

Head of Planning  
Basingstoke and Deane Borough Council  
Civic Offices  
London Road  
Basingstoke  
RG21 4AH

27/05/2022

Dear Sir/ Madam

**BT COMMUNICATIONS STREET HUB PROJECT  
FULL PLANNING & CONSENT TO DISPLAY ADVERTISEMENTS APPLICATIONS  
BASD002 – PAVEMENT O/S 25, 27A WINCHESTER STREET, BASINGSTOKE, RG21 7EE**

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 Basingstoke and Deane Borough 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

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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
- Heritage 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 Professionals' '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 box 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



**Sam Platt** | Solutions 30 UK Limited



BASD002

**Planning, Design and Access Statement**

Our Ref.	BASD002
Lat/Long	51.2623511899072, -1.08835021913569
Project Type	BT Street Hub
Conservation Area	Basingstoke Town 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 Installation at  
**Pavement o/s 25, 27A Winchester Street, Basingstoke, RG21 7EE**



<p><b>Proposed Removal 1</b> Tel 01256357149 (below, left) Pavement o/s Post Office, London Street, Basingstoke, RG21 7NT</p>	<p><b>Proposed Removal 2</b> Tel. 01256329261 (below, right) Pavement o/s Post Office, London Street, Basingstoke, RG21 7NT</p>
	

### **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 Infrastructure Strategy**

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

### **National Planning Policy Framework, 2021**

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

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

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

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

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

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

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

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

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

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

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

### **Code of Practice for Wireless Network Development in England**

The Code of Best Practice has been fully revised, and the latest version was published by DCMS in March 2022. It acknowledges that the planning system plays a key role in delivering the digital infrastructure that we need, in a sustainable and well-designed way, especially as households and businesses become increasingly reliant on mobile connectivity. The principal aim of the Code is to ensure that the Government's objective of supporting high quality communications infrastructure, which is vital to continued economic prosperity and social inclusion for all, is met. The Code confirms that the development of Wireless Network infrastructure must be achieved in a timely and efficient manner, in a way that balances connectivity requirements with the economic, community and social benefits that this brings with the environmental considerations associated with such development. BT Street Hub has a key role to play in delivering the necessary infrastructure to support the increasing reliance on mobile connectivity at a street level and so accords with the Code of Best Practice.

### **Town 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.

### **Basingstoke and Deane Local Plan 2011 – 2029**

When taking into account the proposed development and those referenced in the LPA pre-application enquiry response, it is considered that the following Local Plan policies are applicable and in accordance with this case. Subject to their relevance, these policies are highlighted in full or in part as follows : -

#### **Policy SD1 – Presumption in favour of sustainable development**

When considering development proposals the council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.

#### **Policy CN6 – Infrastructure**

New development will be required to provide and contribute towards the provision of additional services, facilities and infrastructure at a rate, scale and pace to meet the needs and requirements that are expected to arise from that development.

Therefore, development proposals will be permitted where it can be clearly demonstrated that infrastructure can be provided and phased to support the requirements of proposed development.

Infrastructure provision or improvements should be provided on-site as an integral part of a development. Site specific mitigation measures will be secured by planning obligations.

New infrastructure should be provided prior to occupation of the development, or in larger schemes, prior to the occupation of the phase of the development for which it is needed. This will be secured by appropriate planning conditions, s.106 planning obligations including bonds and the council's procedures with respect to the use of CIL revenue.

### **Policy EM10 – Delivering High Quality Development**

All development proposals will be of high quality, based upon a robust design-led approach.

1. Development proposals (excluding household extensions<sup>28</sup>) will be permitted where they:
  - a. Contribute to the provision of neighbourhoods and places for work and leisure that are well connected, accessible, safe, easy for people to find their way around and, function well in practical terms;
  - b. Are accessible to all and promote buildings that are durable, adaptable and able to respond to changing social, environmental, technological and economic conditions;
  - c. Positively contribute to the appearance and use of streets and other public spaces;
  - d. Promote the efficient use of land and achieve appropriate housing densities which respond to the local context, as informed by community documents, and which take into account the urban, suburban or rural location of the site;
2. All development proposals will be required to respect the local environment and amenities of neighbouring properties in accordance with the principles set out below. Development proposals will be permitted where they:
  - a. Positively contribute to local distinctiveness, the sense of place and the existing street scene, taking into account all relevant SPDs and community documents that identify the local character and distinctiveness of an area which is valued by local communities, whilst allowing for innovation where appropriate;
  - b. Provide a high quality of amenity for occupants of developments and neighbouring properties, having regard to such issues as overlooking, access to natural light, outlook and amenity space, in accordance with the Design and Sustainability SPD;
  - c. Have due regard to the density, scale, layout, appearance, architectural detailing, materials and history of the surrounding area, and the relationship to neighbouring buildings, landscape features and heritage assets;

### **Policy EM11 – The Historic Environment**

All development must conserve or enhance the quality of the borough's heritage assets in a manner appropriate to their significance.

Development proposals which would affect designated or non-designated heritage assets will be permitted where they:

- a) Demonstrate a thorough understanding of the significance of the heritage asset and its setting, how this has informed the proposed development, and how the proposal would impact on the asset's significance. This will be proportionate to the importance of the heritage asset and the potential impact of the proposal;

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- b) Ensure that extensions and/or alterations respect the historic form, setting, fabric and any other aspects that contribute to the significance of the host building;
- c) Demonstrate a thorough understanding of the significance, character and setting of conservation areas and how this has informed proposals, to achieve high quality new design which is respectful of historic interest and local character;
- d) Conserve or enhance the quality, distinctiveness and character of heritage assets by ensuring the use of appropriate materials, design and detailing; and
- e) Retain the significance and character of historic buildings when considering alternative uses and make sensitive use of redundant historic assets.

### **Policy EP3 – Town, District and Local Centres**

Main town centre uses (such as retail, office, entertainment and leisure) will be permitted within the defined town, district and local centres provided that they are designed at a scale and character which reflects the role, function and distinctive qualities of the centre. Any development that would harm the vitality and viability of a defined centre will not be permitted.

### **Pre-Application Consultation**

A pre-application consultation email was sent to the LPA on the 08/12/2021 which introduced the project and 5 potential BT Street Hub sites found around the authority.

A written response to the potential BT Street Hub sites was received on the 05/04/2022 (Reference: 21/03756/EN10), in which the council made some general observations about this option, it was said:

*“Policy EM10 states that proposals will be required to respect the local environment, contribute to the street scene, be visually attractive and provide adequate vehicular parking and cycle storage. Policy EM10 also requires developments to provide high levels of amenity for proposed occupants and neighbouring occupiers regarding privacy, amenity space and natural light.*

*In areas where the BT Hub is proposed to be installed from the removal of the old telephone boxes, this is considered acceptable and would not be considered more materially harmful than the phone boxes in situ. However, the illumination of adverts is not considered to be acceptable within the conservation area at all times of the day. A condition limiting the times at which the illuminated advertisements are shown might be considered on any permission.*

*Site 2 would not be not located close to the existing telephone box that is to be removed, these two telephone boxes close together are cluttered and spacing the BT Hubs further apart would create a less cluttered town centre.*

*Sites 1, 2 and 3 have heritage implications, being either located in the Basingstoke Town CA or in close proximity to listed buildings”*

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.

LPA Ref – 21/02138/ADV – 1 no. fascia sign with troughlight over and 1 no. projecting sign  
Site Address – 22 – 24 Winchester Street, Basingstoke, Hampshire  
Decision – Granted 24/09/2021



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LPA Ref – 21/00895/ADV – Display of 1 no. Externally illuminated aluminium fascia sign and 1 no. externally illuminated projecting sign  
Site Address – 25-27 Winchester Street, Basingstoke, RG21 7EE  
Decision – Granted 14/05/2021

LPA Ref – 15/00381/ADV – Display of 2 no. externally illuminated fascia signs and 1 no. externally illuminated projecting sign  
Site Address – 20 Winchester Street, Basingstoke, Hampshire  
Decision - Granted 12/05/2015

### **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 on London Street, it was felt to be an inappropriate location for a new BT Street Hub so we have used this as an opportunity declutter and in turn sought to identify a more suitable position elsewhere.

### **Siting Justification against Planning Policy**

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

It is appreciated that streets are ever-evolving environments, amidst society's changing connectivity demands. BT has a license and universal service obligation with Ofcom to provide a street level phone service, so the selection process of associated kiosks to be removed has had to take this into account. The new unit provides for free telephone calls, has quick links to charity lines and an emergency 999 button, however, there is a recognition that the use of phone boxes has dramatically changed since kiosks were first conceived, whilst now the need for Wi-Fi and mobile coverage has increased massively. In this respect we have tried to build a sequence of BT Street Hub sites wherever possible, so that this can improve connectivity and the user experience as they travel through an area. Through installing this Street Hub solution, BT are supporting the local community of Basingstoke and abiding to policy CN6 – Infrastructure. It is clearly noted in the local plan that Basingstoke suffers from weakened broadband connection in certain areas. Thereby, this makes the installation of BT Street Hub invaluable due to the increased coverage constituents will receive. This also correlates with policy CN6 as it is providing provision for communication infrastructure, providing people with more opportunity to communicate through the superfast Wi-Fi provided and access to free phone calls through the BT Street Hub.

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. Through this addition, the applicant is abiding by policy EM10 – Delivering High Quality Development. This is further agreed by the case officer who noted in the pre-application response that it successfully respects the local environment. The subject of illumination was raised in the pre-application response where the case

officer noted controlled illumination would not be harmful for the community and residential amenities. This is supported by the planning officer for planning application 21/00895/ADV (approximately 5 metres away from the site) which brought about the Display of 1 no. externally illuminated fascia sign and 1 no. externally illuminated projecting sign. The officer noted that it was essential that policy EM10 was adhered to throughout. The applicant has adhered to these this policy as well for the BT Street Hub through utilising a powder coated external grade for the BT Street Hub to be in keeping with the conservation area. There is a significant amount of illuminated signs on Winchester Street which adds to the commercial setting and the BT Street Hub would only enhance this instead of damaging the conservation area. Even though the illumination of the Street Hub was recognised as an issue within the pre-application response, the applicant has acknowledged the illumination of the screens needs to be moderated which is in accordance with industry standards (ILP Professional Lighting Guide as attached) which defines the limits of illumination that we will follow. Also, the power of the illumination will be adjusted throughout the day and night to be in keeping with the pre-application response, which noted that controlled and modified illumination would not be detrimental to the location of nearby Conservation Area. Furthermore it is noted that such matters can be controlled by condition in which suggested wording again in accordance with ILP guidance is noted in this statement. The pre-application response went further to note that the benefits of the BT kiosk would most likely outweigh any problems caused for heritage assets.

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 the pre-application response, the potential issue of noise and assessments of such matters was raised. As attached, we have included a noise assessment plan to monitor the Street Hub's performance. It is of note that BT have created a sound cloud so it will not be too disruptive to the citizen using the phone feature. Also, the pre-application response agrees that the positives of the infrastructure provided would outweigh the negative siting of the Street Hub.

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.

Overall, it has been made clear in the pre-application response that the proposed site accords with the development plan. Also, the development plan provides services that are essential to Basingstoke and complies with its council policies including EM10 and CN9. Going further, it is clear that the benefits that the BT Street Hub offers outweighs any of the drawbacks. These benefits include (but is not limited to) free phone calls, direct 999 call button and ultrafast public and encrypted Wi-Fi Access to public services. Going further, the pre-application response clearly states that "the public would benefit from the BT Hubs in terms of infrastructure" which supports this idea.

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 2 no. BT existing call boxes in association with 1 no 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.

Winchester Road is a busy highway for pedestrian and vehicular traffic. The street scene context immediate to the proposed BT Street Hub site is generally commercial and comprises a number of shops and restaurants including The Meldiz Turkish Restaurant and the Casino "Admiral". In the immediate vicinity of the proposed BT Street Hub site there is existing street furniture including bollards, street lights and litter bins. Viewed within this street scene context, it is considered that the siting of the proposed BT Street Hub is appropriate.

The application site is located within the Basingstoke Town Conservation Area. Clearly there will always be challenges faced in finding a balance between limiting any visual harm created by the siting of development upon heritage assets when weighed up against the public benefits it will bring to the area. The Planning Officer for application 21/00895/ADV (located 5 metres away from the site) stressed that policy EM11 must be abided by and that policies must conserve or enhance the quality of conservation areas. The report also refers to the Conservation Area Management Plan which notes that a poor use of colours has meant that buildings have been compromised. The applicant has abided by the plan by ensuring the chosen materials were being in line with the policy set out in the Design and Sustainability SPD. The kiosk will be painted powder coated with a black aluminium casing. This is very important because the SPD clearly states that complementary materials include metals such as aluminium, will allow for a more "effective expression of form". This abides by design principle MD1 and adds to the amenity of the region. The applicant believes that this usage of materials will be in fitting with the local conservation area. This is also in keeping with the Heritage SPD's Principle SHA02 – Development within the setting of listed buildings: design. Where it states that "such proposals will need to respond sensitively to the design of the listed building". Going further, the case officer for application 21/02138/ADV (located approximately 15 metres away from the site) also highlighted the heavy commercial setting of Winchester Street so the addition of any illuminated advertising would be unimpactful to the conservation area. This is particularly important because London Street is host to a number of historic inns which reflects the historic economy of the town. By utilising these materials, the applicant is abiding by Principle CA01 – development in conservation areas: preserving or enhancing character and appearance and preserving significance in the heritage SPD.

When seen in perspective within the street scene, the proposed siting and orientation of the BT Street Hub, will not have a significant material impact on the setting or views of the Conservation Area. It is considered that any harm upon heritage assets would be outweighed by the removal of the existing call boxes and the public benefit features of the BT Street Hub proposal. The siting of the proposed BT Street Hub will not appear incongruous within this vibrant part of Basingstoke Town Conservation Area given the abundance of illuminated fascia signs and street furniture found along this stretch of road.

The proposed removal kiosks are outside of the post office on London Street in proximity to proposed Street Hub site BASD001. Removing these kiosks and placing the BT Street Hub in the highly pedestrianised location of Winchester Street will be beneficial as it will improve walkability and reduce street clutter on London Street. This goes further as it abides by the Design and Sustainability SPD's strategic principle of "encouraging walkability". This further abides with Policy CN9 as it allows for Basingstoke Town to be more walkable without the unnecessary street clutter. Also, the added benefit of proposing a new site instead of converting the former site is that it takes the kiosk outside of retail units.

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 BT's first generation unit, InLink was rolled out. It can promote the image of the authority as a vibrant place, in which we believe it will improve the quality of the immediate streetscape for residents, businesses and visitors.

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

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

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

The BT Street Hub is placed near the highway, in which Winchester Road is a road dominated by vehicular and pedestrian movements, however there is precedent for advertisement being presented in the vicinity where adverts have been deemed not distracting for oncoming motorists. The planning officer for Application 21/00895/ADV noted that as the location was highly commercialised and that moderated illumination would not cause a hazard for the highways. Going further, the highways department made no objection to the proposal as the signage was static so would not distract incoming drivers. The proposed street hub goes up to a maximum of 2500cd/m<sup>2</sup> in the daytime and is reduced to 600cd/m<sup>2</sup> at night and abides by the ILP Professional Lighting Guide 2015. The images are also static, so this would suggest that it clearly abides with the regulations in place. The planning officer also noted that advertisements are naturally supposed to catch people's attention, but the real question is whether it caused a hazard or not. Because the kiosk is not blocking any street signs and the images are static, it is not putting anyone's life in jeopardy.

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 5100mm. The total width of the BT Street Hub is 1236mm (tapering down to a footprint width of 1201mm on the pavement). The remaining available footway of 3400mm allows for safe circulation space around the unit and will not restrict passing pedestrians movements. It is of note that the structure is only 350mm wide so any minor narrowing of the footway occurs for just a few centimetres.

### **Advertisements**

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

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

It is recognised that all advertisements are intended to attract people's attention, however in this case their siting and size would not create an untoward feature within the street scene. The position where the BT Street Hub is to be located and the orientation of the advertisement screens in relation to the

road would not cause unacceptable interference with nearby road signs and or navigational lights. Viewed within the street scene setting, the digital advertisements would be seen by passing pedestrians 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.

There is precedent for digital advertising in the vicinity of the application site. The case officer for application 21/02138/ADV noted that Winchester Street has a highly commercial street scene and the fascia signs present intertwine well with the street scene and would not negatively impact the wider street scene at all. The case officer for application 21/00895/ADV supports this point by suggesting that the highly commercial setting will not negatively impact the conservation area. Also, due to its commercial setting, the public benefits the kiosk would bring would strongly outweigh any impacts on the heritage setting.

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 10m<sup>2</sup>) 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/m<sup>2</sup>) 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. This is supported by the pre-application response which states that it would encourage a submission be made for the BT Street Hub.

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.