Planning, Design and Access Statement

Our Ref.	**UK-000017**
Address	**Procter Street (Outside No. 5 – 11, junction of Catton Street) London**
Postcode	**WC1V 6NX**
NGR:	**NGR: E530586, N181595**
Project Type	**BT Street Hub 3**
Conservation Area	**N/A**
TFL Red Route	**Yes**

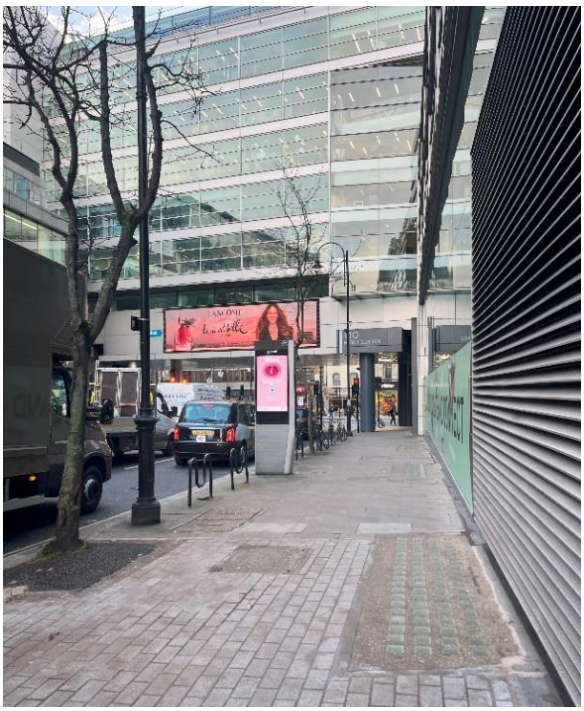
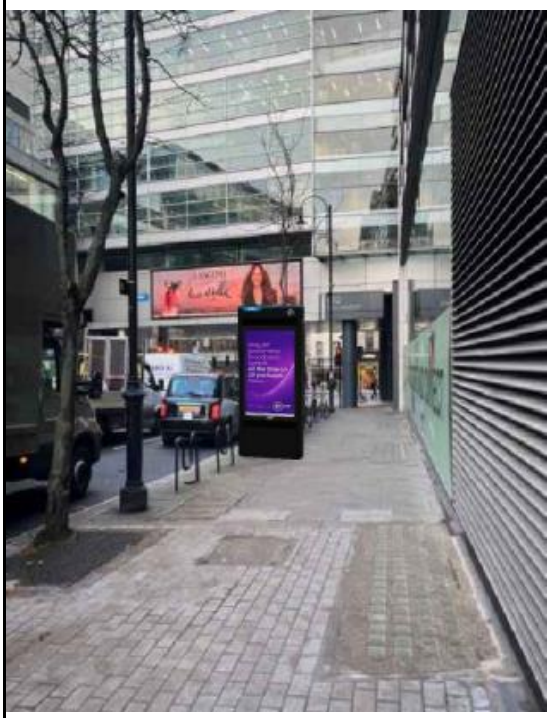
As part of BT's collaborative approach to connecting and improving local streets, Full Planning Permission and Express Advertisement Consent is sought for the removal of an existing InLink Unit, and the installation of a replacement BT Street Hub 3, at the above location.

To recap, the InLink UK service was first launched in 2017 and led to the deployment of circa 500 InLink Units across 23 cities. These first-generation units offered 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. LED display screens on each side of the Unit carried advertising, which helped to fund the Units themselves, and its free services.

InLink UK-000017 was granted Full Planning Permission (Ref: 2017/0455/P) and Express Advertisement Consent (Ref: 2017/0582) by the Local Authority on 15/05/2017.

Following these planning approvals, and the deployment of the InLink unit for the last 7 years at this location, BT now wish to upgrade the Unit, as the existing Unit is starting to reach the end of its operational life.

The proposed replacement Unit, the BT Street Hub 3, is the most modern unit available and BT are keen to deploy these within your Local Authority area, in place of the existing InLinks.

Existing InLink Procter Street (Out WC1V 6NX side No. 5 – 11, junction of Catton Street) London,	**Proposed BT Street Hub 3** Procter Street (Outside No. 5 – 11, junction of Catton Street) London, WC1V 6NX
	

The BT Street Hub 3 is the next generation Unit, with improved features and capabilities including environmental sensors, insight counting and small cell mobile connectivity. The addition of the 5G capability into the Street Hub 3 is very much in-line with current UK Government 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. The NPPF, in paragraph 119, 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. The BT Street Hub 3 has been designed to accommodate sensors such as air quality monitoring. 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 can be a useful source of data in the delivery of the Local Authority's own green agenda.

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.

BT are continuing their commitment to invest in and improve the high street, with ever-improving street furniture. The upgrading of this InLink with a Street Hub 3 unit, is no different to the previous upgrading of the traditional telephone kiosk with an InLink unit.

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 3.

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.

Given that Full Planning Permission and Express Advertisement Consent were both granted by the Local Authority in May 2017, for the installation of an InLink Unit at this location, it is anticipated that Officer support will be forthcoming for the proposed upgrading of this existing and established street furniture.

For the avoidance of doubt, all existing services currently available from the InLink Unit, will be replicated within the Street Hub 3 unit.

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.

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

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:

National Planning Policy Framework, December 2024

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.

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

In the context of transport related matters as set out in Section 9 of NPPF, the following paragraphs are applicable to this application:

"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 also supports the provision of high-quality communications infrastructure as set out in Section 10. These relevant paragraphs are highlighted below:

"Paragraph 119 – 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 120 – 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.

Paragraph 123 – 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 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:*
c) approving development proposals that accord with an up-to-date development plan without delay; or
d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

> *i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or*
> *ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole*" .

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 innovation'…*

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

The Code of 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 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 the 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 UK.*
>
> *11. 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.*
>
> 9. *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.

The Code of Practice sets outs '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.

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 PLAN ASSESSMENT

The London Plan, 2021

A new London Plan was adopted in March 2021. In a similar fashion to the previous London Plan (2016), the new London Plan sets out the Mayor's planning strategy for Greater London and contains strategic thematic policies, general crosscutting policies and more specific guidance for sub-areas within the Metropolitan Area. In 'Policy SI 6: Digital Connectivity Infrastructure' the Plan recognises the strategic importance of providing the necessary infrastructure, including modern communications networks, that London requires to ensure its global competitiveness, now and in the future.

It is considered that the Operators' networks are an integral element in securing the Mayor's vision for the delivery of modern communications networks across London. The written justification for Policy SI 6 states the following:

*"The **provision of digital infrastructure** is as important for the proper functioning of development as energy, water and waste management services and should be treated with the same importance. London should be a world-leading tech hub with world-class digital connectivity that can anticipate growing capacity needs and serve hard to reach areas. **Fast, reliable digital connectivity is essential in today's economy and especially for digital technology and creative companies. It supports every aspect of how people work and take part in modern society, helps smart innovation and facilitates regeneration**…*

Boroughs should encourage the delivery of high-quality / world-class digital infrastructure as part of their Development Plans".

Policy SI 6, and its written justification, is clearly supportive of the proposal and the role it will perform allowing to provide enhanced coverage to the surrounding area.

In addition to a specific digital policy, there are the following policies within the London Plan which are considered, where applicable, relevant and in accordance with this case:

CG1 – Building strong and inclusive communities
SDG6 – Town centres and high streets
D5 – Inclusive design

D8 – Public realm
D11 – Safety, security and resilience to emergency
S1 – Developing London's social infrastructure
E1 – Visitor infrastructure
HC6 – Supporting the night-time economy
SI 1- Improving air quality

London Infrastructure Delivery Plan 2050 (published 2014):

As part of the work on the 2015 London Plan Alterations, the Mayor commissioned work to develop a long-term infrastructure investment plan for London, and in 2014 the 'London Infrastructure Delivery Plan 2050' was published. The stated aim of the Infrastructure Delivery Plan is to provide for fast, ubiquitous access to the internet from mobile and fixed devices. Chapter 16 of the Plan, Digital Connectivity, indicates how the Mayor's Office will support a mix of technologies including mobile broadband and future methods of wireless internet delivery to address the capacity crunch in the short term, as well as aiming to make London the first capital city in the world to deploy 5G in the 2020s. Deployment of the proposed base station will contribute to London's agenda for reliable high-speed communications as it has been designed to incorporate emerging and future technologies. Among other matters the Delivery Plan stated:

"Broadband is now considered the fourth utility. The Government has stated that it wants 99% of the population to have superfast connections by 2018. Internet access speeds and coverage affect the productivity of businesses and are now a factor considered by homebuyers. Access is not only essential to many businesses, but also, as more local authorities are encouraged to move the services they provide online, access is essential for residents to be able to take part in a modern society. The Mayor wants every resident and business in London to be able to have affordable high-speed internet connectivity, should they choose to access it".

This proposal seeks, individually, to provide high speed internet connectivity throughout London and create a connected city as per chapter 6 of the Plan. The upgrading of Street hubs and installation of new sites will actively contribute to this policy.

Camden Local Plan 2017

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

Policy A1 – Managing the impact of development

A. *seek to ensure that the amenity of communities, occupiers and neighbours is protected;*
B. *seek to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities;*

C. *resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network;*
D. *require mitigation measures where necessary.*

Policy C5 – Safety and security

a. *work with our partners including the Camden Community Safety Partnership to tackle crime, fear of crime and antisocial behaviour;*
b. *require developments to demonstrate that they have incorporated design principles which contribute to community safety and security, particularly in wards with relatively high levels of crime, such as Holborn and Covent Garden, Camden Town with Primrose Hill and Bloomsbury;*
c. *require appropriate security and community safety measures in buildings, spaces and the transport system;*
d. *promote safer streets and public areas;*
e. *address the cumulative impact of food, drink and entertainment uses, particularly in Camden Town, Central London and other centres and ensure Camden's businesses and organisations providing food, drink and entertainment uses take responsibility for reducing the opportunities for crime through effective management and design;*
f. *promote the development of pedestrian friendly spaces.*

Policy C6 – Access

a. *expect all buildings and places to meet the highest practicable standards of accessible and inclusive design so they can be used safely, easily and with dignity by all;*
b. *expect facilities to be located in the most accessible parts of the borough;*
c. *expect spaces, routes and facilities between buildings to be designed to be fully accessible;*
d. *encourage accessible public transport; and e. secure car parking for disabled people.*

Policy D1 – Design

a. *respects local context and character;*
b. *preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;*
c. *is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;*
d. *is of sustainable and durable construction and adaptable to different activities and land uses;*
e. *comprises details and materials that are of high quality and complement the local character;*
f. *integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;*
g. *is inclusive and accessible for all;*
h. *promotes health;*
i. *is secure and designed to minimise crime and antisocial behaviour;*

j. *responds to natural features and preserves gardens and other open space;*
k. *incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,*
l. *incorporates outdoor amenity space;*
m. *preserves strategic and local views;*
n. *for housing, provides a high standard of accommodation; and*
o. *carefully integrates building services equipment.*

Policy D2 – Heritage

Designated heritage assets:

a. *the nature of the heritage asset prevents all reasonable uses of the site;*
b. *no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;*
c. *conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*
d. *the harm or loss is outweighed by the benefit of bringing the site back into use.*

Conservation areas:

e. *require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;*
f. *resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;*
g. *resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and*
h. *preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden's architectural heritage.*

Listed Buildings:

i. *resist the total or substantial demolition of a listed building;*
j. *resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building;*
k. *resist development that would cause harm to significance of a listed building through an effect on its setting.*

Policy D4 – Advertisements

a. *preserve the character and amenity of the area;*
b. *preserve or enhance heritage assets and conservation areas…*
c. *contribute to an unsightly proliferation of signage in the area;*
d. *contribute to street clutter in the public realm;*

e. *cause light pollution to nearby residential properties or wildlife habitats;*
f. *have flashing illuminated elements;*
g. *impact upon public safety*

Policy E1 – Economic Development

a. *support businesses of all sizes, in particular start-ups, small and medium-sized enterprises;*
b. *maintain a stock of premises that are suitable for a variety of business activities, for firms of differing sizes, and available on a range of terms and conditions for firms with differing resources;*
c. *support local enterprise development, employment and training schemes for Camden residents;*
d. *encourage the concentrations of professional and technical services, creative and cultural businesses and science growth sectors in the borough;*
e. *support the development of Camden's health and education sectors and promote the development of the Knowledge Quarter around Euston and King's Cross while ensuring that any new facilities meet the other strategic objectives of this Local Plan;*
f. *direct new office development to the growth areas, Central London, and the town centres in order to meet the forecast demand of 695,000sqm of office floorspace between 2014 and 2031;*
g. *support Camden's industries by: i. safeguarding existing employment sites and premises in the borough that meet the needs of industry and other employers; ii. supporting proposals for the intensification of employment sites and premises where these provide additional employment and other benefits in line with Policy E2 Employment premises and sites; iii. safeguarding the Kentish Town Industry Area; iv. promoting and protecting the jewellery industry in Hatton Garden;*
h. *expect the provision of high speed digital infrastructure in all employment developments; and*
i. *recognise the importance of other employment generating uses, including retail, education, health, markets, leisure and tourism.*

Policy G1 -Delivery and location of growth

a. *supporting development that makes best use of its site, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site;*
b. *resisting development that makes inefficient use of Camden's limited land;*
c. *expecting the provision of a mix of uses where appropriate, in particular in the most accessible parts of the borough, including an element of self-contained housing where possible;*
d. *supporting a mix of uses either on site or across multiple sites as part of an agreed coordinated development approach, where it can be demonstrated that this contributes towards achieving the strategic objectives and delivers the greatest benefit to the key priorities of the Plan…*
e. *a concentration of development in the growth areas of, King's Cross, Euston, Tottenham Court Road, Holborn, West Hampstead Interchange and Kentish Town Regis Road;*

f. *development at other highly accessible locations, in particular Central London and the town centres of Camden Town, Finchley Road / Swiss Cottage, Kentish Town, Kilburn High Road and West Hampstead;*
g. *the Council's Community Investment Programme (CIP).*

Policy T1 – Prioritising walking, cycling and public transport

a. *improve the pedestrian environment by supporting high quality public realm improvement works;*
b. *make improvements to the pedestrian environment including the provision of high quality safe road crossings where needed, seating, signage and landscaping;*
c. *are easy and safe to walk through ('permeable');*
d. *are adequately lit;*
e. *provide high quality footpaths and pavements that are wide enough for the number of people expected to use them. Features should also be included to assist vulnerable road users where appropriate;*
f. *contribute towards bridges and water crossings where appropriate.*

Included within the Local Plan, the emphasis on digital infrastructure is evident. Camden's aim is to improve internet access including public wireless systems. As the policy outlines, the aim is to support projects which will create better connections for business and residential, greater use of digital technology and bridge the 'digital divide'. Therefore, the deployment of new, advanced Street Hub 3's will play a significant role in improving connectivity around Camden.

A key policy from the above is Policy D1 – Design. The policy states that any development must have good, high-quality design to meets requirements associated with respecting the local context, preserving historic environment, materials of high quality design, sustainable construction and design and is accessible for all. The proposal put forward is in line with Policy D1 as a Street Hub 3 is a future proof design with improved features and capabilities making it the most advanced Street Hub yet.

Policy D4: 'Advertisements' states that any advertisements must preserve or enhance the character of their settings while being in the fabric, design and scale of their setting. Also, limiting impact on public safety and street clutter. As outlined in this statement, the increased width of Street Hub 3 will have a minimal change to the street scene. Also, it has been ensured that the width of the remaining pavement will be sufficient for the flow of pedestrians.

Overall, the deployment of the Street Hub 3 is in line with the above polices to create inclusive environment, improve links between businesses and residents, provide a safe environment due to providing access to emergency services, the upgrading of sites will provide more advanced technologies and improve connectivity through the rollout of free wi-fi across Camden.

Justification for InLink Upgrade against Planning Policy

As the existing InLink at this location is nearing the end of its life, technology-wise, it must be replaced with a more modern Street Hub Unit. In this instance, BT are proposing a direct conversion on the same footprint – with the InLink removed, and the Street Hub 3 deployed in its place. Given that Permission for the existing InLink was granted in May 2017, it is not anticipated that the upgrading of this street furniture will result in any notable town planning or environmental impacts, and certainly not enough to justify the refusal of planning permission, or the grant of Advertisement Consent. It is submitted, in fact, that the upgrading of this street furniture aligns with the Council's own Local Planning Policies and will result in an improved streetscene.

The dimensions of the existing InLink Unit are provided below:
2900mm (h) x 890mm (w) x 280mm (d)

The Dimensions of the proposed replacement BT Street Hub 3 are also shown below:
2986mm (h) x 1236mm (w) x 350mm (d)

Clearly, the Local Authority considered the existing InLink to be appropriately sited when both Full Planning Permission and Express Advertisement Consent was granted in May 2017. Despite the slight increase in unit footprint of the proposed Street Hub 3, it is considered that sufficient footway width would be maintained at this location (2.5m), leading to no significant or unacceptable impact on pedestrian flow, public safety, or amenity within the immediate area.

The introduction of any form of development within a particular environment will always be, to some degree, a noticeable addition or change for those residents, businesses and regular passers-by found closest. However, being able to see something should not immediately infer that is causes harm. The existing InLink unit has been present within the streetscene for a number of years now, and, as with most technologies, the next generation of apparatus is now ready to be deployed, replacing the now-dated Units.

In regard to all of the above, the planning assessment which the Local Authority must undertake is very clear – is the replacement of the existing InLink with a Street Hub 3, appropriate and acceptable within the streetscene?

The principle of a ‘structure’ at this location is long-established, with permission granted in May 2017. All of the functions and services provided by the existing InLink will be continued with the Street Hub 3, ensuring continuity within the Local Authority area. The replacement of the existing InLink unit, with a

Street Hub 3, will assist in future-proofing the high street, making it smarter, safer and more sustainable. The siting of the replacement Unit, therefore, is considered wholly appropriate for the streetscene, as it will replace an existing Unit, and therefore accords with both local and national planning policy. As the proposed upgrade will result in no net gain of street furniture (i.e. it is a one-for-one swap), there will be no proliferation of apparatus, nor any additional street clutter, but rather a more modern, future-proofed Unit and streetscene.

It should be noted at this juncture, that, as per the Case Officers submitted under application 2017/0455/P, "*the site is located on a wide section of pavement in front of commercial units and in comparison to the kiosk it is replacing it is not considered to be harmful to the wider streetscene*". Furthermore, the Case Officer considered that the installation of the InLink, which replaced a traditional telephone kiosk, would be "*considered to be an improvement to the existing situation and is generally sufficient to allow enough space to free movement of people, retail customers and Link Unit users, in line with TfL guidance and Camden policies and guidance*". No conflict was identified with any Local Policy, and no objection was raised to the proposal.

It is submitted that the same assessment can be applied to the proposed BT Street Hub 3 Unit, which will replace the existing, acceptable and approved, InLink Unit, on the same footprint within the streetscene, with only a small increase of over 300mm in Unit width.

As with the existing InLink unit, the proposed Street Hub 3 will be operated in accordance with levels of illumination as set out in the Institute of Lighting Professional's *'Professional Lighting Guide 05/23: The Brightness of Illuminated Advertisements including Digital Displays*'

Pavement Width

The total existing pavement width at this location is over 4.3m. The total width of the BT Street Hub 3 is 1236mm. When compared to the width of the existing InLink, the replacement Unit is 346mm longer. For scale, this is slightly longer than a traditional school ruler (300mm).

With the proposed BT Street Hub 3 being located on the same footprint as the existing InLink, the available footway, which is being reduced by only 346mm, will still allow for safe circulation space around the unit and will not restrict passing pedestrians' movements. For the avoidance of doubt, were the Street Hub 3 to replace the existing InLink, 2.5m of footway will **remain** to allow pedestrians to pass-by. It should be noted that, given the Street Hub 3's width (350mm), the pavement will only be narrowed for a very small section.

When a balanced assessment, as advocated within the NPPF, is undertaken, the scheme is considered to find in favour.

Advertisements:

The 'principle' of two digital advertising display screens at this location was established the original permissions to deploy the InLink were achieved in May 2017. 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. As Advertisement Consent was granted for this InLink in May 2017, the principle of having two LED advertising screens at this location within the streetscene is already established, and was considered acceptable in 2017. It is therefore submitted that, as LED screens have been present in this location for a considerable period of time, the continuation of these LED screens should result in no **new** impact on the surrounding area, and certainly not one which should hamper the upgrading of the established and existing Unit.

The position where the existing InLink Unit is located, and the orientation of the advertisement screens, in relation to the road, does not cause unacceptable interference with nearby road signs and/or navigational lights. The proposed upgrading of this Unit would position the replacement Street Hub Unit on the same footprint on which the InLink currently stands. As such, it is submitted that the continued presence of LED advertising screens will result in no additional interference with nearby road signs, navigational lights, passing pedestrians or motorists.

When viewed within the street scene and context of the wider environment, it is considered that the replacement BT Street Hub would not appear as an inappropriate feature to motorists, which replicates the current situation with the InLink unit.

With regards pedestrian safety, the BT Street Hub will be positioned on the same footprint as the InLink. Therefore, it is not considered that it will impede pedestrian movements and that ample footway width will be retained.

Transport for London's (TfL) policy document 'Guidance for Digital Roadside Advertising and Proposed Best Practice – 2013' [the TfL Guidance] is a key document in relation to the proposed development. This InLink location was assessed against this guidance, and the Local Authority duly approved an

application for the deployment of the existing InLink in 2018. The proposed BT Street Hub 3 Unit would comply with the following additional criteria from the TfL Guidance.

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

The lighting levels noted above are within the levels set for this type and size of screen (those under 10m2) as set by the Institute of Lighting Professionals, Professional Lighting Guide 05: The Brightness of Illuminated Advertisements (PLG 05/23). 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.

Noise Management

The Street Hub 3 will follow the same noise management plan as the existing InLink. 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.

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.

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 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. All services and functions currently provided by the InLink Unit will be carried forward and continued via the Street Hub 3.

The proposed upgrading of an existing InLink unit with a replacement BT Street Hub 3 is considered to be wholly appropriate from a planning perspective. The principle of both the structure and the advertisement screens has been previously established, with the proposal now before the Council being one of an expected nature – i.e. the upgrading of street furniture which has reached the end of its life. Ultimately, there will no increase in street furniture, as this is a one-for-one swap.

We believe this statement has demonstrated that the upgrading of an InLink unit with a BT Street Hub 3, is in full accordance with both local and national planning policy. We submit that the application warrants support and that there are no material considerations that indicate otherwise. As such, we hope that this application can be supported by your Council.

Planning Conditions

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. Pavement surrounding the Street Hub shall be made good to the same condition as the adjacent land.
B. The intensity of the illumination of the two digital display screens shall not exceed 600 candelas per square metre (cd/m2) between dusk and dawn, in line with the maximum permitted recommended luminance as set out by 'The Institute of Lighting Professional's 'Professional Lighting Guide 05/23: The Brightness of Illuminated Advertisements including Digital Displays'.
C. The digital display screens shall not display any moving, or apparently moving, images (including animation, flashing, scrolling three dimensional, intermittent or video elements).
D. The minimum display time for each piece of content on the digital display screens shall be 10 seconds.
E. The interval between each piece of content on the digital display screens shall take place over a period no greater than one second; the complete screen shall change with no visual effects (including swiping or other animated transition methods) between displays and the display will include a mechanism to freeze the image in the event of a malfunction.
F. No content on the digital display screens shall resemble traffic signs, as defined in section 64 of the Road Traffic Regulation Act 1984.
G. This advertisement consent shall remain valid for a period of 10 years from the date of consent.

To justify condition G. suggested above, it is recognised that advertisement consent usually lasts for 5 years, however a local planning authority has discretion on this matter and can grant consent for a longer or shorter period. Even where advertisement consent is only granted for a period of 5 years, the advert may continue to remain in place after that period without submitting any further application (under Class 14 deemed consent). After the expiry of the 5 years initial consent, the local planning authority has the power to issue a discontinuance notice on the advert if they feel that such action is necessary to remedy a substantial injury to the amenity of the locality.

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 determination process.