Safety

In relation to concerns regarding potential distraction to road users, the design and siting of the proposed unit is considered entirely appropriate and will not impact vehicles or cyclists on the adjoining carriageway. The design and illumination of the advertisements considered Section 12 of the NPPF as well as guiding documents including the Transport for London's ('TfL') *Guidance for Digital Roadside Advertising and Proposed Best Practice – 2013* ('the TfL Guidelines') and the Institution of *Lighting Professionals ('ILP') Professional Lighting Guide 05/23 – The Brightness of Illuminated Advertisements Including Digital Displays*. We note the ILP's Lighting Guide was

submitted alongside the original applications. We confirm that the proposed advertisements are consistent with the recommendations of the above guidelines, specifically, the siting achieves the following:

- There would be no conflict with any traffic signs, signals, crossing points, schools, hospitals or low bridges.
- No sightlines or clearances would be affected.
- The TfL guidance states that 'Static digital advertising is likely to be acceptable in locations where static advertising exists or would be accepted.' There is existing traditional advertisement on similar sections of the respective roads in many cases.
- The geometry of the roads is not complicated, and the driving conditions are not considered to be demanding or complicated.
- The advertisements would not be experienced by a driver in conjunction with any other similar digital advertisements.
- As per the TfL guidance, the advertisements would be located as close to the driver's natural eye line as possible and facing as head-on to the traffic as is practical.

We confirm the proposed advertising displays have been designed to ensure full compliance with recommended illumination levels and frequency of displays as outlined in the ILP's Lighting Guidance and the TfL Guidelines. The advertising displays are considered well sited, away from traffic signals and other advertisements and will not cause distraction to road users. It's reiterated that the illumination and displays will not resemble official road traffic signs or traffic lights. Specifically, the displays achieve the following, as recommended in the relevant guidelines:

- Day time illumination levels at 2500 cd/m²
- Nighttime illumination levels at 300cd/m2
- 10 second interval advertising displays.

It is recognised that all advertisements are intended to attract people's attention, however in this case their siting and size would not create an untoward feature within the existing commercial street scene and general locale. The position where the BT Street Hub is to be located in relation to the road would not cause any interference with nearby road signs and or navigational lights. Viewed within the street scene setting, the digital advertisements would be partially seen by passing motorists but 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. Furthermore, given its location it would not give rise to any potential impact on visibility splays or sightlines. When viewed within the street scene context of the wider environment, it is not considered that the Street Hub would appear as an untoward feature to passing motorists.

5.4 Security, Crime and Anti-Social Behaviour

We consider that the primary function and design of the proposed unit do not have any evidence of encouraging anti-social behaviour. Specifically, the units are designed for

short-stay functional uses, such as emergency contact or phone charging. They do not, by way of design or function, encourage people to loiter for long-periods or engage in crime related activities. We further note the proposed unit, unlike traditional phone kiosks, do not include enclosed spaces or shelter and will be an illuminated structure in a publicly visible location and is therefore considered an appropriate form of development that will not attract opportunities misuse.

We make reference to appeal 6002191 and 3376537 determined by the Planning Inspectorate on 27 April 2026, which was allowed for the installation of a Street Hub unit in Camden Council. The LPA had refused this application on grounds of the potential for anti-social behaviour. However, this was overturned at appeal with the Inspectorate determining the following:

> *19. I address matters related specifically to the maintenance and cleaning of the proposed unit below. However, while I do not seek to downplay the harmful impacts of street crime and anti-social behaviour, there is no substantive evidence before me to demonstrate that those issues would be increased as a result of the proposed development. Indeed, as the proposed Street Hub 3 unit would replace an existing unit, and would provide a comparable range of services, I consider that it would be likely to be broadly neutral in this respect.*
>
> *20. As such, there would be no significant adverse effect on crime and public safety. I therefore find no conflict with Policy C5 of the CLP, which seeks to tackle crime and anti-social behaviour, and to promote safer streets and public areas.*

Case Study: BT Collaboration with Local Police

A case study was previously undertaken in partnership with BT, Camden Council and the Metropolitan police area, whereby the advertisement screens associated with BT existing ‘InLink’ units were utilised to display messaging directly related to crime awareness. Specifically, item snatching messaging was displayed, which was identified as an issue within the wider Kings Cross policing ward.

Over the course of the campaign, rates of item snatching within the area had reduced. This therefore demonstrates the proposed units and associated advertising screens provide opportunity to reduce crime and antisocial behaviour in the vicinities of where these units are deployed.

The below image if taken from the BT supporting document ‘Street Hubs – Beyond Connection’ and shows a brief overview of this campaign case study.

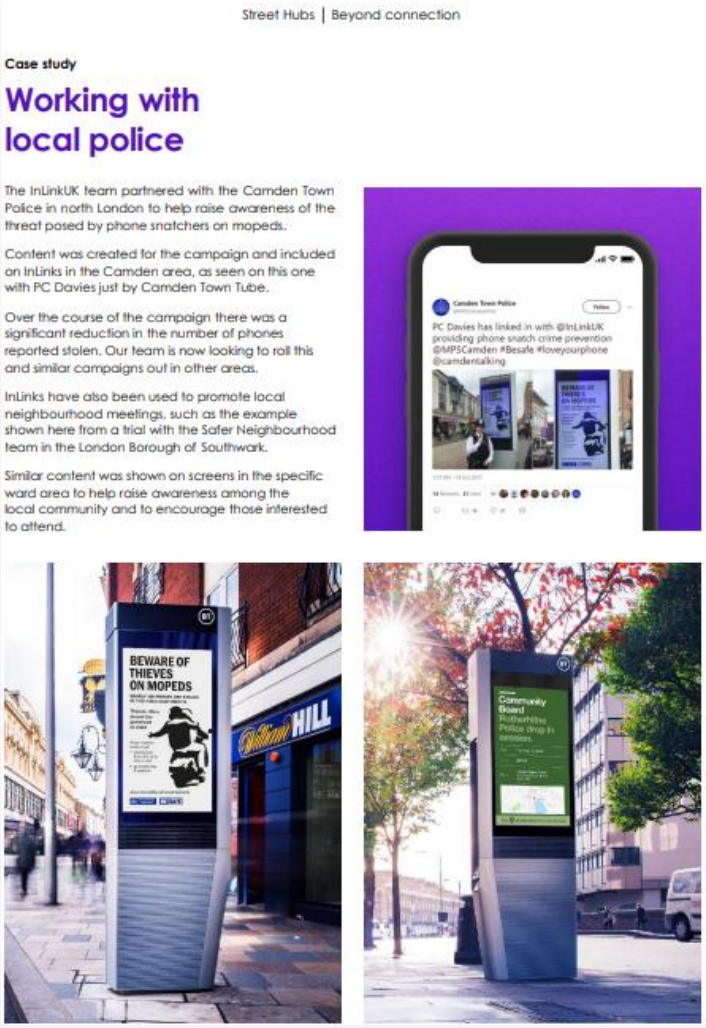


Figure 13 *– BT ASB Case Study*

Please refer to the accompanying BT Street Hubs Anti-Social Behaviour Management Plan and page 25 of the accompanying BT Street Hub Product Statement V.2 prepared by *BT Group Plc* for full details of the anti-social behaviour management.

5.5 Noise Management

The Street Hub units are appropriately designed to ensure noise emissions are managed appropriately to ensure safety, amenity and privacy for users and passing pedestrians.

Free phone calls via a speaker and microphone system are a key feature of the Street Hub unit. The ‘BT Noise Management Plan’ prepared by BT Group Plc that supports this application provides full details of the noise management steps taken to ensure that these calls, help improve the amenity of the area whilst respecting the expectations of local community. It’s acknowledged that the management plan relates specifically to noise from the Street Hub and not any external factors such as users of the unit or other nearby sources.

It is worth noting that the Street Hub are situated on public streets, in the most part close to roads where high volumes of traffic will be seen, examples of background noise experienced on streets are detailed below:

Noise Level, dB	Example
60-70	Conversational Speech
70-80	Average traffic on Street Corner
80-90	Heavy lorries at 6m

The Street Hub units have a maximum volume of 85db and the average volume settings are 65dB average at 3m distance from each Street Hub. Users may also choose to use headphones when making calls or using the tablet, which deactivates the speaker for the duration of their use.

The Street Hub Volume controls which form part of the noise management plan include the following:

- **Daytime (07:00 – 21:00)**
  Street Hub have controllable volume levels. This will default to 50% at the start of any user activity during the day and can be increased and decreased based on the preferences of the user.
- **Nighttime (21:00 – 07:00)**
  Between the hours of 21:00 to 07:00 all Street Hub will be governed so that the volume cannot be increased to greater than 60% of the maximum volume.
- **999 Calls**
  It should be noted that when the 999 is called through the tablet or the emergency button is pressed by a user the volume of calls is set to 100% to ensure that any user is able to effectively communicate with the emergency services. This volume can be lowered as requested by the user.

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

1. Understand the reason for the issue and any extenuating circumstances. At this point BT will separate out any Police or community safety matters and work directly with the relevant authorities and support the local residents in raising these issues through official channels where appropriate.
2. Verify the evidence provided against the Street Hub's call history and other operational data as required. This will allow an understanding of the the number, time, and frequency of outbound calls being made and better understand the severity of the reported situation.
3. Once the situation has been verified, BT will typically look to apply local bespoke volume governor controls appropriate to the situation. We have found that reducing the Street Hub 's maximum volume to 40% during relevant periods tends to resolve issues where they have been identified.

In addition to the above, BT will continue to monitor the situation and listen to ongoing feedback from the community as we do take matters seriously. BT continue to learn as

part of their roll out as to how Street Hub are fitting in to the community. To date, there has been no issues in respect of matters relating to potential noise nuisance.

Please refer to the 'BT Noise Management Plan' prepared by *BT Group Plc* for full details of the noise management plan.

5.6 Deployment and Maintenance

The Street Hub unit is positioned to ensure the safe, effective and accessible deployment and continuous maintenance of the unit, being appropriately setback from existing infrastructure and services.

Where a Street Hub replaces an existing BT phone kiosk the existing phone booth will be disconnected and removed. Safety barriers and signage are installed in line with relevant authority permits during installation works.

The management of the Street Hub will include weekly physical inspections, which include the following:

- Check for damage, graffiti and screen performance;
- Function testing including calls, 999 access, maps and USB charging; and
- Photo records taken during each inspection.

Street Hubs are monitored remotely 24/7, enabling faults to be identified quickly and addressed in line with agreed service levels. Most issues are resolved within three working days, with safety-related or power faults prioritised for faster response.

Cleaning is carried out every two weeks, with separate in-field quality inspections undertaken on an alternating schedule. This approach ensures a regular on-site presence, while maintaining high standards of cleanliness and performance.

The applicant is responsible for the installation and management of the Street Hub in line with 'Section 6. Installation, Operations & Management' of the relevant BT Street Hub Product Statement V.2 prepared by *BT group plc.*

6. Conclusion

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

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

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

6.1 Proposed Schedule of Operating Condition

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

a. *Within three (3) months of development commencing, the existing BT payphone indicated for removal, shall be removed in their entirety and the land made good to the same condition as the adjacent land.*

b. *The intensity of the illumination of the two digital display screens shall not exceed 600 candelas per square metre (cd/m2) between dusk and dawn in line with the maximum permitted recommended luminance as set out by 'The Institute of Lighting Professional's 'Professional Lighting Guide 05: The Brightness of Illuminated Advertisements'.*

c. *The digital display screens shall not display any moving, or apparently moving, images (including animation, flashing, scrolling three dimensional, intermittent or video elements).*

d. *The minimum display time for each piece of content on the digital display screens shall be 10 seconds.*

e. *The interval between each piece of content on the digital display screens shall take place over a period no greater than one second; the complete screen shall change with no visual effects (including swiping or other animated transition methods) between displays and the display will include a mechanism to freeze the image in the event of a malfunction.*

f. *No content on the digital display screens shall resemble traffic signs, as defined in section 64 of the Road Traffic Regulation Act 1984.*