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**Havant Borough Council,
Planning Development,
Public Service Plaza,
Civic Centre Road,
Havant, Hampshire,
PO9 2AX**

HAV-002 / 3-HAV002

22nd August 2025

Dear Planning,

BT Street Hub Project
Full Planning and Advertising Application
HAV-002 Pavement o/s 5 Queens Parade, London Road, Waterlooville, PO7 7EB (E 468292, N 109457)

We write on behalf of our client, BT, relating to various sites across your authority for the installation of BT Street Hubs and the associated removal of BT payphones. Taking onboard the comments received, BT are moving forward with this particular case and are applying to Havant Borough Council for full planning permission and advertisement consent for installation of 1no. BT Street Hub and removal of associated BT payphones.

InLink Project

The InLink UK service was first launched in 2017 and since then 494 InLink structures were rolled out in 23 cities. These 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, but the screens can also show local content free of charge. After the suppliers of the InLinks went into administration in 2019 and are no longer able to supply units to BT, this product is no longer available. Since then, BT have been working on a new and improved unit, the BT Street Hub, that they are keen to rollout in Waterlooville and all major UK cities.

BT Street Hub Project

BT is continuing to move forward with public connectivity and benefits in which Street Hubs will provide a sleek and modern answer to the demands of a digitally connected society. BT Street Hubs include the ability to house 5G small cells which 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 and NPPF 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. Street Hubs take this into account and can house sensors that count pedestrian, cyclist and vehicle movements as well as monitor air, sound and light. This free information 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 will be a useful source of real-time data in the delivery of the Council's own green agenda, travel plans and can be used to present a business case for carbon offset credit.

Overall, Street Hubs will help future-proof the high street making them smarter, safer, and more sustainable. 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 Street Hubs across the UK. They are continuing their commitment to invest and improve in the high street, with one Street Hub at a time, and with that decluttering these environments with the associated removal of existing BT phone boxes.

This submission comprises of the following documents:

- Site specific Planning and Design & Access statement;
- IApp forms and certificates generated by the Planning Portal;
- The prescribed fee of £1,156 (plus VAT) paid directly to the Council via the Planning Portal;
- Drawings including location plan map, proposed site plan, existing and proposed elevations;
- 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' 2023 for your reference;
- 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 try and encompass the removals as well.

The application site and proposal is within adopted highways-controlled land, maintained at public expense. As BT are a statutory undertaker on such land, a developer's notice has been served on the Highways Authority and any others who have been identified from Land Registry records as being an owner of the land.

We trust the applications can be registered at your earliest opportunity, in which should you require any further information or have any queries please do not hesitate to email me.

Yours sincerely,

Alan Osborne

Alan Osborne MRTPI
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Contents

Planning, Design and Access Statement	4
UK Digital Strategy.....	5
National Infrastructure Strategy	5
Town and Country Planning (Control of Advertisements) (England) Regulations 2007	6
National Policy Planning Framework	6
Code of Practice for Wireless Network Development in England (March 2022).....	8
Supplementary Planning Guidance- 'Advertisements, Sponsorship and City Dressing' (2013)	8
Local Planning Policy.....	10
Local Plan (Core Strategy) 2011.....	10
Local Plan (Allocations) 2014.....	12
Planning History	14
Siting Justification against Planning Policy	15
Siting	16
Appearance	16
Pavement Width	17
Advertisements	17
Noise Management.....	18
Heritage Statement	19
Conclusion	20
Planning Conditions	21

Planning, Design and Access Statement

Our Ref.'s	HAV-002
Address	Pavement o/s 5 Queens Parade, London Road, Waterloooville, PO7 7EB
Lat/ Long	50.880584, -1.030634
Site Type	Direct conversion

As part of our collaborative approach to connecting and improving local streets, Full Planning Permission and Consent to Display an Advertisement is sought for the installation of **Ino. BT Street Hub and removal of associated BT payphones.**

Photomontage of Proposed Installation



Proposed Kiosk Removal(s)

Tel: TBC

Address: Available upon request

Tel: TBC

Address: Available upon request

UK Digital Strategy

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

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 Hub can contribute to this with its suite of features, including Wi-Fi and small 5G cells capabilities, air monitoring and much more.

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

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 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.

The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 state the following specifically in relation to advertisement control:

PART I - General

Powers to be exercised in the interests of amenity and public safety

3. (1) A local planning authority shall exercise its powers under these Regulations in the interests of amenity and public safety, taking into account;
 - (a) the provisions of the development plan, so far as they are material; and
 - (b) any other relevant factors.
- (2) Without prejudice to the generality of paragraph (1)(b);
 - (a) factors relevant to amenity include the general characteristics of the locality, including the presence of any feature of historic, architectural, cultural or similar interest;
 - (b) factors relevant to public safety include;
 - (i) the safety of persons using any highway, railway, waterway, dock, harbour or aerodrome (civil or military);

- (ii) whether the display of the advertisement in question is likely to obscure, or hinder the ready interpretation of, any traffic sign, railway signal or aid to navigation by water or air;
- (iii) whether the display of the advertisement in question is likely to hinder the operation of any device used for the purpose of security or surveillance or for measuring the speed of any vehicle.
- (3) In taking account of factors relevant to amenity, the local planning authority may, if it thinks fit, disregard any advertisement that is being displayed.
- (4) Unless it appears to the local planning authority to be required in the interests of amenity or public safety, an express consent for the display of advertisements shall not contain any limitation or restriction relating to the subject matter, content or design of what is to be displayed.

National Planning Guidance

Planning policy is provided at the national level by the National Planning Policy Framework (NPPF). It is a material consideration in planning decisions.

It is not necessary to quote extensively from this document but the following points are highlighted.

National Planning Policy Framework (December 2024)

The Government's latest National Planning Policy Framework (NPPF) was published in December 2024 and the Government's approach is to continue to strongly support communications infrastructure. The NPPF remains very supportive of high-quality communications. Indeed, a whole chapter is dedicated to high-quality communications, emphasising the importance that the Government attaches to digital connectivity. Paragraph 118 states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. This wording echoes the guidance set out in paragraph 42 of the 2012 version of NPPF. However, it also includes the importance of *reliable* communications infrastructure for both economic growth *and social well-being*.

The NPPF continues to support the expansion of electronic communications networks at paragraph 119. It notes that 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. The economic and social benefits of providing high-quality and reliable communications infrastructure are well documented and can be found later in this Supporting Information Statement.

The NPPF supports the provision and promotion of sustainable transport at section 9. These relevant policies are set out below:

Paragraph 116 - 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 117 - 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 makes reference to 5G and electronic communications systems:

'Planning policies and decisions should support the expansion of electronic communications networks, including next-generation mobile technology (such as 5G).'

With the above in mind, the Government is already forward-thinking the evolution of data networks and seeks planning decisions to take account of this. 5G technology provides increased speed of data and more capacity in the network, to ensure that handheld devices can continue to be used for the

purposes in which they were purchased. This will bring even greater economic and social benefits to the area.

Paragraph 120 goes further by stating the *'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.'* The design of the proposal as an advertising column, similar to well-established street furniture such as advertisements built into bus shelters, provides WiFi capability but also crucially small cell coverage and capacity for 5G services. All of this is camouflaged within the unit, contributing to the extension of the 5G network which undoubtedly becomes a contentious issue in the near future. It should also be noted that where possible, existing buildings (ie kiosks) have been removed via relocation to accommodate the proposed development.

Paragraph 123 of the NPPF retains the guidance set out in paragraph 46 of the 2012 NPPF version which relates to determining 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 141 - 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.

At the heart of the NPPF is the retained presumption in favour of sustainable development (para 11). For decision-taking, this means approving development proposals that accord with an up-to-date development plan without delay or where there are no relevant development plan policies or the policies which are most important for determining the application are out-of-date, granting permission unless the application of policies within the revised Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed or any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits when assessed against the policies in the revised Framework taken as a whole.

The NPPF continues to provide guidance on decision-making. At paragraph 39 it states that:

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

The NPPF builds on the aspiration to build a strong, competitive economy. Paragraph 85 states:

'Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken, should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation⁴²...

Code of Practice for Wireless Network Development in England (March 2022)

The Code of Practice provides guidance to Code Operators (referred to as ‘operators’ throughout the Code of Practice), including the Mobile Network Operators and wireless infrastructure providers, their agents and contractors, local planning authorities, and all other relevant stakeholders in England on how to carry out their roles and responsibilities when installing wireless network infrastructure. It is also a useful tool for other interested stakeholders such as community groups, amenity bodies and individuals with an interest in mobile connectivity.

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

The Code of Practice covers all forms of wireless infrastructure development, including mobile towers and cabinets. It is recommended that other wireless communications operators follow the principles of this Code of Practice, where appropriate.

Unlike previous iterations this Code of Practice has been led by the Department for Digital, Culture, Media and Sport (DCMS) and developed in collaboration with representatives of the mobile network industry, other government departments and public bodies, local planning authorities, and protected landscapes. This document replaces the previous Code of Best Practice on Mobile Network Development, which was published in 2016 and is now published by DCMS.

The Code of Practice sets out the legal and policy framework for the delivery of wireless infrastructure development.

Paragraphs 8 – 12 of the Code of Practice set out the importance of connectivity:

‘8. Digital connectivity is vital to enable people to stay connected and businesses to grow. Fast, reliable digital connectivity can deliver economic, social and well-being benefits for the whole of the UK.

9. As the demand for mobile data in the United Kingdom is increasing rapidly, it is important that everyone has access to dependable and consistent mobile coverage where they live, work and travel.

10. The Future Telecoms Infrastructure Review (FTIR) and the National Infrastructure Strategy set out the government’s long-term strategy for meeting its digital connectivity targets and delivering high-quality, the reliable digital infrastructure that works across the UK¹.

11. The government has committed to extending mobile coverage across the UK. The government has committed to extending mobile coverage across the UK. The government’s Levelling Up White Paper has set a mission that the UK will have nationwide 4G coverage, with 5G coverage for the majority of the population by 2030. In support of this, the government and the UK’s mobile network operators agreed to a £1 billion Shared Rural Network deal to extend 4G mobile geographical coverage to 95% of the UK by the end of the programme.

12. Next Generation Mobile Technologies: A 5G Strategy for the UK, and the update to this, set out the government’s ambition for the UK to be a global leader in 5G to take early advantage of its potential and help to create a world-leading digital economy that works for everyone. The government also wants businesses and communities to benefit from investments in 5G as soon as possible. Through the government’s 5G Testbeds and Trials programme we have seen its value to manufacturing, farming, transport networks and healthcare.

The Government recognises the key role that the Planning System plays 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.

¹ The [Statement of Strategic Priorities for Telecommunications, The Management of the Radio Spectrum, and Postal Services](#) followed the publication of the FTIR and reflects its conclusions

The Code of Practice sets out 'How wireless networks function'.

Para. 16 states *"Cellular wireless networks use base stations to provide an area of radio coverage. Wireless technology uses the radio spectrum to broadcast radio waves between base stations and devices. Different radio frequencies have different characteristics which, along with the density of cell site locations, affect the extent of coverage and how much data can be carried over the network. Depending on the radio frequencies used, base stations can deliver coverage over a wide area or provide extra network capacity in areas where there is a high demand for network bandwidth"*.

Para. 17 sets out that *"Wireless technology continues to evolve rapidly, and mobile devices are now capable of much more. Second-generation (2G) technology gave us voice calls and text messages, 3G led to the launch of smartphones, and 4G, which enabled faster browsing, allowed us to do things like watching videos on the move. 5G, the latest generation of wireless technology, is much faster than previous generations of wireless technology and can offer greater capacity and lower latency, allowing thousands of devices in a small area to be connected at the same time. 5G networks, and future mobile generations, will be vital for a range of Internet of Things uses (IoT) and Smart City applications"*.

The Code of Practice establishes 'Principles and commitments' by which operators should develop their networks and that Local Planning Authorities should demonstrate their support.

Paragraph 18 of the Code of Practice sets out the principles and commitments that operators should follow when developing their networks inter alia:

- Site sharing and use of existing structures: make use of existing structures, sites and towers wherever possible to reduce the need for new development.
- Consultation with local planning authorities, local communities and other stakeholders.
- Standardised and high-quality approach to planning applications, and the notification procedure: provide standardised supporting documentation for planning applications (where appropriate) within the context of national and local requirements.
- Compliance with guidance laid out in the International Commission on Non-Ionizing Radiation (ICNIRP) public exposure levels guidance.

The Code of Practice also sets out the requirements of the LPA in relation to the deployment of digital infrastructure:

- Incentivising connectivity: support the expansion of telecommunications networks and take a 'joined-up' approach to the wireless infrastructure planning process, including ensuring that Local Plans effectively support the deployment of digital infrastructure.
- Facilitating sites: engage with operators when new sites have been proposed and discuss site requirements.
- Engagement with operators: respond positively to requests for engagement and make decisions in line with national policy and Local Plans. For planning applications, find solutions to issues and ensure timely decisions are made.

The added emphasis on support from Local Planning Authorities in the deployment of digital infrastructure is even more evident in the revised Code of Practice. The Code of Practice recognises the importance of collaboration and partnership to help drive network coverage across the country. It goes on to state that *'In all instances, it is important for all parties involved in the process to take a positive approach to consultation and engagement'*.

Local Planning Policy

Local Plan (Core Strategy) 2011

Where applicable, it is considered that the following Waterloooville Local Plan 2036 policies are applicable and in accordance with this case –

- Policy CS4 Town, District and Local Centres
- Policy CS6 Regeneration of the Borough
- Policy CS8 Community Safety
- Policy CS16 High Quality Design

Policy CS4 Town, District and Local Centres

Planning permission will be granted for appropriate town centre development proposals that:

- *Enhance the evening economy of the town and district centres.*
- *Retain and enhance local markets.*
- *Support small and independent businesses.*

The proposal will also contribute to the evening economy by providing services that will allow people to find their destination, suggestions of where to go and a means of how to leave at the end of their visit. The services will also provide a safety net for the more vulnerable, with free services to remain in contact with charging facilities and the free Wi-Fi if they have no remaining data.

Whilst the services offered do not directly attract visitors to the area, they will improve the experience that will inevitably lead to return visits. The benefits will be available to the local community and to visitors, with wayfinding services that will support local markets and small businesses. For example, this is because it is anticipated that free Wi-Fi and wayfinding will support increased use of walking and public transport, increasing awareness of the area and will also indirectly support the reduced reliance on private motor vehicles.

Policy CS6 Regeneration of the Borough

Planning permission will be granted for development which positively contributes by type of use and design and by its comprehensive approach to the social, economic and/or physical regeneration of the whole borough.

The Street Hub project seeks to justify the proposed development by removing ~~xno~~ of existing BT telephone kiosks that are no longer fit for purpose and do not provide a public service that supports their continued presence in the public realm. The Street Hub will therefore contribute to the regeneration of the area by providing a host of free services compared to the existing kiosks that only offer a service for voice calls that require payment. Therefore, the proposal represents a significant improvement to the efficiency of the use of public space with an improved public service. The service of calls that require payment clearly no longer provides a tangible benefit to the community, so the proposed kiosk will contribute to meeting the future needs of the community.

Policy CS8 Community Safety

Planning permission will be granted for development proposals that:

1. *Engrain community safety into the development process from the beginning.*
2. *Provide well-lit footpaths, cycle ways and roads providing that this does not adversely affect designated habitats or the landscape.*
3. *Maximise opportunities for natural surveillance through good design.*

The existing kiosks are reaching the end of their natural lifespan and it is accepted that as they do so, they deteriorate in quality items of street furniture that becomes a magnet for anti-social behaviour. This includes vandalism and also using the inside of the kiosk as means to break the law.

The proposed Street Hub, however, has an open plan when being used and reduces the ability for concealment. There is a frequent maintenance schedule for each unit wherein they are cleaned regularly and kept in working condition and is elaborated upon in the BT Street Hub Anti-Social Behaviour Management Plan that accompanies this application. Unlike the predeceasing phone boxes, which have fallen into disrepair and accommodate anti-social behaviour, the new BT Street Hubs will act as a modern, clean and usable street furniture replacement.

Policy CSI6 High Quality Design

Planning permission will be granted for development that is designed to a high standard, which helps to create places where people want to live, work and relax. All development should demonstrate that its design:

- 1. Responds to, draws inspiration from and respects local context and:*
 - Identifies and responds positively to existing features of natural, historic or local character within or close to the proposed development site;*
 - Uses the characteristics of the locality to help inform the design of the new development including heights, massing, existing buildings lines, plot widths and depths, materials and proportions of windows and doors;*
 - Is well connected to and integrates with the immediate local area and the wider area by linking to existing pedestrian and cycle routes and encouraging people to use public transport where possible; and*
 - The development does not cause unacceptable harm to the amenity of neighbours through smell, the loss of privacy, outlook, noise and overlooking.*
- 2. Produces a positive relationship between buildings, street and spaces both existing and proposed, where:*
 - The layout of the development reduces opportunities for crime and antisocial behaviour; contributes to improving community safety; and makes provision for the management and maintenance of the development;*
 - The layout of the development is legible, meaning it is easy to orientate oneself and move through.*
- 3. Contributes to the improvement of the public realm close to the development, particularly sites close to town, district and local centres and other priority regeneration areas by using high quality hard and soft landscape material and street furniture; and where development is of a significant scale or prominence makes provision for public art.*
- 4. Is inclusive by considering the needs of those with disabilities, ensuring safe and convenient access for all; and integrating affordable and supported housing with market housing through tenure blind design to minimise social exclusion and promote social integration.*
- 5. Maximises opportunities for mixed use developments, particularly in town and district centres; and encourage higher densities (50+ dwellings per hectare) where appropriate.*
- 6. Mitigates negative environmental impacts through sustainable design and construction methods, resource efficiencies, particularly water and the provision of facilities for waste recycling.*
- 7. Adapts to the changing needs of the users and the changing climate over the lifespan of the building.*

The BT Street Hub has been designed to have a minimal appearance within the surrounding commercial character and setting of the areas where it is proposed to be sited. The border of the main display consists of darker shades to soften the visual impact of each unit and to keep the impacts of amenity and setting to an acceptable level. Lighting is reduced at night to reduce the impact on light

pollution and to keep from being an overbearing visual addition to the street scene. This proposal will be of a high-quality design and usability, directly improving the street scene of the area by replacing a dilapidated, and anti-social item of street furniture. The removal of dilapidated boxes will remove threats to positive character of areas, whilst the installation of the new street hubs presents an opportunity to enhance areas local distinctiveness by highlighting Waterloo's status as a district centre.

Street Hub is a modern form of development, and in many ways, its innovative design attributes reflect the technological advancements within the field of electronic communications over the course of the last decade. In order to accommodate the equipment necessary to provide the immediate and future benefits to the area as previously outlined, including the advertising feature, the unit has to be the height and design that is proposed. In particular, the size of the Street Hub unit is specifically required because the kiosk will accommodate 5G antennas and the height is necessary in order to meet the criteria for ICNIRP compliance. Whilst there will always be some degree of harm from any form of development, the positive impact that the proposal will bring to the area will outweigh the negative impact.

As outlined above, the services will contribute to the greater use of walking and public transport options, that will connect and integrate. The removal of the existing kiosks will directly improve the public realm by providing a modern feature that will become a focal point of interest and then an accepted feature of street furniture that provides a valuable service.

It is important to highlight that the proposal removes the restricted access of the existing kiosk that will allow access to the entire community, including those with disabilities such as wheelchair users and those with visual or hearing impairments.

Local Plan (Allocations) 2014

- Policy AL1 Presumption in Favour of Sustainable Development
- Policy AL3 Town, District and Local Centres
- Policy DM20 Historic Assets
- Policy DM21 Shopfronts, Signs, Security Shutters and Advertisements

Policy AL1 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 (NPPF). It will always work proactively with applicants to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in this local plan will be approved without delay, unless material considerations indicate otherwise. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision, then the Council will grant permission unless material considerations indicate otherwise, taking into account whether:

- 1. Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or*
- 2. Specific policies in the NPPF indicate that development should be restricted.*

The justification outlined above sets out that the proposal will contribute to the improvement of economic, social and environmental conditions in the area by removing a redundant item of street furniture and provide services that will encourage more people to visit and return. The only significant difference will be the height, which is specifically required and the digital advertisement feature that



will eventually become the ubiquitous form that advertising will take. It is therefore considered that the benefits will outweigh any potential impacts.

Policy AL3 Town, District and Local Centres

Planning permission will be granted for development proposals that:

- 1. Provide main town centre uses in the town, district and local centres as defined on the Policies Map, and so contribute to their vitality and viability.*
- 2. Promote and enhance the primary shopping areas of the town and district centres.*
- 3. Retain at least 50% of the units in an unbroken run of primary frontage as defined on the Policies Map in retail (A1) use.*
- 4. Retain at least 25% of the units in an unbroken run of secondary frontage as defined on the Policies Map in retail (A1) use.*
- 5. Generate pedestrian activity within the primary shopping area by being open during the day to visiting members of the public.*

We would refer the justification above that outlines how the proposal supports Policy AL3.

Policy DM2I Shopfronts, Signs, Security Shutters and Advertisements

Planning permission will be granted for shopfronts, signs, security shutters and advertisements where:

- 1. They are appropriate in size, scale and design to the character of buildings and their surroundings, including conservation areas, heritage assets and Chichester Harbour Area of Outstanding Natural Beauty (AONB).*
- 2. They will not result in a cluttered appearance either on individual buildings or on the streetscene as a whole.*
- 3. They do not have a detrimental impact upon public safety. In particular, advertisements and signs must not negatively impact upon highway safety for both vehicular and pedestrian movements.*
- 4. The level of illumination proposed does not result in significant levels of light pollution and does not have a detrimental impact upon the amenity of the local area. In the interests of amenity and public safety, individually illuminated letters may be preferable over entirely illuminated signs.*

The proposed Street Hub will occupy a similar position on the footway as the existing kiosk, which also supports an advertisement feature and does not pose a risk to highway safety. The proposed development would be located within the pedestrianised commercial area, whose large retail frontage means that the digital advertisement would not appear alien or out of context to the character of the area or create a hazard that will impact highway safety.

Planning History

There is no history of InLink or Street Hub units at or near the application site on Queens Parade.

Direct conversion

In this instance the proposed Street Hub has been progressed as a direction conversion of an existing BT kiosk as it is considered that its siting and appearance continues to fit into its immediate street scene context. It is felt that the Street Hub will be a clear improvement from the existing on-site arrangement.



Siting Justification against Planning Policy

At the conception stage, we have tried to focus on pursuing direct conversions of existing kiosks wherever practicable. Also, we have looked for locations with wide pavements, and where a sites relationship with existing street furniture avoids undue proliferation of clutter. It should be recognised that BT's legacy estate of payphones has grown up organically over the years, in which the whereabouts of BT kiosks can sometimes sit in environments that have changed dramatically around them. In some instances, the BT Street Hub project has been seen as an opportunity to improve the pedestrian environments 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 universal service obligation with Ofcom to provide a street level phone service, so the selection process of kiosks to be removed had to cater for this, 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 Street Hub sites wherever possible, so that this can improve the user connectivity experience as they travel through an area.

Likewise, as 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 Street Hub sites along key routes, so that the information gathered can be better analysed. This free environmental data has its own 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 Street Hubs have the capability to monitor pedestrian, cyclist, and vehicle movements, hence in building a strategic network of 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 of something that has an established presence on-site, like a telephone kiosk to a Street Hub unit, 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 call boxes with Street Hub units where they will be in-keeping with their existing surroundings. In this regard it is seen as an opportunity to help future proof the high street making them smarter, safer, and more sustainable.

In progressing new 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 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 that particular street scene where the new Street Hub. With regards to its associated advertisement screens, thought has been given to its immediate context and public safety in terms of pedestrian and vehicular movements. These criteria have been adjusted where necessary on a site-by-site basis to account for local context and policy requirements when reassessing the site's suitability to accommodate a new Street Hub unit.

Justification for the siting and appearance of the proposed Street Hub, 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 Street Hub at the application site, creates a significant visual harm as to 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 Street Hub. Also, as previously highlighted at a strategic level there are generally 2no BT call boxes removed with every Street Hub proposed. The removal of these existing call boxes will declutter street scenes throughout the authority and when comparing the footprint of existing call boxes to be removed and proposed Street Hub, it will declutter more pavement and so free up space.

Queens Parade is a busy pedestrianised street which can be described as part of the main retail centre in Waterloooville. The street scene context immediate to the proposed BT Street Hub site is generally commercial and comprises of a number of shops, restaurants, commercial services and residential space on the upper floors. In the immediate vicinity of the proposed BT Street Hub site there is existing street furniture including traffic lights, modern and busy shop frontages, streetlights, bike racks, seating and litter bins.

Appearance

The proposed BT Street Hub unit is an advanced, modern development which has been designed following significant improvements in technology and digital content over recent years. It can promote the image of the authority as a vibrant place, and 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 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 unit. The appearance of the structure is not considered to be harmful to the wider street scene, especially when taking into account the nature of the existing payphones to be removed. We believe the appearance of the area and street scene will not be compromised by the proposed new BT Street Hub.

The new structure will be set within a generally commercial setting that is dominated by 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, its appearance would not be out of keeping with the commercial nature of the area, which is well lit by streetlights, window displays and headlights. In this context, the BT Street Hub design would not appear detrimental to the amenity of Queens Parade.

It is concluded that the design of the proposed Street Hub is justified, and its appearance is an improvement when compared to the BT call boxes that are to be removed in association. Therefore, it is considered that the appearance of the proposed Street Hub is acceptable and is in accordance with national and local planning policies.

Pavement Width

The total existing pavement width at this location is 24m, the total width of the Street Hub is 1.236m and there will be 7.47m distance from the edge of the Street Hub to the nearest property. 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 advertisements 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 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 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 not considered that the Street Hub would appear as an untoward feature to passing motorists.

Regarding pedestrian safety, the 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.

The area surrounding this specific site is visually busy and typical of this area of Waterloo at ground elevation. This proposal would be an addition to the ground elevation and in context with the surrounding street furniture.

The proposed usage for the screens has been set in accordance with Schedule 1 of The Town and Country Planning (Control of Advertisements) (England) Regulations 1984:

1. Any advertisements displayed, and any site used for the display of advertisements, shall be maintained in a clean and tidy condition to the reasonable satisfaction of the local planning authority.
2. Any structure or hoarding erected or used principally for the purpose of displaying advertisements shall be maintained in a safe condition.
3. Where an advertisement is required under these Regulations to be removed, the removal shall be carried out to the reasonable satisfaction of the local planning authority.
4. No advertisement is to be displayed without the permission of the owner of the site or any other person with an interest in the site entitled to grant permission.
5. No advertisement shall be sited or displayed so as to obscure, or hinder the ready interpretation of, any road traffic sign, railway signal or aid to navigation by water or air, or so as otherwise to render hazardous the use of any highway, railway, waterway or aerodrome (civil or military)

The Transport for London's (TfL) policy document 'Guidance for Digital Roadside Advertising and Proposed Best Practice – 2013' [the TfL Guidance] has also been a key document in the design and site selection process.

In addition to the above conditions, each 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 is existing traditional advertisement on similar sections of the respective roads in many cases.
- The geometry of the roads is not complicated, and the driving conditions are not considered to be demanding or complicated.
- The advertisements would not be experienced by a driver in conjunction with any other similar digital advertisements.
- As per the TfL guidance, the advertisements would be located as close to the driver’s natural eye line as possible and facing as head-on to the traffic as is practical.

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 (2023). A copy of this document is appended for clarity.

Noise Management

As one of many features, Street Hubs provide free phone calls via a speaker and microphone system. The following document identifies the steps we are able to take to ensure that these calls, like all the features of the Street Hub, help improve the amenity of a local area whilst also respecting the expectations of local community over time. Please note: this noise management plan refers specifically to the noise from the Street Hub. Noise from pedestrians, users of the Street Hub, or from other nearby sources are not included and would typically be considered matters for the Police and other authorities who have the appropriate and relevant powers to act on such issues if necessary.

We have designed our Street Hub so that they create a ‘sound cloud’ for the person making a call with noise levels sufficient to make calls with background noise for the surroundings. Whilst this generates a reasonable conversational volume in proximity to the Street Hub, it is intended to result in minimal to no noise being noticeable further away. The average volume settings are 65dB average at 3m distance from each Street Hub. Users may also choose to use headphones when making calls or using the tablet, which deactivates the speaker for the duration of their use.

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

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

Daytime (07:00 – 21:00)

Street Hub have controllable volume levels. This will default to 50% at the start of any user activity during the day and can be increased and decreased based on the preferences of the user.

Night Time (21:00 – 07:00)

Between the hours of 21:00 to 07:00 all Street Hub will be governed so that the volume cannot be increased to greater than 60% of the maximum volume.

Exceptional Circumstances

We manage noise by exception based on feedback from users and the local community. If we receive any feedback that the Street Hub may be causing detrimental environmental impact, we take the following actions:

1. Understand the reason for the issue and any extenuating circumstances. At this point we will separate out any Police or community safety matters and work directly with the relevant authorities, and support the local residents in raising these issues through official channels where appropriate.
2. We will then verify the evidence provided against the Street Hub's call history and other operational data as required. This will allow us to understand the number, time, and frequency of outbound calls being made and better understand the severity of the reported situation.
3. Once we have verified the situation, we will typically look to apply local bespoke volume governor controls appropriate to the situation. We have found that reducing the Street Hub's maximum volume to 40% during relevant periods tends to resolve issues where they have been identified.
4. We will continue to monitor the situation and listen to ongoing feedback from the community as we do take matters seriously. We continue to learn as part of our roll out how Street Hub are fitting in to the community.

Further information

We want each Street Hub to provide the best possible experience for users and the communities around them, and will continue to work with councils, police, and the wider community to make sure they do. For more information on Street Hubs and how they are managed contact streethub@bt.com

Conclusion

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

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

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

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.