Solutions30
Solutions for New Technologies

Our ref: GRW009

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Planning Department
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19/05/2022

Dear Sir or Madam

BT COMMUNICATIONS STREET HUB PROJECT
FULL PLANNING & CONSENT TO DISPLAY ADVERTISEMENTS APPLICATIONS
GRW009 – PAVEMENT O/S Premier Inn London Woolwich (Royal Arsenal Hotel) / Beefeater, Beresford Street, London, SE18 6BF

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

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

BT Street Hub Project

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

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

Overall, BT Street Hubs will help future proof the high street making them smarter, safer, and more sustainable, while also providing a valuable contribution to the Government's aim to improve wireless communications across the UK. Investment in the high street is at an all-time low, but that has not slowed BT down as they look to ramp up their rollout of new BT Street Hubs across the UK. They are continuing their commitment to invest and improve in the high street, with one BT Street Hub at a time, and with that decluttering these environments with the associated removal of existing BT phone boxes.

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

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

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

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

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

Yours faithfully

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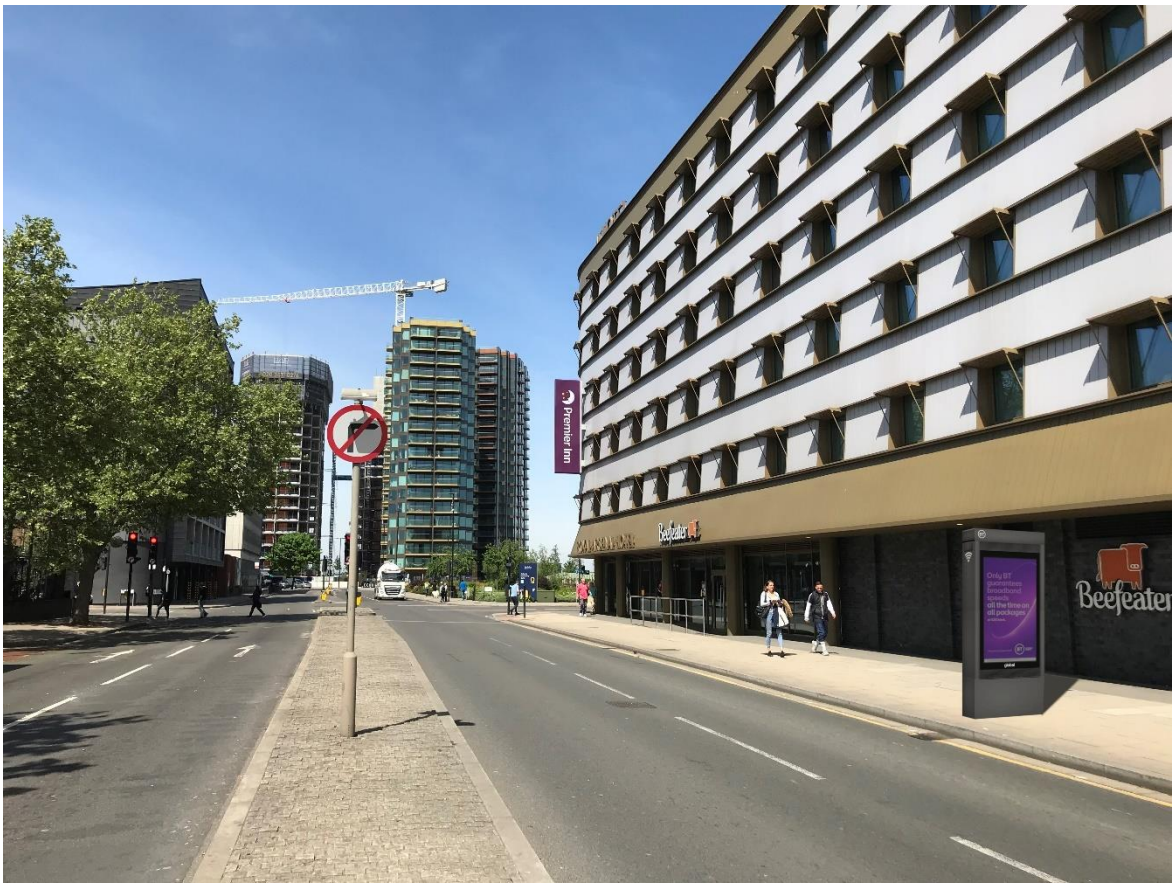
Planning, Design and Access Statement

Our Ref.	GRW009
Lat/Long	51.492670 /0.06738
Project Type	BT Street Hub
Conservation Area	The application site is not within a Conservation Area
Statutory Listed Buildings in vicinity	None

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

Proposed Install

PAVEMENT O/S Premier Inn London Woolwich (Royal Arsenal Hotel) / Beefeater, Beresford Street, London, SE18 6BF



Proposed Removal 1 Tel 02088542379 Pavement o/s Corner of Beresford Street & Macbean Street	Proposed Removal 2 Tel 02083166348 Pavement o/s O/S Plumstead High St
	

Planning Legislation

This application is for full planning permission under section 62 of the Town and Country Planning Act 1990 [the 1990 Act] and express advertisement consent under regulation 9 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 [the Regulations]. Applications for full planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise (Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the 1990 Act). Under the advertisement Regulations, Express Consent is required for the advertisement element, notably the 2no. digital screens on each side of the BT Street Hub. As per regulation 3 of the Regulations, applications for Express Advertisement Consent must be determined in the interests of amenity and public safety, considering (a) the provisions of the development plan, so far as they are material, and (b) any other relevant factors.

UK Digital Strategy

Digital connectivity is now considered to be a utility, and modern life is increasingly impossible without it. Connectivity drives productivity and innovation and is the physical underpinning of a digital nation. Being connected is fundamental to the success in our modern forward-thinking streets and the proposed BT Street Hub provides a cost-free way for communities to get online and take advantage of available opportunities. The Government has committed that every individual and every business should have the skills and confidence to seize the opportunities of digital technology and have easy access to high-quality internet wherever they live, work, travel or learn. An update to the UK's Digital Strategy has unfortunately been postponed due to the Covid-19 pandemic but is now due to be published in 2022 and drafts indicate a continued promotion of the government's policy of improved digital connectivity.

UK Government Policy on Mobile Infrastructure Deployment

The UK Government has identified the need for greater investment in mobile infrastructure to increase the widespread availability and capacity of mobile voice and data networks. In 2016, the DCMS produced the following statement in response to this need and stated: *The Government acknowledges that there has been a profound shift over the last decade in the way citizens approach and access digital communications. What was once seen as a luxury is now a basic need, and people expect to have access to fast broadband at home, irrespective of where they live, and use their mobile devices anywhere they go.'* The proposed BT Street Hub subject to this application provides valuable communications infrastructure to help meet the increasing demands for high quality mobile connectivity.

UK Government Sustainable Development Goals

The 2030 Agenda for Sustainable Development is a historic global agreement to eradicate extreme poverty, fight inequality and injustice and leave no one behind. Agreed by world leaders at the UN in 2015, the 17 Sustainable Development Goals (SDGs) are fully embedded in the activity of each government department. One of the Government's primary focuses to achieving Sustainable Development Goal 8 (*Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all*) and Sustainable Development Goal 9 *('Build resilient*

infrastructure, promote inclusive and sustainable industrialisation and foster innovation) is to increase economic growth and productivity through improved digital connectivity. The proposed BT Street Hub subject of this application will provide a valuable addition to these Sustainable Development Goals.

National Planning Policy Framework, 2021

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

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

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

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

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

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

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

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

Paragraph 118 - Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.

The NPPF states the following specifically in relation to advertisement control in section 12:

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

Chapter 16 of the NPPF– Conserving and enhancing the historic environment also pertains to the heritage assets and conservation areas for which consideration is required for some sites,

Code of Practice for Wireless Network Development in England

The Code of Best Practice has been fully revised, and the latest version was published by DCMS in March 2022. It acknowledges that the planning system plays a key role in delivering the digital

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

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

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

The London Plan, 2021

The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. The following policy relative to digital connectivity infrastructure is considered relevant:

Policy SI6 Digital connectivity infrastructure
A To ensure London's global competitiveness now and in the future, development proposals should:
1) ensure that sufficient ducting space for full fibre connectivity infrastructure is provided to all end users within new developments, unless an affordable alternative 1GB/s-capable connection is made available to all end users
2) meet expected demand for mobile connectivity generated by the development
3) take appropriate measures to avoid reducing mobile connectivity in surrounding areas; where that is not possible, any potential reduction would require mitigation
4) support the effective use of rooftops and the public realm (such as street furniture and bins) to accommodate well-designed and suitably located mobile digital infrastructure.

The following policies have been taken into account when formulating this latest Street Hub proposal:

SD6 - Town centres and high streets
D5 - Inclusive design
D8 - Public realm
D11 - Safety, security and resilience to emergency
S1 - Developing London's social infrastructure
E10 - Visitor infrastructure
HC6 - Supporting the night-time economy
SI 1 - Improving air quality
SI 6 - Digital connectivity infrastructure
Policy D3 – Optimising site capacity through the design-led approach
Policy HC1 – Heritage conservation and growth
Policy T2 – Healthy Streets
Policy T4 – Assessing and mitigating transport impacts

Mayor of London Transport Strategy, 2018

Policy 23 (under Principles for new transport services and technology)
The Mayor, through TfL, will explore, influence and manage new transport services in London so that they support the Healthy Streets Approach, guided by the following principles:

e) Creating a safe, attractive environment on our streets: new services and technology should help create a safer, quieter and more pleasant environment on London's streets, where it is more attractive to walk or cycle, and should not lead to existing active trips being made by nonactive modes. There must always be an emphasis on the safety of passengers, people walking and cycling, and other road users. Where this involves introducing technology directly into the street, it should be done in a co-ordinated way that enhances the overall character of the street, reduces clutter, and does not prevent future potential re-allocation of space for walking, cycling and public transport.

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

The Royal Greenwich Local Plan: Core Strategy July 2014

2.1.4 In 2028, Royal Greenwich's town centres will be vibrant places of culture, retailing, employment, living and business that are accessible to residents and assist in establishing a strong community identity. In particular Woolwich will be established in its role as a Metropolitan Centre within South East London and the Thames Gateway. Eltham will have retained its role as the preeminent centre in the south of Royal Greenwich. West Greenwich and the Maritime Greenwich World Heritage Site will remain key centres for tourism, attracting millions of visitors and as a centre for tertiary education.

2.1.5 Those areas of Royal Greenwich that will not experience significant physical development change will have benefited from enhancements and improvements to the quality of the environment where it is currently poor.

Royal Borough of Greenwich, Local Planning Policy

The adopted Royal Borough of Greenwich Local Plan consists of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies, the adopted Policies Map and Site Allocations. The relevant policies are set out below:
Policy DH1 - Design
DH3 - Heritage
Policy DH(c) - Telecommunications Development
Policy DH(f) - Advertisements
Policy DH(g) - Local Views
Policy DH(h) - Conservation Areas
Policy DH(i) - Statutory Listed Buildings
Policy IM(b) - Walking and Cycling

2.3 Strategic Objectives

2.3.1 The following objectives set out how the spatial vision for Royal Greenwich will be delivered.
J. To ensure that the necessary physical, social… infrastructure is provided, or existing infrastructure is enhanced to support the planned growth and development in Royal Greenwich throughout the plan period.

Things we cannot change

3.1.2 In developing a strategy, it is necessary to work within the parameters of the London Plan and national planning policy, including the Government's National Planning Policy Framework (NPPF). Within national planning policy, this includes:

- Locating major shopping developments, and other uses that attract a lot of people, in town centres;
- Supporting the expansion of electronic communications networks…
- …Protecting and enhancing historic assets; and
- Protecting World Heritage Sites.

3.2.1 The Royal Borough's spatial strategy provides for the growth and enhancement of Royal Greenwich, to support new and sustain existing communities… enhancing the town centres, open spaces, and Royal Greenwich's heritage assets.

Key features of the spatial strategy

- Enhancement of existing neighbourhoods in Royal Greenwich;
- Transformation of Woolwich into a vibrant, successful town centre with new retail, office, hotel, cultural and housing development, that will claw back trade and warrant reclassification of the Town as a Metropolitan Centre towards the end of the plan period;
- Protection and enhancement of Royal Greenwich's heritage assets, and encouraging the positive use of these assets as a catalyst for conservation-led regeneration;
- Development will reflect the needs of a growing and increasingly mixed population, taking advantage of enhanced digital technologies to improve social interactions and sense of community.

Town Centres

4.3.3 Royal Greenwich's town centres are under constant competition from town centres within neighbouring boroughs and elsewhere such as Bexleyheath, Bluewater and Stratford City. Planned improvements within these centres will place further pressure on our own town centres. The enhancement of our centres is therefore vital to resist and reduce loss of market share to neighbouring boroughs and to attract businesses and shoppers from outside of Royal Greenwich.

4.3.15 Improvements to the public spaces in Woolwich will create a quality environment that will enhance the retail offer and create a place where people want to live, work and visit, this will help to draw people back to shopping and spending their leisure time in Woolwich.

Design and Heritage

3.2.13 The quality and diversity of the places and spaces of Royal Greenwich are an essential feature of the overall quality of life and the environment. It is therefore critical that the physical growth and development within Royal Greenwich… achieves a high quality of design that contributes to a high quality, safe environment, a sense of place and creates distinctiveness and which offers a high quality of life for occupants.

3.2.14 Royal Greenwich's unique heritage will be protected and enhanced... Heritage assets including the conservation areas…and nearly 1,000 listed buildings will be protected as well as other locally significant assets, creating an important link to the rich history of Royal Greenwich.

3.2.22 … Access within the built environment will be improved through high quality design of new infrastructure… and public facilities.

Infrastructure

3.2.25 Connectivity to technology such as the Internet can be considered a utility of public interest in a similar way to other utilities such as water, gas and electricity.

3.5.16 To support the level of growth that Royal Greenwich will experience over the period covered by the Core Strategy, infrastructure will need to be in place.

4.2.10 The London Plan 2011 states that redevelopment of surplus industrial land should address strategic and local objectives, particularly for housing and for social infrastructure such as education, emergency services and community activities.

Policy DH(c) Telecommunications Development

Planning applications for telecommunications development will only be considered
where:
i. regard has been given a location a site which causes minimal visual impact subject to operational needs;

ii. any proposal is sited, designed, coloured and landscaped so as to minimise visual impact on its setting and local environment;
iii. the special character and appearance of … Greenwich's listed buildings, conservation areas and historic landscapes are preserved or enhanced…
vi. any proposal meets International Commission on Non-Ionizing Radiation Protection (ICNIRP) guidelines for public exposure.

4.4.43 Modern telecommunications are an essential and beneficial element in the life of Royal Greenwich's residents and workforce. Telecommunications have the potential to contribute to sustainable development by enabling more people to work and carry out other functions from home, thus reducing the need to travel, traffic levels and pollution. However, the Royal Borough, and the Government, are concerned about the impact of telecommunications on the environment and the Royal Borough will seek to ensure that the townscape will not suffer an unnecessary proliferation of telecommunications structures and thus, a lowering of environmental quality.

4.4.46 The benefits that telecommunications developments can bring are recognised and this policy seeks to allow such developments subject to criteria that aim to minimise the visual and environmental impact and to encourage the shared use of facilities.

Policy DH(f) Advertisements

The Royal Borough will normally give express consent for large posters or other advertisement displays provided they:
i. Do not adversely affect the amenity of residential areas, open spaces, conservation areas or areas of special character and are not in a position where they would have an adverse effect on the setting of a listed building or the Maritime Greenwich World Heritage Site and its Outstanding Universal Values;
ii. Harmonise with the scale and character of the surrounding area and are not fixed
to flank walls where they would be unduly dominant; and
iii. Do not adversely affect public safety including pedestrians and drivers.

Support

4.4.52 Advertisement displays are sometimes very appealing but can often be unsightly, detract from the character of an environment and have an adverse effect on the amenity of the area, particularly the sensitive locations identified in the policy. Their size can often look out of place with their surroundings, and they are sometimes located where they are likely to create a road safety hazard.

4.4.53 Further information is available in 'Outdoor advertisers and signs: a guide for
advertisers', which is a booklet published by Communities and Local Government in June 2007. It aims to explain how the system of advertisement control works in England.

Public safety and highways

The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (as amended) at Part 1 Regulation 3(2) outlines that factors relevant to public safety include:
…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.

With regard to pedestrians, It is noted the Transport White Paper - Creating Growth, Cutting Carbon (January 2011), sets out the Government's objectives for a greener and safer transport network that encourages economic growth and improves quality of life for communities. The White Paper encourages the implementation of sustainable local transport systems in achieving the Government's objectives of walking and use of public transport are key. "The Government wants to encourage and enable more sustainable transport choices. In transport terms, this might be exemplified by reducing unnecessary signs, posts and other street clutter to improve road safety and encourage walking". This would also include the introduction of new items.

Policy IM4: Sustainable Travel indicates cycling, and walking are supported within Royal Greenwich. The needs of pedestrians, including those with disabilities, and cyclists should be prioritised. All

existing footpaths and cycleways will be safeguarded, and the development of new and improved footpaths and cycleways will be supported.

Relevant applicable policies listed in the Pre-Application response, some of which have been noted above, and are consequently addressed/ adhered to where appropriate within this application.

Pre-Application Consultation

A pre-application consultation email was sent to the LPA on the 28/07/2021 which introduced the project and 9 potential BT Street Hub sites found around the authority. In a written response dated April 2022 from a representative of the Council's Planning and Highways department, it was advised;

'This location is outside of a town centre location on a stretch of pavement devoid of any similar advertisements or street paraphernalia, as such, a street hub with advertisements of the scale proposed would be highly conspicuous within this location to the detriment of the visual amenity of the area. The kiosks to be removed are located on the opposite side of a wide road, some 20m from the location of the proposed street hub. Furthermore, the positioning of the kiosk is not overly prominent within the street scene, as such it cannot be argued that their removal would reduce street clutter in the immediate vicinity. The bus stop with the advertisement is noted however this is on the opposite side of a large road and cannot be used to justify the addition of two larger LCD adverts. Overall, the location of this street hub would be particularly stark and apparent within the street scene.
A street hub in this location is unacceptable in design terms'.

Where practicable, all such matters raised have been taken on board when finalising this case and have been addressed within this submission.

Planning History

It is noted that in the vicinity of the application site there is advertisement presence, in which there are many transferable points that can be had with this BT Street Hub proposal. As detailed below, previous applications for likened forms of development were deemed acceptable and in keeping with the street scene.

The existing sacrificial kiosk opposite the proposed site on the Corner of Beresford Street & Macbean Street features advertisement. Additionally, three such applications, both Full Planning and Advertisement have been approved within the locality thus far, (LPA Refs: 21/0932/A, 21/0931/F, 21/3007/A, 21/3006/F, 21/3025/A and 21/3024/F) exhibiting that the merits of the St Hub unit are appreciated within the context of Royal Greenwich, as well as enabling a network of such units to be established within the Greenwich area.

New site

In this instance, the proposed BT Street Hub does not sit upon the exact footprint of an existing BT kiosk. This is because in replacing the existing BT phone booths, it was felt to be an inappropriate location for a new BT Street Hub so we have used this as an opportunity declutter and in turn sought to identify a more ideal position elsewhere. One of the existing kiosks is on the opposite side of the road on the corner of the main road at traffic lights. This kiosk is not suitable for a conversion or kerbside proposal. The proposed Street Hub would, therefore, be relocated onto the opposite side of the road which has a wide stretch of pavement.

It is deemed that rather than disrupt the visual amenity of the area, installation of a St Hub in this location would upgrade the space visually, be in keeping with the modern surroundings, and provide services to not only passing pedestrians, but also serve guests of the hotel, restaurant, and nearby establishments, whom, consideration of the current land use, are likely to be tourists who may specifically benefit from the amenity.

What is more, the existing sacrificial kiosks presented for removal are dated, not only would removal enhance the setting, reduce street clutter widen pavements to improve pedestrian flow, but would also reduce the likelihood of undesired hostile or anti-social behaviour at these locations which may pose as blind spots. The proposed Street Hub would be within plain view and unobstructed, emit light and draw attention so as to deter unwanted activity in the vicinity. For further information see appended Antisocial Behaviour Management Plan.

Siting Justification against Planning Policy

At the conception stage, we have tried to focus on pursuing direct conversions of existing kiosks wherever practicable when considering the existing street scene layout and furniture. We have looked for locations with wide pavements, and where a site's relationship with existing street furniture avoids an overwhelming proliferation of street clutter. It should be recognised that BT's legacy estate of payphones has grown up organically over the years and the location of existing BT kiosks can sometimes sit in street scene environments that have changed completely since they were first established on-site. In some instances, the BT Street Hub project has been seen as an opportunity to improve the pedestrian environment by removing awkward BT kiosks and repositioning the new unit to a more in keeping spot in the street scene.

It is appreciated that streets are ever-evolving environments, amidst society's changing connectivity demands. BT has a license and universal service obligation with Ofcom to provide a street level phone service, so the selection process of associated kiosks to be removed has had to take this into account. The new unit provides for free telephone calls, has quick links to charity lines and an emergency 999 button, however, there is a recognition that the use of phone boxes has dramatically changed since kiosks were first conceived, whilst now the need for Wi-Fi and mobile coverage has increased massively. In this respect we have tried to build a sequence of BT Street Hub sites wherever possible, so that this can improve connectivity and the user experience as they travel through an area.

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

The introduction of any form of development within a particular environment will always be, to some degree, a noticeable addition or change to those residents, businesses and regular passers-by found closest. However, it should be appreciated that the visibility of something that is new or the change in form that has an established presence on-site, like a telephone kiosk to a BT Street Hub unit with digital advertisements, does not automatically result in an overwhelming adverse harm occurring. The starting point and fundamental principle applied by the applicant is always to replace existing BT phone boxes with BT Street Hub units where they will be in-keeping with their existing surroundings. In this regard it is seen as an opportunity to create an up-to-date network of sites and so help futureproof the high street making them smarter, safer, and more sustainable.

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

Justification for the siting and appearance of the proposed BT Street Hub unit itself, has been assessed against up to date national and local planning policies and any other material considerations. Our assessment has concentrated on whether the removal of the existing BT call boxes when balanced against the replacement of new BT Street Hub with all its added features at the application site, creates a significant visual harm that would outweigh the public benefits.

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

Siting

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

Beresford Street is a busy highway for b vehicular and pedestrian traffic. The street scene context immediate to the proposed BT Street Hub site is generally residential/commercial and comprises of hotels, apartments, shops, and restaurants. In the immediate vicinity of the proposed BT Street Hub site there is existing street furniture including bus shelters containing advertisement, road signage, streetlights, and bollards. Viewed within this street scene context, it is considered that the siting of the proposed BT Street Hub is appropriate.

Albeit the associated kiosks are not on the site of the proposed BT Street Hub, its removal will be a material benefit to that area as it will remove street clutter and allow for improved pedestrian movements.

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

Appearance

The proposed BT Street Hub 2.0 unit is an advanced, modern development which has been designed following significant improvements in technology and digital content over recent years from when BTs first generation unit, InLink was rolled out. It can promote the image of the authority as a vibrant place, in which we believe it will improve the quality of the immediate streetscape for residents, businesses and visitors.

The proposed design is slimmer and takes a more compact profile than the existing BT payphone boxes that the proposed BT Street Hub is replacing. The user interface is located at a low level and is a similar height to an existing BT payphone unit to ensure that it is accessible to all users.

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

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

It is concluded that the dimensions and design of the proposed BT Street Hub are justified, and its appearance is an improvement when compared to the BT call boxes that are to be removed. Furthermore, the added features and communications facilities within the new unit are in full accordance with the Government's digital policies and strategy which seek to promote improved connectivity. When balanced against such matters, it is considered that the appearance of the proposed BT Street Hub itself is acceptable and is in accordance with national and local planning policies.

Pavement Width

The total existing pavement width at this location is 6000mm. The total width of the BT Street Hub is 1236mm (tapering down to a footprint width of 1201mm on the pavement). With the BT Street Hub being located 600mm off the kerb, the remaining available footway allows for safe circulation space around the unit and will not restrict passing pedestrian movement. It is of note that the structure is only 350mm wide, so any minor narrowing of the footway occurs for just a few centimetres. This wide expanse of space is another reason for the St Hub to be a relocation, rather than direct replacement of the existing kiosk on Beresford Street.

Advertisements

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

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

It is recognised that all advertisements are intended to attract people's attention, however in this case their siting and size would not create an untoward feature within the street scene. The position where the BT Street Hub is to be located and the orientation of the advertisement screens in relation to the road would not cause unacceptable interference with nearby road signs and or navigational lights. Viewed within the street scene setting, the digital advertisements would be seen by passing pedestrians and motorists but would not create confusion nor influence the behaviour of drivers to such a degree that they would cause a hazard by reason of their presence. The proposed BT Street Hub would be sited away from road junctions so it would not unduly interrupt any visibility splays or sightlines. When viewed within the street scene context of the wider environment, it is considered that the BT Street Hub would not appear as an inappropriate feature to motorists.

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

Approved St Hubs as InLinks in the area include Ref:18/1981/T3 telephone kiosk outside of 133 Woolwich Road, Greenwich, se10 in 2018. Additionally, as aforementioned, the council have approved several of these street hubs within the borough including at Woolwich Road (21/0931/F and 21/0932/A), outside Greenwich College (21/3006/F and 21/3007/A), outside meridian house and next to a listed building (21/3024/F and 21/3025/A) and on Powis Street (21/3022/F and 21/3023/A) which is within the Woolwich Conservation Area, therefore it is deemed that a precedent has been set. The area features modern frontage and therefore the structure would not seem incongruous nor stark.

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

- There would be no conflict with any traffic signs, signals, crossing points, schools, hospitals or low bridges.
- No sightlines or clearances would be affected.
- The TfL guidance states that 'Static digital advertising is likely to be acceptable in locations where static advertising exists or would be accepted.' There are existing traditional advertisement on similar sections of the respective roads in many cases.
- The geometry of the roads are not complicated and the driving conditions are not considered to be demanding or complicated.

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

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

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

Planning Conditions

To give assurance that each Street Hub will operate as intended and the associated payphone removals will occur, we would be pleased to accept the following conditions or a mutually agreed version of them to be included as part of any planning consent:

A. Within three (3) months of development commencing the existing BT payphones shown above shall be removed in their entirety and the land made good to the same condition as the adjacent land.
B. Pavement surrounding the Street Hub shall be made good to the same condition as the adjacent land.
C. The intensity of the illumination of the two digital display screens shall not exceed 600 candelas per square metre (cd/m2) between dusk and dawn in line with the maximum permitted recommended luminance as set out by 'The Institute of Lighting Professional's 'Professional Lighting Guide 05: The Brightness of Illuminated Advertisements'.
D. The digital display screens shall not display any moving, or apparently moving, images (including animation, flashing, scrolling three dimensional, intermittent or video elements).
E. The minimum display time for each piece of content on the digital display screens shall be 10 seconds.
F. The interval between each piece of content on the digital display screens shall take place over a period no greater than one second; the complete screen shall change with no visual effects (including swiping or other animated transition methods) between displays and the display will include a mechanism to freeze the image in the event of a malfunction.
G. No content on the digital display screens shall resemble traffic signs, as defined in section 64 of the Road Traffic Regulation Act 1984.

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

Conclusion

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

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