Planning Supporting Statement

Our Ref.	BLP-209
Street Hub Address	Footpath outside 31C Whitegate Drive (Dinners Ready), Blackpool
Postcode	FY3 9AA
National Grid Reference	E: 331793, N: 436150
Project Type	Relocation
Conservation Area	Raikes
Statutory Listed Buildings	N/A

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1.0 Introduction

1.1 Overview

This Planning Supporting Statement has been prepared by Harlequin Group on behalf of BT Group plc. The statement has been prepared in support of the planning application made to the Council for the installation of a 'Street Hub' at the footpath outside 31C Whitegate Drive (Dinners Ready), Blackpool, FY3 9AA (NGR: E-331793, N-436150). This application is made under the Development Management Procedure Order (2015). The statement sets out the most relevant considerations in respect of the proposed development.

In accordance with the Code of Best Practice on Mobile Network Development and published Government guidance, this proposal was drawn up having regard to the need for good design. This statement sets out the most relevant considerations in respect of the proposed development. This provides context for the proposal, reasoning, technical justification and planning constraints, policy guidance and alternatives.

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.

1.2 Purpose of Street Hubs

2021 marks the 100th anniversary of the original K1 kiosk. Public connectivity moved on with the deployment of InLink units, and now, BT are further updating and evolving the payphone estate to better serve todays digitally connected converged-media society.

Over the last few years, BT have been 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. Through collaboration with councils, BT have helped in creating a service that has 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 over the last 18 months on a new and improved unit - the 'Street Hub'. The Street Hub has all the existing benefits of the previous InLink structure – ultrafast Wi-Fi, free public calls, public information - but with better Wi-Fi range, environmental monitoring, secure power-only USB ports for rapid device charging, and an expanded phone network coverage with 5G mobile enablement. Street Hubs have the capacity to boost 4G and 5G through the installation of small cells within the unit casing, improving coverage and capacity. Consequently, when installed, residents, local businesses and visitors will get a faster, more reliable connection for calls and internet access.

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.

Furthermore, Street Hubs are powered by 100% renewable carbon-free energy, making them sustainable and durable for years to come.

BT head of street James Browne said: Street Hubs form part of BT's plan to transform the UK's streets with a digital communications service designed for the 21st Century.

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

1.3 The Importance of Mobile Connectivity

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

1.4 UK Government Policy on Mobile Infrastructure Deployment

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

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

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

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

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. Our accompanying document of national policy '**National Policy - Delivering Ultra Fast Broadband Mobile Connectivity',** sets out how 5G mobile connectivity will underpin the UK Digital Economy and the significant social, economic and sustainability benefits of advanced modern connectivity. It is essential that the planning system looks to support and facilitate new 5G base station installations such as that proposed 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.

1.6 Air Quality Monitoring/Sustainability

Each year, thousands of people die prematurely as a result of air pollution across the country, and millions more face health threats every day. Many Council areas have breached legal limits for air quality every year since implementing them in 2010, with many Council areas, including all of London's boroughs, failing both annual targets and World Health Organisation standards.

Some people are especially vulnerable to the dangers of air pollution and contraction of viruses – including children, the elderly, low-income communities and those with diabetes, heart disease or respiratory problems. These groups may suffer an increased risk of developing cardiovascular disease, cancer, asthma, and other respiratory diseases; or of worsening conditions that are already present. What we typically think of as air pollution is a mixture of small particles such as black carbon, gases like nitrogen oxides, ozone, and sulphur dioxide.

In January 2019, the Mayor of London launched the world's most advanced and comprehensive network of air quality monitors to help investigate and improve London's toxic air. This programme known as 'Breathe London'[1] will use a range of cutting-edge fixed and mobile sensors to build up a real-time, hyperlocal image of London's air quality. The data these monitors collect from across the capital will provide an unprecedented level of detail about London's air quality crisis and deliver new insight into the sources of pollution.

While the above referenced network of air quality monitors is focused on the capital, poor air quality is not exclusive to London, with many, if not all, Council areas throughout the country experiencing higher than acceptable levels of poor air quality. As highlighted, understanding the issue and identifying areas where there are high levels of poor air quality is key in then implementing adequate measures aimed at reducing such levels of poor air quality.

Sustainable design is at the core of the new unit offering. Working with tech scale-up Everimpact via BT's Green Tech Innovation Platform, air quality and CO2 sensors are built into the new units. This will provide actionable environmental insights to help local councils achieve their sustainability goals such as becoming carbon neutral by 2030, a target that nearly two thirds of local authorities have made. Supporting the clean air initiatives of local authorities will lead to improved air quality, in turn benefiting the health of local communities.

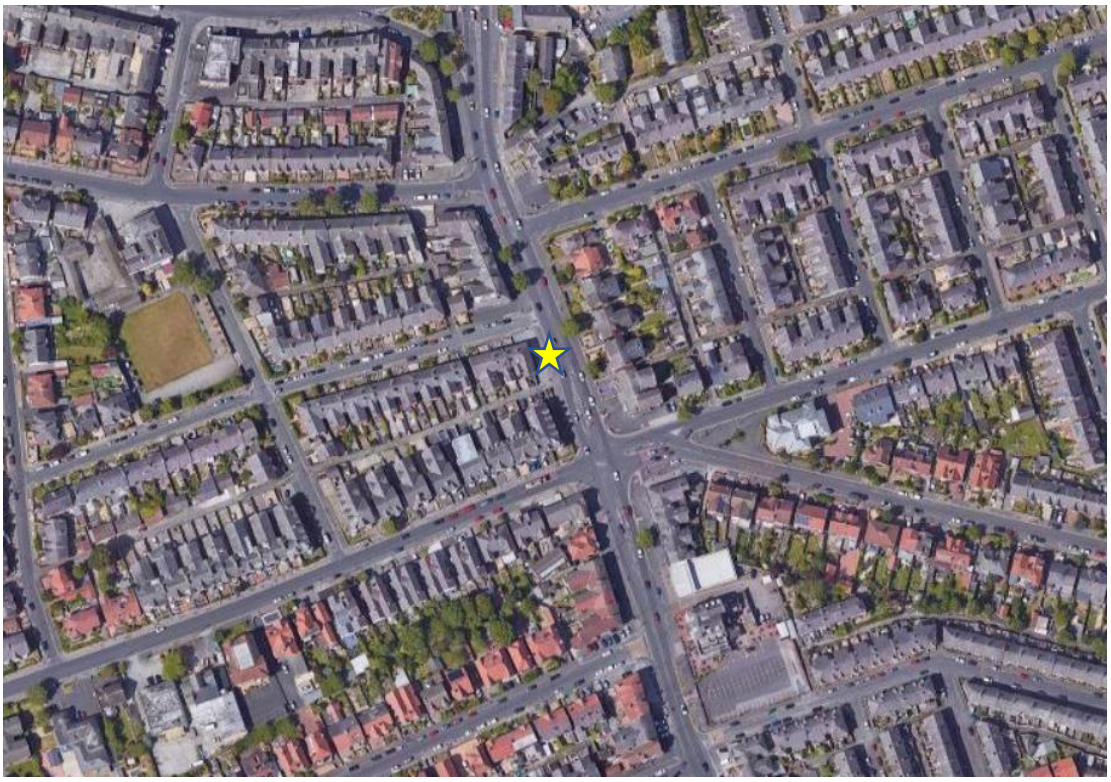
[1] https://www.breathelondon.org/about/

2.0 Proposed Development

2.1 Site and Proposed Development

The application site comprises a wide pedestrian footpath that runs along Whitegate Drive Blackpool, situated outside Dinners Ready Cafe, with the surrounding area resembling a mixed use residential and commercial streetscape. There is an existing BT phone box in situ on the footpath, as such, the principle for telecommunications equipment is established at this location. As the existing phone box will be removed to make way for the new Street hub unit, this will result in a decluttering of the footpath due to the reduced footprint of the evolved unit and consequent enhancement of the area's visual amenity.

The site location is shown on the image below, highlighted by way of a yellow star for context.



The proposal would see the installation of a single Street Hub unit to be located on the footpath outside 31C Whitegate Drive (Dinners Ready), Blackpool, FY3 9AA (NGR: E-331793, N-436150). This forms part of a strategic package of applications submitted to Blackpool Borough Council for a number of Street Hubs located throughout Blackpool's existing streetscapes. It should be noted that these proposals for the installation of a number of Street Hubs will see with it the removal of existing, outdated and worn-down BT payphones, at no extra cost to the council. This would help in achieving the advancement and decluttering of the council's streetscapes, in line with the UK Digital Strategy, the National Planning Policy Framework, and the Blackpool Local Plan.

2.2 Street Hub Design and Dimensions

Street Hubs are free-standing structures featuring a fully accessible tablet interface and digital HD display screens on two sides. Overall Street Hub dimensions are 35cm deep and 123.6cm wide (reduced tapered footprint is 120.1cm), with a height of 298cm to maximize the Wi-Fi range without dominating the street. A narrow base limits the footprint while ensuring access to wheelchair users.

Street Hubs have been designed to be accessible to all users, regardless of their physical or technological capabilities, including:

- Tablet interface placed at 1m to provide easy access for wheelchair users
- Easy-touch 999 call button to ensure it can be used regardless of mobility restriction
- High-contrast large type labels
- TalkBack functionality facilitates full access to the tablet for all users
- Hearing induction loops integrated into each unit Intuitive touch screen interface.

Also, 'Next Generation Text Relay' makes Street Hubs even more accessible to those who are deaf, hard-of-hearing or speech impaired. Using the tablet callers can type words for a Relay Assistant to then speak to the call recipient. The Relay Assistant types back any responses to the caller, allowing for an effective two-way conversation.

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

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

Additionally, every Street Hub provides access to maps giving directions to nearby landmarks and services – a valuable resource for visitors or those without access to a smartphone. They also act as wayfinding boards, giving walkers and cyclists clear directions, and providing local advertisers the opportunity to give simple directions to their businesses.

This sponsorship will also cover the maintenance and servicing costs of the Street Hub. This is necessary to ensure the program remains financially sustainable. Displayed advertisements will comply with all advertising regulations and guidelines.

Further detail is provided in the attached Street Hub Product Statement and associated documents.

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

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

2.3 Application History

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

2.4 Alternative Site Assessment

Paragraph 115 of the revised National Planning Policy Framework, in which the Government's supportive stance towards developing high-quality communications infrastructure is laid out, states that "The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate."

In addition to this, Appendix A of the Code of Best Practice (2016) sets out the options for the siting and design of communications equipment. It explains that, "local planning authorities should support the expansion of electronic communications networks, including telecommunications and high speed broadband. They should aim to keep the numbers of radio and telecommunications masts and the sites for such installations to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used, unless the need for a new site has been justified. Where new sites are required, equipment should be sympathetically designed and camouflaged where appropriate."

As the proposal would see the removal of 1No. existing BT telephone box, it is considered that while the application is for the installation of a new Street Hub unit, works will be undertaken at an established telecommunications site and not for the development of a new site, thus the consideration of alternative sites is not appropriate in this instance. As a result, it is therefore considered that the principle of telecommunications development at this location would represent an acceptable form of development, consistent with Government guidance which seeks to encourage the use of existing sites, buildings and other structures for new electronic communications capability (including upgrading).

It should be noted that a major aim of the Street Hub rollout is to clean up the clutter of outdated phone boxes within the council's streetscapes. As such, by removing the existing 1No. phone box from the proposed location site and replacing it with a far-superior, technologically advanced Street Hub unit, the general locale will benefit from a system that aims to promote a safer and smarter city – as pursued by NPPF guidance. The application site, therefore, represents the only feasible option in this instance regarding relevant material planning considerations, by allowing the requirement to be met without the deployment of an additional site beyond the existing phone box in the locality.

2.5 The Blackpool Rollout

This application is part of a wider scheme of Street Hub deployment across Blackpool, with a number of locations identified for the installation of a Street Hub. All proposals for Street Hubs will also be the subject of applications for Express Advertisement Consent under the Control of Advertisement Regulations in respect of the 2No. LED digital display screens located on either face of the unit.

Initial pre-application consultation was sought with the Blackpool Borough Council through an explanatory email on 03/03/2022 outlining the sites we had identified as being suitable for the installation of a Street Hub.

A subsequent response was received from Blackpool Borough Council dated 14th March 2022, with feedback provided on each of the proposed site locations in respect of highway safety considerations, and also impact on local character. The written feedback details initial advice in terms of the principle of development as a whole and also specific to each of the proposed sites within the council-wide rollout.

Regarding the principle of development in relation to the Street Hub unit, the council raise concerns in relation to the physical appearance of the Street Hub unit, stating that:

> *"features wider than 300mm are generally considered to be an obstruction to visibility".*

Additionally, the Council suggested that the Hubs should be grouped with existing street furniture where practicable to minimize the visual impact on the streetscene.

The council also raised concerns surrounding potential distraction to motorists. The council suggest that due to potential impacts on vehicles and as they are intended for use by pedestrians, they should be installed parallel to rather than perpendicular to the road, thereby, allowing more space for pedestrians to pass.

Lastly, regarding highway safety, the council made the following comments:

> *"The Council will not accept proposals that would reduce a footway width to less than 1.8m,or would be closer than that to the kerbline. The existence of a forecourt would not be a mitigating factor as the Council cannot control their availability for pedestrian use. Furthermore, proposals within junction visibility splays (2.4m x 43m in both directions to the near kerb) would equally be resisted."*

The numerous concerns raised by the Council above will be addressed within Chapter 3 of this planning statement, specifically within Section 3.3 below.
Unfortunately, within their pre-application response, the council did not mention any of the numerous public benefits to the 'Street hub' product within their feedback and as such, have failed to provide any planning balance when assessing the proposal. The provision of Wi-Fi and phone facilities have tangible benefits to residents of the city, whilst the unit is also able to facilitate council and public messaging. Furthermore, there is a clear design benefit to upgrading outdated and obsolete equipment within the streetscene, and the provision of free charging, air quality monitoring and wayfinding functionality are a clear improvement to the existing phone kiosks that the Street Hubs are looking to replace.

In terms of the proposed site to which this application relates, the following advice was provided;

> *"This would present a visibility issue for the side road. It is unclear why both 208 and 209 would be necessary. BPL208 would be preferable."*

In respect of the feedback received specific to this site, this is assessed in more detail under Section 3.3 of this report below.

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

3.0 Planning Policy

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

3.1 National Planning Policy and Guidance

National Planning Policy Framework (July 2021)

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

In this regard the Framework can be summarised as follows:

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

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

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

- The starting point for planning new networks or the expansion of existing networks is therefore to use existing electronic communications sites as and when applicable;
- The emphasis on minimising environmental impact is greater per the sensitivity of the site. The emphasis on exploring and utilising site sharing opportunities is consequently higher in these circumstances;

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

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

to meet, for example, enhancement and improvement to existing communications infrastructure.

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

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

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

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

The importance of the proposed development in providing the upgrading and expansion of the existing communications 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.

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

Paragraph 7 advises that the purpose of the planning system is to contribute to the achievement of sustainable development. It then states that: "*At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs." [our emphasis]*;

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

Paragraph 38, on "decision-making" states that authorities should "*work proactively with applicants to secure developments that will improve the economic, social and*

environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible".

The NPPF builds on the aspiration to build a strong, competitive economy. Paragraph 81 states: *'Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking in to account both local business needs and wider opportunities for development. The approach taken, should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation[42]'*...

Footnote 42 of the NPPF states: *'The Government's Industrial Strategy sets out a vision to drive productivity improvements across the UK, identifies a number of Grand Challenges facing all nations, and sets out a delivery programme to make the UK a leader in four of these: artificial intelligence and big data; clean growth; future mobility and catering for an ageing society. HM Government (2017) Industrial Strategy: Building a Britain fit for the future'*.

As highlighted previously, the NPPF (2021) directly addresses the need for enhanced wireless communication services, first mentioned in paragraph 20, which states that an LPA's strategic policies must make sufficient provision for:

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

Leading on from this, paragraph 114 states that "*Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. Policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time……*". This wording echoes guidance set out in paragraph 42 of the 2012 version of NPPF. However, unlike the previous version it also includes the importance of reliable communications infrastructure for both economic growth and social well-being.

While supported, paragraph 115 of the NPPF retains the requirement to minimise the number of installations consistent with the efficient operation of the network but also includes being consistent with the needs of consumers and providing reasonable capacity for future expansion.

Paragraph 118 retains the guidance set out in previous versions of the NPPF version and states that "Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health

safeguards different from the International Commission guidelines for public exposure".

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

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

In the case of this proposal site, the installation of the Streethub unit would provide a modern, multifunctional alternative to the traditional 'mast' that would act as a communication hub within a dense urban area.

Code of Best Practice on Mobile Network Development in England (24 November 2016)

The Code of Best Practice has been fully revised in November 2016 and is now even more supportive of mobile network provision in line with Government aspirations that everyone should have access to the information super highway 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 (2013).

The principal aim of this Code is to ensure that the Government's objective of supporting high quality communications infrastructure, which is vital to continued economic prosperity and social inclusion for all, is met. The 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.

Section 2 of the Code highlights the Government's Communications Policy and Planning Policy. It acknowledges that the continued expansion and development of mobile networks is a key element of the National Infrastructure Delivery Plan 2016 – 2021. This recognises that digital communications are now a crucial component of everyday life, with improvements in connectivity being key to a vibrant economy (para 2.1). Paragraph 2.2 goes on to state that consumers, businesses and public bodies increasingly rely on mobile communications and expect to receive a signal wherever they are.

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, Section 2 of this Code also reiterates NPPF guidance in strongly supporting high quality communications infrastructure, which is seen as essential for sustainable economic growth.

Section 3 of this Code acknowledges that there are special operational and technical considerations associated with mobile network development, which have changed over time due to changes in technology and associated changes in demand. The Code acknowledges that there remains a reliance on radio masts to provide the main umbrella of coverage. Paragraph 3.1 explains that radio signals operate like light and must "see" over the target coverage area, they cannot be hidden and so there will always be a degree of visual impact. Paragraph 3.2 clearly indicates that in assessing the visual impact, greater emphasis than previously should now be placed on the radio planning requirements to achieve mobile coverage (as shown in the recent changes to permitted development rights, at the end of November 2016, and the reduced test in the most recent NPPF.

Paragraph 3.3 goes on to highlight that the [operator systems tend to be demand-led or to fulfil coverage obligations. With the ever-increasing demand for data hungry applications available to a range of connected devices, such as smart phones and tablets, the requirement to upgrade and improve networks through changes to existing sites and the development of new sites is constant. As most parts of the country move on to a superfast highway, so the need to bring coverage to 'not spots' (i.e. areas where there is no mobile coverage from any operator) and improve coverage in 'partial not spots' (i.e. where there is some coverage but not from all operators) intensifies. Paragraph 3.4 of The Code provides advice to local Planning authorities who are concerned about proposals, stating that they should not 'look for problems' but should work proactively with the Mobile Network Operators to find solutions, in line with the aims of the NPPF.

Section 4 of the Code sets out the evolution of mobile networks from 2G voice calls and text to 4G superfast mobile broadband which are now approximately the same speeds as fixed broadband connection. Paragraph 4.1 of the Code acknowledges that customer expectations have evolved with technology. The expectation is that they will always be connected and able to access services in exactly the same way as fixed broadband for personal, educational and business purposes. Paragraph 4.2 acknowledges that data, i.e. using the internet, puts increased demand on capacity and therefore the need for additional base stations to keep abreast of customer demand. Also, 3G base stations, originally using higher frequencies didn't travel as far and therefore each base station covered a smaller area. However, changes in working practices for the operators, in line with national guidance, streamlining networks, sharing base stations has reduced the overall amount of infrastructure required.

The Code goes on to acknowledge that operators maximise the use of their existing network infrastructure for the provision of 4G services and are similarly upgrading their 3G network infrastructure to improve capacity and coverage. However, the revised

Code continues to advise that this does not mean that there will not be a need for any new base stations. Indeed, for example, more base stations will be needed in areas where there has previously been only limited or no coverage and where coverage and capacity needs to be enhanced in line with Government commitments and customer demand. Similarly, some new sites will be required to replace existing sites that are lost, for example, through redevelopment of an existing building. Some masts may need to be redeveloped or replaced to enable an upgrade in services to take place.

Section 5 relates to mobile connectivity in the 21st Century, explaining that mobile phones and other devices are now everywhere. Mobile connectivity is not just making calls and texts but also mobile broadband. The majority of mobile phones in the UK are Internet enabled smartphones and large numbers of people also now own tablet devices. People are increasingly choosing to access the internet using a mobile device even when they have fixed broadband connection available.

The Code acknowledges that by the second decade of the 21st Century, the greatest increase in traffic across mobile networks was in data i.e. internet use (para 5.3). Paragraph 5.4 states that in terms of the wider economic impact of mobile connectivity, research by Deloitte on the economic impact of mobile broadband across a range of countries, showed that a doubling of mobile data use leads to an increase of 0.5% in the Gross Domestic Product per capita, while another study put the benefit of 4G mobile broadband to the UK economy at £75 billion over a decade. Section 5 of the Code goes on to highlight that connectivity promotes social inclusion. In recent years, more people rely on a mobile phone than they rely on a landline. Furthermore, people on lower incomes are even more likely to live in a mobile only household, or to access the Internet using a mobile connection (para 5.5).

The Code illustrates that mobile connectivity helps in the delivery of public services e.g. to access Central and Local Government via online services, acknowledging that lives are more likely to be saved when a 999 call is made from a mobile than from a landline, Telehealth is becoming increasingly important and text message reminders also improve compliance with medication and keeping NHS appointments.
Good mobile connectivity also promotes sustainability e.g. it reduces the need to travel and thus carbon emissions (para 5.7). The Code continues to support mobile telecommunications network as it is seen as a crucial piece of national infrastructure in economic, community and social terms (para 5.8). Paragraph 5.9 states that there is a need to continually upgrade and improve mobile networks, which will not function without the necessary infrastructure on which they rely. This is driven by increasing consumer demand for data, improved connectivity and more capacity, together with Government aspirations for improving connectivity and coverage.

Section 7 of the Code sets out the need for all agencies to work together to deliver connectivity that is essential to the country's economy and society including Central Government which provides the overall strategy for connectivity, mobile operators to deliver the mobile network development through the planning system and helping to identify land and structures suitable for mobile infrastructure. Local Planning authorities can also ensure that the planning function works in tandem with other relevant departments and agencies such as their own economic development

departments and appropriate digital connectivity teams in order to facilitate digital connectivity.

The Code provides guidance on siting and appearance principles at Appendix A. It sets out a number of design principles in respect of telecommunications development. However, the code acknowledges that the options for design used by an operator will be affected by site conditions including requirement to link the site to the network, landscape features and coverage and capacity requirements. The main options for the operator include:

- Mast and/or site sharing (including redevelopment of a site to enable upgrade or sharing with another operator)
- Installation on existing buildings and structures;
- Erecting new ground-based masts;
- Camouflaging or disguising equipment where appropriate;
- Using small scale equipment (although small cells themselves are generally used to address capacity issues as opposed to providing coverage) - [**OUR EMPHASIS**];

The proposal looks to provide this, with the BT Streethub unit providing additional small-cell capability in a street setting to provide infill coverage to the local area for residents, visitors and businesses alike. Additionally, free Wi-Fi connectivity would also be provided as part of the units provisions

Proposed Reforms to Permitted Development Rights to Support the Deployment of 5G and Extend Mobile Coverage (August 2019)

Although the application does not benefit from current permitted development rights based on the increase in width for the replacement mast of more than a third that of the existing mast, the applicant is mindful of the recent government support for the development of digital connectivity set down within recent consultation on changes to permitted development rights.

Important text states that the Government recognises that widespread coverage of mobile connectivity is essential for people and businesses. People expect to be connected where they live, work, visit and travel. The Government is committed to extending mobile geographic coverage further across the UK, with continuous mobile connectivity provided to all major roads.

As well as improved mobile signal, 5G networks are also crucial to drive productivity and growth across the sectors that local areas are focusing on through their emerging Local Industrial Strategies. Enabling and planning for 5G implementation is central to achieving the Government's objective to deliver prosperity at the local level and enable all places to share in the proceeds of growth.

The Government is determined to ensure the UK receives the coverage and connectivity it needs. The Future Telecoms Infrastructure Review, published in July

2018, sets out the Government's long-term strategy for meeting its digital connectivity targets. It restated the Government's commitment to tackling barriers to deployment and concluded that there were steps the Government could take in order to create the right conditions for the investment required to deliver additional network coverage and capacity.

The Government wants to be a world leader in 5G, the next generation of wireless connectivity, and for communities to benefit from the investments in this new technology. All of the four main mobile network operators have announced intentions to begin deployment of 5G networks in 2019 and the current application is a manifestation of this commitment.

The case for 5G is compelling as it will bring faster, more responsive and reliable connections than ever before. More than any previous generation of mobile networks, it has the potential to improve the way people live, work and travel, and to deliver significant benefits to the economy and industry through the ability to connect more devices to the Internet at the same time – creating the so-called "Internet of Things". This will enable communities to manage traffic flow and control energy usage, monitor patient health remotely, and increase productivity for business and farmers, all through the real-time management of data.

3.2 Local Planning Policies

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

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

- Blackpool Local Plan - Part 1: Core Strategy (2012 – 2027) - Adopted January 2016
- Blackpool Local Plan - Part 2: Site Allocations and Development Management Policies – Submitted for examination - 18 June 2021
- Blackpool Local Plan 2001-2016 – Saved Policies

The Blackpool Core Strategy is a key planning document for Blackpool that sets out where new development (including housing, employment, retail and leisure) should be located to meet Blackpool's future needs to 2027. It also identifies areas which will be regenerated, protected or enhanced and sets out the key development principles such as design and affordable housing. Unfortunately, there are no telecommunications specific policies within the Core Strategy.

Furthermore, part 2 of the local plan (Site Allocations and Development Management Policies) allocates sites for development, safeguarding or protecting and sets out a suite of development management policies to guide appropriate development. On the 18 June 2021, the Local Plan Part 2 and its supporting documents were submitted by the Council for independent examination to the Secretary of State for Housing, Communities and Local Government via the Planning Inspectorate. Given the current stage of these policies within the examination process, Part 2 of the Local Plan would hold no policy weight in determining the outcome of this proposal.

Finally, the Blackpool local plan 2001-2016 (adopted in 2006) sets out the council's existing policies and proposals for the way in which land, buildings and infrastructure should be developed, however, it will eventually be replaced in full once the Local Plan Part 2: Site Allocations and Development Management Policies Document has been adopted. For the time being, a number of policies in the 2006 Local Plan will continue to be 'saved' until the Local Plan Part 2 is adopted. Within these saved policies, Policy LQ15 – Telecommunications Development, is of relevance when assessing this proposal:

> *"LQ15 Telecommunications Development*
>
> *Proposals for telecommunications development will be considered having regard to the visual impact on the built and natural environment and the technical and operational requirements of the equipment and will be permitted provided that:*
>
> *(a) there is no available, suitable alternative site, structure or building that meets the technical and operational requirements and would result in a significantly reduced visual impact and that there is no reasonable possibility of sharing existing facilities*
>
> *(b) the development is sited and designed so as to minimise its visual impact*
>
> *(c) the scheme includes satisfactory proposals to ensure that the site would be restored to its original condition once the development ceases to be used and its use is unlikely to be resumed*
>
> *(d) applicants provide certification that the proposed development meets the ICNIRP guidelines for public exposure or any subsequent government guidelines"*

Furthermore, the following paragraphs further develop the above policy:

> *"4.55 To limit visual intrusion the numbers of radio and telecommunications masts should be limited to the minimum consistent with the efficient operation of the network. Applicants for new masts should show evidence that they have explored the possibility of, firstly, sharing masts or sites and, secondly, utilising an existing structure or building. Only*

once these two options have been explored, should the possibility of a new mast be considered.

4.56 Where a new mast is required it should preferably be located within industrial/business estates or other areas where the mast will be seen in the context of groups of substantial buildings, and where its visual impact on the streetscene will be minimal. Isolated new masts within sensitive environments such as the Green Belt, Marton Mere SSSI designated Countryside Areas, Site of Nature Conservation Value or other areas of public open space will require special justification beyond that required for new masts in other locations.

4.57 In considering the design of an individual development, and particularly any mast development, careful consideration should be given to screening and planting. Innovative design solutions will be encouraged.

4.58 Mobile phones and their base stations transmit and receive signals using electromagnetic fields (EMFs). The public have become increasingly aware of the presence of EMFs, and concerned that exposure may have possible adverse effects on health. Operators have responsibility under health and safety legislation. It is not for the Council to seek to replicate through the planning system, controls under the health and safety regime. The Health and Safety Executive are responsible for the monitoring of radiation levels and the safe operation of sites. Government guidance on telecommunications, set out in Planning Policy Guidance Note 8, also requires operators to ensure that all new mobile phone base stations meet International Commission on Non-Ionizing Radiation Protection (ICNIRP) guidelines for limiting exposure to EMFs. Applicants will be required to provide certification demonstrating that the proposed development will meet ICNIRP guidelines when operational."

3.3 Planning Assessment

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

The aim to replace existing BT payphones with the improved Street Hub units will generally enhance the public realm and many streetscapes, whilst providing free digital connectivity and other services at no cost to the Council, to enrich the users experience of moving through this public realm. The advantage in terms of advertisement will remove the display of many adverts with deemed consent on existing phone boxes, replacing them with modern LED digital displays to which the Council will benefit from 5% free screen time (circa 438 hours a year per display or 876 hours per unit), all of which will be properly maintained and can be controlled through the requirement for express consent. The adverts will help support this function and as such are in intrinsic part of the development.

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

In line with the requirements of the NPPF and Code of Best Practice, the proposal would see the conversion of an existing and established communications site to a more contemporary designed and multifunctional unit, in fitting with the modern world. This in itself is not a valid reason to conclude that it is not appropriate at the specific location. However, it is accepted that this in itself is not the sole consideration assessing whether the proposal would be considered as being appropriate at the specific location.

Paragraphs 3.2 – 3.3 of the Code of Best Practice explain that there is now far greater emphasis that visual impact should not override requirements to achieve infrastructure coverage to a particular area, particularly with the need to support the massively growing and intensifying demand for mobile communications across the UK. Indeed, in terms of looking to meet operational needs, the Code of Best Practice emphasises that the NPPF now applies a reduced policy test compared to previous guidance. This helps clarify than an operator is only required to satisfy the normal test of acceptability having regard to all material planning circumstances, rather than looking for the 'optimum' solution as required under the former PPG8.

In this respect, by converting the existing structure, the visual amenity of the area would not be detrimentally or demonstrable impacted upon to any significant further degree. When considering the long-established use of the site for communications, this would ensure any such upgrade and conversion remains acceptable in terms of any resultant visual impact. This is in line with the requirements of NPPF which supports equipment which is sympathetically designed and keeps the number of masts to a minimum [paragraph 113] and The Code of Best Practice.

In terms of the Councils Placemaking and Sustainability strategy, the proposal would assist in the delivery of a Connected Place. Street Hubs are free to use, fully accessible community assets connecting and improving local streets in urban areas. At no cost to taxpayers or end users, Street Hubs provide communities with an unprecedented suite of essential urban tools with the consequence of the economic and social benefits that come from this.

When assessing the application site in terms of impact on visual amenity and pedestrian safety, the following comments are made.

There is existing street furniture typical of a busy urban high street including bus shelters, street lighting, road signs, signage/advertising, refuse bins and existing BT payphones. As the proposal would result in a replacement of existing BT infrastructure which has been a long-established feature within the streetscene with a new modern

design Street Hub, with a significantly reduced footprint and overall volume to that of the existing phone box to be removed, the proposal would therefore not result in any increased visual and/or physical clutter within the general streetscene. To this end, given that the proposed unit has only a small width increase from that of the existing phone box of circa 300mm, it is not considered that the proposal would have any resultant impact in respect of pedestrian safety or flow as there would be a remaining footpath width of circa 7.2m in this instance – 5.4m more than the minimum 1.8m required by the council. Additionally, while the council have indicated a preference for the Street Hubs to be positioned parallel to rather than perpendicular to the road, it is vital from a pedestrian safety standpoint that the units are installed perpendicular to the road. This is so that when using the control panel, pedestrians are positioned a sufficient distance from any passing vehicles, with the unit providing a buffer between passing vehicles and operators.

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

Regarding specific feedback provided by the Council on this site as part of their pre-app feedback, it was highlighted that the Street Hub would present a visibility issue for the side road, however, this is contended as the existing telephone kiosk is positioned the same distance from the kerb as the proposed Street Hub unit will be. Furthermore, it is important to consider the presence of on street parking adjacent the footpath on Whitegate Drive. As vehicles are often parked in the designated spaces here, this presents an obstacle to drivers sightlines that extends far beyond the edge of the kerb, and as such, by positioning the street hub on the footpath 500mm from the kerb, this would present no greater detrimental issue to drivers sightlines when exiting the junction as vehicles would have to creep on to Whitegate Drive to see any oncoming traffic past these parked vehicles.

In addition, the Council questioned the need for two Street Hub locations on this stretch of Whitegate Drive (BLP-208 and BLP-209) and suggested that BLP-208 would be preferable. As with the existing telecommunications infrastructure present on the footpaths at both locations, BT have identified a need and demand for telecommunications infrastructure at both locations, and as such, as part of essential upgrading works to modernise BT’s existing public call box estate, it is proposed that both existing kiosks be converted into Street Hubs.

In respect of amenity consideration, as stated the proposal would see the removal of an existing and somewhat run down phone box that could be considered as having a negative impact on the streetscene setting, with a new modern Street Hub unit. The proposed Street Hub has a much more slender and slimline profile than that of the existing phone boxes and would therefore be comparable in form and appearance to existing freestanding units of a similar form than that can be found elsewhere within the Council area. This was considered in a recent appeal decision (ref: APP/Z5630/H/3209488) for a similar structure to that being proposed whereby the Inspector determines the following;

> *"Therefore, due to the smaller footprint and slender profile of the proposed kiosk, the proposal would not be visually intrusive or create visual street clutter. The proposal would also not represent an incongruous addition due to its similarities with the existing digital signs within the town centre." (Appeal ref: APP/Z5630/H/3209488, 2-6 Fife Road, Kingston upon Thames).*

This consideration was reiterated in a further appeal (ref: APP/N5660/W/18/3199793) for a similar proposal, whereby the Inspector considered the following;

> *"..with the modest scale of the proposed InLink unit I find it difficult to accept the argument that the development would be perceived as having an adverse effect on visual amenity…" – (Appeal ref: APP/N5660/W/18/3199793, Waterloo Station, Lambeth).*

Furthermore, the council suggested in their pre-app response that the Street Hub units would present a potential distraction to motorists, however, this line of reasoning has previously been overruled by the planning inspectorate in another appeal decision (ref: APP/N5660/W/18/3199793) and as such should not be given any weight when assessing the impact of the proposal on the wider streetscene:

> *"Notwithstanding the comment of TfL that the advertisement display would distract drivers (a view not shared by Lambeth Transport), the Notice of Refusal makes no mention of an adverse effect on public safety." – (Appeal ref: APP/N5660/W/18/3199793, Waterloo Station, Lambeth)*

In addition to the above, while the site is located within the boundary of the Conservation Area, in assessing any proposal consideration has to be given as to the existing streetscene setting. In this regard, along with the existing and run down telephone box, there are numerous example of street furniture of a similar nature to that being proposed, which should be considered when assessing any potential impact on the setting and/or appearance of any heritage assets. As a result, the character of the Conservation Area in this instance, with particular regard to street level, is not exclusive of similar structure to that being proposed and therefore the proposal in this instance should not be considered as being visually incongruous within the existing streetscene setting or that of the wider Conservation Area. Unlike many previously accepted forms of street furniture within the locale and surrounding Conservation Area, as the proposal would see the removal of a bulky, outdated and in somewhat of a state of disrepair phone box with a much slimmer profile modern structure, then there is an

argument to be made that the proposal would in fact result in a visual enhancement of the Conservation Area in this regard, particularly as it would not be, even if considered on its own, as being out of appearance with similar units within the streetscene.

However, if the Council consider that there would be some harm to the setting of the heritage asset in this instance, any such harm would be, at worst, considered as being *'less than substantial'*, whereby the NPPF under Paragraph 202 states that 'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including…..'. Such benefit, while set out within the supporting documents submitted in support of this application, are considered in more detail below.

In considering the above, the proposed location would represent the best solution in terms of material planning considerations in this instance.

In respect of digital infrastructure and economic development, these new Street Hubs are the perfect form of infrastructure for positive change, enabling councils to collaborate and configure infrastructure to support smarter, safer and more sustainable places for residents, visitors and businesses alike. BT is moving public connectivity forward, evolving their existing and long-established payphone estate further with a move from the 1st Generation 'InLink' units that have seen deployment throughout the country, to the proposed Street Hubs, a sleek modern answer to the demands of a digitally connected, converged-media society and at no cost to the Council.

As such, it is considered that the proposal would not be contrary to the respective Development Plan policies and would also be consistent with National Policy consideration in this instance.

Economic and Social Benefits

The NPPF strongly supports sustainable development as does the Council's Core Strategy. Mobile communication plays a significant role in sustainable development. Being able to access the internet via a mobile device allows people to access a wide range of central and local government services, buy groceries, manage finances, apply for jobs/university and carry out school projects, send emails, download applications, send and receive instant messages, streaming and downloading data to name just a few of the benefits of being able to use an internet enabled handheld device. It also allows people to work from home or on the move without the need to return to the office. This reduces travel time, carbon emissions and increases the speed in which information is processed/shared. This fully complies with the aims of the NPPF and the Council's Core Strategy to minimise the effects on climate change by reducing the need to travel and as a consequence the carbon footprint.

It is therefore clear that the Government places significant importance on reliable communications and as such the Planning Inspectorate gives significant weight to the public benefit arising from local service provision. The issue of benefits and planning balance is considered in Appeal Ref: APP/L1765/W/18/3197522 (Land at the junction

of Andover Road and Athelsan Road, Winchester for the erection of a 17.5m street works pole).

The Inspector found at Paragraph 9 'The Government places a high priority on the provision of high quality communications. The National Planning Policy Framework (the Framework) at Paragraph 112 states, *"Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections".*

In addition to the above, this issue of public benefit and planning balance was also considered in Appeal Ref: APP/X5990/W/3162918 (55-59 Oxford Street). In this case, the Inspector found at Paragraph 20 *'Whilst I have paid special attention to the desirability of preserving or enhancing the character or appearance of the conservation area, the above factors lead me to conclude that there is less than substantial harm to the character and appearance of the existing building and the SCA. Therefore, whilst there is some conflict with WCP and UDP policies, the less than substantial harm that I have identified is outweighed by the clear public benefits of the proposal in maintaining and improving vital communications infrastructure at an important location'.*

Mobile connectivity is essential to the future success of the economy. The combined value of 4G and 5G mobile connectivity is estimated to add £18.5bn to the economy by 2026 (Councils and Connectivity Sept 2018). Mobile connectivity is essential to creating a better society. Digital inclusion can help people gain employment, become more financially secure and improve health and well-being. Mobile connectivity is also essential to fulfilling the potential of new technologies. Innovation such as artificial intelligence and connected cars will change how we work, spend our leisure time and run our public services.

Paragraph 38 of the NPPF (2021) states that:

'Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible'.

Providing high Quality digital infrastructure within the area fully meets this aim of the NPPF. The social and economic benefits are significant material considerations which should be weighed against any visual impact associated with the proposed development at this location, whether a conversion or relocation as is the case in this instance. In addition to the above, HM Treasury outline such benefits in its report 'Fixing the Foundations: Creating a more Prosperous Nation' (July 2015). Paragraph 7.1 states that reliable and high quality fixed and mobile broadband connections support growth in productivity, efficiency and labour force participation across the

whole economy. They enable new and more efficient business processes, access to new markets and support flexible working and working from home.

Paragraph 7.2 goes onto highlight strong support for high quality communications infrastructure. It states:

'By reducing regulatory red tape and barriers to investment, the government will support the market to deliver the internationally competitive fixed and mobile digital communications infrastructure the UK's businesses need to thrive and grow, and which will enable the UK to remain at the forefront of the digital economy. The government is working with business so that the market can play the lead role in delivering against the ambitions set out in the Digital Communications Infrastructure Strategy, published in March, of near-universal 4G and ultrafast broadband coverage'.

Indeed, MPs have noted in parliament that the UK's Superfast Broadband connectivity was 'relatively poor'. As such, there has been continuing and growing strong national support for a high quality communications infrastructure that is fit for purpose and helps promote the UK as a world leader in this regard, particularly with the roll-out of 5G coverage.

Further to Governments commitment to improve connectivity, on 24th November 2016 the new 'permitted development' rights for telecommunications operators came into force, designed to lift the restrictions on mobile operators such is the significance of the significant weight that Government places upon the benefits attached to modern connectivity.

In October 2016, there was also the BIG Infrastructure Group (as chaired by MP Grant Shapps) Report release calling on operators to improve their network. This is signed and has comments from numerous MP's nationally. A National Needs assessment – A Vision for UK Infrastructure was also published in October 2016. It sets out the infrastructure needs for the UK which includes the importance of digital technology. An extract of this assessment can be found below:

'A lack of sufficient digital connectivity has a detrimental effect on business operations, productivity and output and hence competitiveness in the global marketplace. Securing digital connectivity is thus critical to the UK's long term prosperity. A key challenge for the digital sector is a persistent digital divide between those who have access to the latest technologies and those who do not, with resulting social and economic exclusion, particularly as dependence on e-services and digital communications increases'.

The Assessment goes on to note that 'Universal digital connectivity would serve as an equaliser of economic opportunity in that it enables participation in a modern digital economy'. This Assessment goes on to further explain the consequences of a lack of coverage and the effects this has on social and economic prosperity. This clearly highlights the importance of maintaining high quality 2G, 3G and 4G coverage to this busy area a short distance to the east of the capital, where the social and economic benefits significantly outweigh the environmental considerations.

Ministers from the DCMS and MHCLG wrote to all CEOs of the Council's in England (March 2019) setting out the position in respect of supporting investment in high-quality, reliable digital connectivity. The Government acknowledges that such infrastructure is essential for communities to benefit from faster economic growth and greater social inclusion. Ministers state:

'it is essential to keep pace with growing demand for internet bandwidth and mobile data from local businesses, residents and those who visit our communities. As outlines in the Future Telecoms Infrastructure Review, the Government would also like to see national full fibre coverage by 2033. We would also like the UK to be a work leader in 5G, with the majority of the population covered by a 5G signal by 2017. We are writing to ask for your help in supporting the investment necessary to achieve these objectives.

Recent years have seen substantial investment in mobile and fixed digital infrastructure across the UK. While mobile coverage across the UK has been significantly improving, there are still too many areas where coverage is poor. The UK has now achieved 95% superfast broadband coverage but still only 6% full fibre coverage.

We need to create the market and policy conditions to support the large-scale commercial investment required to extend and future-proof digital connectivity. A key part of this is making it easier for operators to deploy infrastructure. To help to achieve this, the Government recently reformed the Electronic Communications Code – the statutory framework which underpins agreements between communications network providers and those in both the private and public sectors who can provide sites for the installation of network equipment. The purpose of the reform was to make it easier and more cost effective for communications network providers to deploy and maintain digital infrastructure.

Local Authorities have an essential role to play as site providers. As Chief Executives, you can support investment in digital communications infrastructure by ensuring your organisations have policies and procedures in place that promote effective engagement with the digital communications industry and minimise barriers to deployment'

The proposed conversion will continue operators to provide high quality coverage and capacity, supporting the Government's aim to 'focus on ensuring everyone is connected to the information highway'. This fully meets the aspirations of the NPPF and the Council's strategic strategy in general terms.

Trials have already begun across the UK to demonstrate the potential of 5G and improved digital infrastructure and how it can improve and drive productivity and efficiency. In June 2019, West Midlands 5G partnered with BT and University Hospitals Birmingham to trial the UK's first 5G Connected Ambulance. Real-Time communications between the paramedics and the hospital doctors enabled the effective diagnosis of the patient at an early stage of care. The trial showed how a paramedic performed a remote-controlled ultra-sound scan on a patient in an

ambulance over a public 5G network. These trials show how digital connectivity and technology can reduce patient waiting times and save lives (Source: WM5G).

The way digital infrastructure works, it is closely connected with the Smart City agenda and will enable centralized control of lots of different street infrastructure owned or managed by councils, such as street lights, water meters and bus stops. Blackpool Borough Council is fully committed to being connected and acknowledges the benefits derived from this. As such it needs the 21st century infrastructure to enable this objective to become a reality. A conversion at this location enabling modern communication service provision to the surrounding area will ensure that this aspiration is fully met.

Reliable mobile connectivity and digital infrastructure is essential. It is however certainly more significant now since the global pandemic hit. Online Nation 2020 produced by Ofcom to look at what people in the UK are doing online and industry trends amongst other things, found in relation to the increasing importance of mobile connectivity:

- 71% of all measured time spent online was on smartphones.
- 35% of internet users only accessed the internet on mobile devices (smartphone or tablet).
- In 2020, a fifth (22%) of UK adults have a smart speaker in the home and 11% of all UK households own some kind of 'smart home' technology (including devices such as smart home security, smart lighting and smart heating).

Reinforcing the importance of mobile connectivity during the pandemic, the Online Nation 2020 report found:

- Covid-19 impact: time spent online reaches record levels
- In April 2020, internet users in the UK spent an average of 4 hours 2 minutes online each day, 37 minutes more each day per online adult compared with January 2020.
- In April 2020, the reach of education (+3 percentage points), health (+5pp) and government (+5pp) sites had all grown since January
- … between January and April 2020; Houseparty increased from 175,000 to 4 million; Zoom reached 13 million adult internet users in April, up from 659,000 in January.
- In February 2020, 73% of UK adult internet users used online text messages, 54% use online voice calls, 35% use video calls and 55% use emails, at least weekly. Nine in ten adult internet users used any of those four services at least weekly.
- Most internet users use online messaging and calling services and use increased during the coronavirus pandemic
- Until early this year, online video calling was used much less than other online communication services, with 35% of online adults using online video calling at

least weekly in the 12 months to February 2020.26 In May 2020, this had doubled to 71% of online adult consumers using online video calling services at least weekly, with 38% using them at least daily. Our research suggests that 7% of adult internet users used video calling for the first time as a result of the coronavirus pandemic.

- 87% of the UK adult population use the internet • Mobile only use has increased dramatically
- In 2019, … the proportion who use only mobile devices has shot up: 35% of internet users accessed the internet solely via a smartphone or tablet in 2019 – a 10 percentage point (pp) increase compared to 2017. Across computers, tablets and smartphones, 71% of time spent online in September 2019 was on smartphones.

In March 2020, when OfCom finalised the rules for the next mobile airwaves auction, Philip Marnick, Spectrum Group Director at Ofcom noted 'Demand for getting online, on the move is soaring, with mobile customers using nearly 40% more data year on year. So, releasing these airwaves will bring a much-needed capacity boost – helping mobile customers get a better service. We're also releasing more airwaves to help cement the UK's place as a world leader in 5G.' this is also the case for improved digital infrastructure

It is clear from the above that reliance on mobile connectivity was increasing before COVID 19 and has increased since the pandemic. It is fair to say the increased use of and expectation for reliable mobile digital connectivity will see this upward trend continue. Residents, businesses and commuters will all be significantly affected if the critical replacement infrastructure is not permitted.

It is therefore imperative that the operator continues to invest in ensuring that the latest technologies are available on its network, so that customers are able to continue to use their handheld devices wherever they are, for whatever reason, for the purposes in which they were purchased.

Providing the latest digital infrastructure to enable improvements in digital technology empowers and enables residents to have the highest quality of life, supports the creation of high quality jobs and achieves the maximum productivity levels. It will help England achieve its ambition of being a world-leading digital country and one which its businesses, public service providers and citizens are using digital technology by default and to the fullest to grow their businesses and improve productivity to access skills, training and employment opportunities to address global challenges that have a local impact such as ill health, social isolation, and pollution; to improve living standards and well-being; and to improve the quality and value for money of public services. This is in full accordance with the Blackpool Local Plan.

5G and improved digital infrastructure will provide faster and more reliable connectivity leading to greater opportunities. We will experience new technologies that will help us become more efficient and save costs as an individual or business. Advanced healthcare facilities performing surgeries remotely will be made possible along with

freeing up more GP time through better online facilities improving health and social care. It will allow the greater Internet of Things (IOT) transformation, with better connected devices, the IOT will enable us to control devices more independently, it will help councils and businesses deliver services more efficiently including transport and logistics with connected parcels and fleet tracking; environmental monitoring with sensors monitoring air quality and water pollution in real time; smart retailing; industrial applications, enabling business to improve productivity e.g. through predictive maintenance and real-time analytics.

A National Needs Assessment – A Vision for UK Infrastructure was published in October 2016. It sets out the infrastructure needs for the UK which includes the importance of digital technology:

> *'A lack of digital connectivity has a detrimental effect on business operations, productivity and output and hence competitiveness in the global market place. Securing digital connectivity is thus critical to the UK's long term prosperity. A key challenge for the digital sector is a persistent digital divide between those who have access to the latest technologies and those who do not, with resulting social and economic exclusion, particularly as dependence on e-services and digital communications increases' (page 66 A National Needs Assessment)'.*

The Assessment goes on to note that 'Universal digital connectivity would serve as an equaliser of economic opportunity in that it enables participation in a modern digital economy'. Therefore, this Needs Assessment further explains the consequences of a lack of coverage and the effects this has on social and economic prosperity. This clearly highlights the importance of providing new 5G coverage to this urban area of Blackpool where the economic benefits will outweigh social and environmental considerations.

Practical Applications of 5G Connectivity as Example of Material Socio-Economic Benefit:-

Education:

The relationship between 5G and education is evolving at a massive rate with educators exploring the relevance of Virtual Reality (VR) technologies for education and training. Crucially, VR can support remote learning, allowing students a presence in the classroom even when working elsewhere.

5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high definition images and video), increased capacity and heightened security will also allow learning on the job, thanks to technologies such as Augmented Reality (AR) goggles, which can give engineers real-time instructions on how to fix a machine on a production line, for example.

Health:

Patients across the country are now becoming accustomed to relying on remote healthcare services such as NHS 111, virtual GP appointments, and ordering online deliveries of essential medical supplies.

5G will prove critical in providing the infrastructure required to deliver remote health services over the next decade. By design, 5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high definition images and video), increased capacity and heightened security are going to be fundamental in scaling the patient benefits of remote healthcare and keeping medical records secure and private. For instance, trials have shown that connecting ambulance crews to expert resources using 5G allows paramedics to work with doctors and conduct specialist procedures in real time whilst on the road.

The proposed conversion will continue operators to provide high quality 2G, 3G and 4G coverage and capacity, as well as 5G when applicable, supporting the Government's aim to 'focus on ensuring everyone is connected to the information highway'. This fully meets the aspirations of National Policy and the Council's Local Development Framework.

4.0 Maintenance and Servicing

Maintainability and durability were key considerations in the design, with regular cleaning and servicing planned. BT is responsible for the management of Street Hub services with each unit physically inspected weekly across the estate.

Inspection Regimes

The Street Hubs are visited every two weeks for cleaning, by hand and with pressure washers. The materials used make this process easy with defined materials and processes. Whilst cleaners are on site, they check for damage and ensure the tablets and screens are working. In addition, BT's in-field quality inspection teams visit at least every two weeks on an alternative schedule to their cleaning team, performing several checks including (but not limited to):

- Full walk-around with supporting photos to check for damage, graffiti and black screens
- Functionality checks on the tablet to test calls, maps, 999 and USB charging.

BT can also send out emergency visits if reported as necessary by internal sensors.

Monitoring and Repair Management

Street Hubs are monitored remotely 24/7, with this being the primary mechanism to spot faults with the above local inspections ensuring the effectiveness of this monitoring. Once identified, BT have processes to resolve issues within agreed service levels. Most will be resolved within three working days, with safety and power issues having a more rapid resolution target than cosmetic issues like graffiti.

Design Materials

High-quality materials have been used to ensure longevity, holding up to abuse and diminishing scratches. These include:

- A galvanised mild steel structure, powder coated external grade aluminium exterior
- Painted powder coated aluminium main casing – attractive, durable, easy to service, and cooling
- Displays fronted by tempered and laminated glass to reduce glare
- RF transparent radio compartment

The modular design of exterior and interior components makes servicing simple and economical.

Future Upgrades

BT plan to make changes as needed to address identified faults or to improve services. Whilst some may involve physical attendance at the unit, the majority will be done remotely via software upgrades. All updates are rigorously quality assured before release.

5.0 Health and Safety

Telecommunications planning guidance states that it is not for the local planning authority to seek to replicate through the planning system controls under the health and safety regime as it is a matter for the Health and Safety Executive.

The Government guidelines state that provided a proposed base station meets the ICNIRP guidelines for public exposure, then it should not be necessary for the local planning authority to consider the impacts of health concerns.

The proposed Street Hub will not be fitted with small cell technology integrated inside the unit casing. When BT do opt to implement small cell technology within this Street Hub, however, this will be managed through the submission of a license notification under Regulation 5 of the Conditions and Restrictions of the Communications Act 2003 (as amended) in respect of upgrading works to an existing telecommunications mast. This will be the chosen route as these works constitute permitted development under Class A of Part 16 of The Town and Country Planning (General Permitted Development Order) 2015 (as amended). Regardless of the absence of small cell technology upon deployment, an ICNIRP certificate is attached to this application to confirm that the equipment complies with both national and international emissions standards and that the proposed design and location allows the equipment to be well within the parameters set by the ICNIRP standard.

6.0 Conclusion

The Street Hub, in providing free Wi-Fi connectivity, improved 4G and 5G coverage, air quality monitoring and other valuable services to shoppers, tourists and others (thereby encouraging greater use of the city centre and enhancing recreational areas) is part of the wider digital connectivity expected in modern cities. It is precisely the type of high-speed digital infrastructure that the government is seeking to support as part of the presumption in favor of sustainable development.

The proposed Street Hub is considered to gain support in terms of its location for Wi-Fi connectivity, and its appearance in terms of overall impact on the existing streetscene. Street Hubs are of a high quality, accessible design that would be a significant improvement over the existing payphones in the Council's area, along with the associated direct public benefits including;

- Ultrafast public and encrypted Wi-Fi
- Access to public services
- Multiple accessibility options
- Powered by 100% renewable carbon-free energy
- Inspected weekly and cleaned at least every two weeks, monitored 24/7
- Secure power-only USB ports for rapid device charging
- Free phone calls Direct 999 call button
- Display community and emergency (i.e. police) awareness messaging
- Environmental sensors to measure air quality, noise, traffic and more.
- Improved 4G and 5G coverage to local communities
- 876 hours of free council advertising per unit per year

As such, the Council should support the proposal in the interest of the significant public benefits which would outweigh any harm caused when weighing up all material planning considerations. Both the planning application and accompanying application for advertisement consent should be timeously approved, with appropriate conditions attached if necessary.