

Planning, Design and Access Statement

Proposal

Freestanding BT panel providing phone and Wi-Fi facilities with 2 x internally illuminated digital advertisements following removal of existing BT telephone kiosks

Site

Grays Inn (OS No 05 Argos) WC1X 8PH

Our Ref

GF-Grays Inn-05

Prepared by

Primesight Limited The MET
Building 22 Percy Street London
W1T 2BU

Contents

01	Overview	3
02	Planning Considerations	6
03	Appearance / Unit Design	14
04	Unit Siting / Siting Justification (Site Specific)	20
05	Summary	23

01

Overview

1.1 This statement is prepared in support of the following:

- An application under Section 62 of the Town and Country Planning Act 1990 [the Act] for Planning Permission under Section 57 of the Act;
- An application under Regulation 9 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 [the Regulations] for Express Advertisement Consent under Regulation 4 of the Regulations.

1.2 The proposed development is a Link unit, part of the service comprised of a network of devices known as LinkUK from BT.

1.3 Links are sleek, modern kiosks that will replace many of the existing phone boxes across London, serving as the next evolution of BT's public payphone service. The Link unit will provide a far greater range of services to the public for free and bring digital innovation to the streets of London, meeting the needs of the public today and into the future. Users within range of a Link will be able to access free ultrafast Wi-Fi and other services including UK landline and mobile phone calls, mobile phone charging and access to local Council services. **These enhanced facilities will be provided at no cost to users or taxpayers as they will be funded by revenues from advertising on the Links' digital advertising screens.** As a part of the LinkUK regeneration strategy, Links will reduce street clutter in two ways: BT will commit to removing more payphones than Links going in, and Links take up much less space on the pavements than a standard

payphone they are replacing, dramatically reducing the overall footprint across the borough.

1.4 The Link unit was developed and piloted in New York City and has already begun to be rolled out across New York with transformative results. BT, along with its partners at LinkUK, is seeking to bring the same benefits to the UK, beginning with London.



Figure 1: Link unit in Camden

1.5 The unit includes the following features:

- Free 24/7 ultrafast public Wi-Fi
- Free UK landline and mobile phone calls
- Built-in Android tablet with touch screen display
- Apps providing local search, directions and listings
- Emergency and civic services

- Tactile keypad and Braille lettering
- Digital displays for advertising and public service announcements
- Rapid mobile phone charging via 2 USB ports
- Decreased footprint to reduce pavement clutter
- Full accessibility for wheelchair users
- Durable aluminium construction that's resistant to impact, with acid-resistant paint
- Integrated lighting
- Hardened, easy-to-clean construction (regular cleaning service will be provided by LinkUK)
- Open kiosk design with no movable parts reduces opportunities for anti-social behaviour and vandalism

1.6 The Planning Permission application relates to the Link unit as a whole. Under the advertisement regulations, Express Consent is also required for the advertisement element. Advertising has supported the viability of public telephone kiosks for many years and is found on the majority of existing kiosks in Camden. However, it has often been added as an afterthought to existing structures. **The Link unit is different, in that advertising has been an integral element of the design from the outset and is integral to the funding of the free services provided by Links to the public. As such, the unit cannot be installed without the advertisement element.**

1.7 Section 2 below details what are considered to be the relevant planning considerations; Section 3 details the design and appearance of the unit; and Section 4 details the criteria used to select the siting of the unit.

02

Planning Considerations

2.1 Main Issues

2.1.1 Applications for 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 Act).

2.1.2 As per Regulation 3 of the Regulations, applications for advertisement consent must be determined 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

2.2 National Policy

2.2.1 Section 5 of the National Planning Policy Framework [NPPF] – *‘Supporting high quality communications infrastructure’* – states the following with regard to developments to communication networks:

‘42. Advanced, high quality communications infrastructure is essential for sustainable economic growth. The development of high speed broadband technology and other

communications networks also plays a vital role in enhancing the provision of local community facilities and services.

43. In preparing Local Plans, local planning authorities should support the expansion of electronic communications networks, including telecommunications and high speed broadband. They should aim to keep the numbers of radio and telecommunications masts and the sites for such installations to a minimum consistent with the efficient operation of the network.'

2.2.2 LinkUK has the potential to significantly enhance the provision of local community facilities and services. Furthermore, the provision of free, ultrafast public Wi-Fi has the potential to reduce the demand for mobile telecommunications masts in the future, reducing the need for such installations.

2.2.3 The NPPF states the following specifically in relation to advertisement control at paragraph 67:

'Poorly placed advertisements can have a negative impact on the appearance of the built and natural environment. Control over outdoor advertisements should be efficient, effective and simple in concept and operation. Only those advertisements which will clearly have an appreciable impact on a building or on their surroundings should be subject to the local planning authority's detailed assessment. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.'

2.2.4 The siting of each Link unit has been chosen, in part, to ensure that there is no adverse effect on amenity or public safety caused by the advertisement element. See siting criteria at section 4.

2.3 London Plan Policy

2.3.1 Policy 4.11 of the London Plan 2015 states the following in support of the development of digital communications and connectivity:

'POLICY 4.11 ENCOURAGING A CONNECTED ECONOMY

Strategic

A – The Mayor and the GLA Group will, and all other strategic agencies should:

- a) facilitate the provision and delivery of the information and communications technology (ICT) infrastructure a modern and developing economy needs, particularly to ensure: adequate and suitable network connectivity across London (including well designed and located street-based apparatus); data centre capability; suitable electrical power supplies and security and resilience; and affordable, competitive connectivity meeting the needs of small and larger enterprises and individuals*
- b) support the use of information and communications technology to enable easy and rapid access to information and services and support ways of working that deliver wider planning, sustainability and quality of life benefits.'*

2.3.2 LinkUK would make a significant contribution toward the aims of Policy 4.11, particularly in advancing '*suitable network connectivity across London (including well designed and located street-based apparatus)*' as well as ensuring '*affordable, competitive connectivity meeting the needs of small and larger enterprises and individuals*'. The network would also '*support the use of information and communications technology to enable easy and rapid access to information and services*' via Wi-Fi, in the public realm, and via a dedicated Camden Council app on the tablet.

2.4 Camden Digital Strategy and the Camden Plan (Core Strategy)

2.4.1 The Camden Digital Strategy sets out an active digital strategy for Camden to address the strategic objectives of the Camden Plan:

It is considered that LinkUK would support the Camden Digital Strategy in the following ways:

- Developing new solutions with partners to reduce inequality – All services on the Link unit are free, opening up the opportunities of digital connectivity to all residents and visitors equally.
- Creating the conditions for and harnessing the benefits of economic growth – The free-to-all services of the unit are funded by advertising revenue, providing a public benefit as well as economic benefit to the service provider.
- Investing in our communities to ensure sustainable neighbourhoods – The investment provided by LinkUK will directly benefit the communities that it covers, both in terms of the services provided and the visual improvements to the local amenity through upgrading to the new modern Links and reducing the number of existing, traditional phone boxes.

2.4.2 There are additional benefits applicable to Camden, as called for in the Camden Digital Strategy. This sets out that:

“Camden wants to realise how digital technology and Big Data can be a way to save money and improve services through co-production, collaboration, and challenge by residents and businesses.”

To that end, Links can help by:

- Providing opportunity to get closer to communities and for residents to feel connected to the Council – The Links will provide residents access to council and other essential services.
- Supporting the delivery of consultation by the Council – There is the potential for innovative access to decision-making and to reach seldom-heard groups.
- Helping to make Camden a place where people feel safe - the Links will offer 24/7

emergency services via a button on the unit, as well as a display network on which to share key information in the event of an emergency or disaster.

2.4.3 Also relevant is Core Strategy Policy CS5, which seeks to ensure that the impacts of growth are appropriately managed to meet the needs of Camden’s population and contribute to the borough’s London-wide role. It is considered that the LinkUK Network in Camden would make an important contribution to the borough’s London-wide role.

2.5 Camden Development Policies 2010-2025

2.5.1 The following Camden Development Policies are considered relevant:

- DP24 Securing high quality design
- DP25 Conserving Camden’s heritage
- DP29 Improving access

2.5.2 The applicable parts of each policy are detailed below:

2.5.3 DP24 Securing high quality design

‘The Council will require all developments, including alterations and extensions to existing buildings, to be of the highest standard of design and will expect developments to consider:

a) character, setting, context and the form and scale of neighbouring buildings;

...

c) the quality of materials to be used;

...

i) accessibility.’

2.5.4 The unit’s design is detailed at section 3 below. The award-winning design was created by urban design firm Antenna, led by Masamichi Ugadawa whose work is displayed in the Museum of Modern Art in New York. It is appropriate for the unit’s function in terms of scale, form and quality of materials. The footprint is considerably smaller than the telephone kiosks that would be replaced, which would improve pedestrian movement and, consequently, accessibility. The appropriateness of the design to its surroundings, with regard to character, setting and context, is dealt with through the siting of the units in accordance with the siting criteria detailed at section 4; e.g. units are only proposed in areas of appropriate character, setting and context.

2.5.5 DP25 – Conserving Camden’s heritage

‘Conservation areas

In order to maintain the character of Camden’s conservation areas, the Council will:

a) take account of conservation area statements, appraisals and management plans when assessing applications within conservation areas;

b) only permit development within conservation areas that preserves and enhances the character and appearance of the area;

...

d) not permit development outside of a conservation area that causes harm to the character and appearance of that conservation area; and

...

Listed buildings

To preserve or enhance the borough’s listed buildings, the Council will:

...

g) not permit development that it considers would cause harm to the setting of a listed

building.

...

Other heritage assets

The Council will seek to protect other heritage assets including Parks and Gardens of Special Historic Interest and London Squares.'

2.5.6 The requirements of policy DP25 have been addressed through the siting criteria detailed in section 4, below. Where located within conservation areas or in proximity to listed buildings or other heritage assets, care has been taken to ensure that the units do not distract from or otherwise adversely affect these assets. The removal of existing telephone kiosks has the potential to enhance the setting of heritage assets, particularly where several are removed at one location.

2.5.7 DP29 – Improving access

'The Council will seek to promote fair access and remove the barriers that prevent people from accessing facilities and opportunities. We will:

a) expect all buildings and places meet the highest practicable standards of access and inclusion;

b) require buildings and spaces that the public may use to be designed to be as accessible as possible;

c) expect facilities to be located in the most accessible parts of the borough;

...'

2.5.8 The Link unit has been designed to be accessible to users of various levels of ability and disability as detailed in section 3. Accessibility considerations have also informed the siting criteria for each unit, including the maintaining of appropriate pavement widths.

2.6 Policy Summary

2.6.1 The Siting Criteria as detailed at Section 4 include the following local and national policy requirements:

- Character of the local street scene/context and amenity (NPPF para. 67, DP24, DP25);
- Reduction of street clutter (DP24, DP25);
- Public safety, visibility splays and footway widths (NPPF para. 67, DP29);
- Protection of heritage assets (NPPF para. 67, DP25)
- Provision of high quality telecommunications infrastructure (NPPF para 42-43, London Plan Policy 4.11)
- Accessibility (DP24, DP29, CS5);

2.6.2 Details of the unit design are given at Section 3, including information on the following local requirements:

- Quality of design and materials (DP24);
- Accessibility (DP24, DP29, CS5);
- Reducing anti-social behaviour through good quality design (DP24)

03

Appearance / Unit Design

3.1 The structural design and appearance of the Link unit is centred on a desire for integration with the urban environment and ease of use for users.



Figure 2: Link unit

3.2 Uniformity of the Link units across the entire network is key to the recognisability and legibility of the network. As such, the design is intentionally neutral so as to blend into multiple urban environments and has a vertical emphasis to reduce the footprint on the ground; an important consideration in busy urban environments. The materials used are of a high quality durable nature and include the following features:

- Robust aluminium superstructure
- Ribbed panelling to eliminate flat surfaces prone to vandalism and litter
- Graffiti and acid etch resistant paint
- Strike resistant and shatterproof display screens and tablet glass
- Weather resistant exterior components and internal contingency water channelling paths
- Active filtered air knife cooling system
- Design equipped to withstand wind and seismic loads during worst case exposure categories
- Engineering resistant to vehicle impact loads, tested for impact loads at vehicle speeds of up to 15mph

3.3 The overall dimensions are 787mm wide by 280mm deep at ground level, and 889mm wide by 280mm at the top of the unit. The narrower base reduces the street footprint further and gives a slender, elegant appearance. The total height of the unit is 2895.6mm.

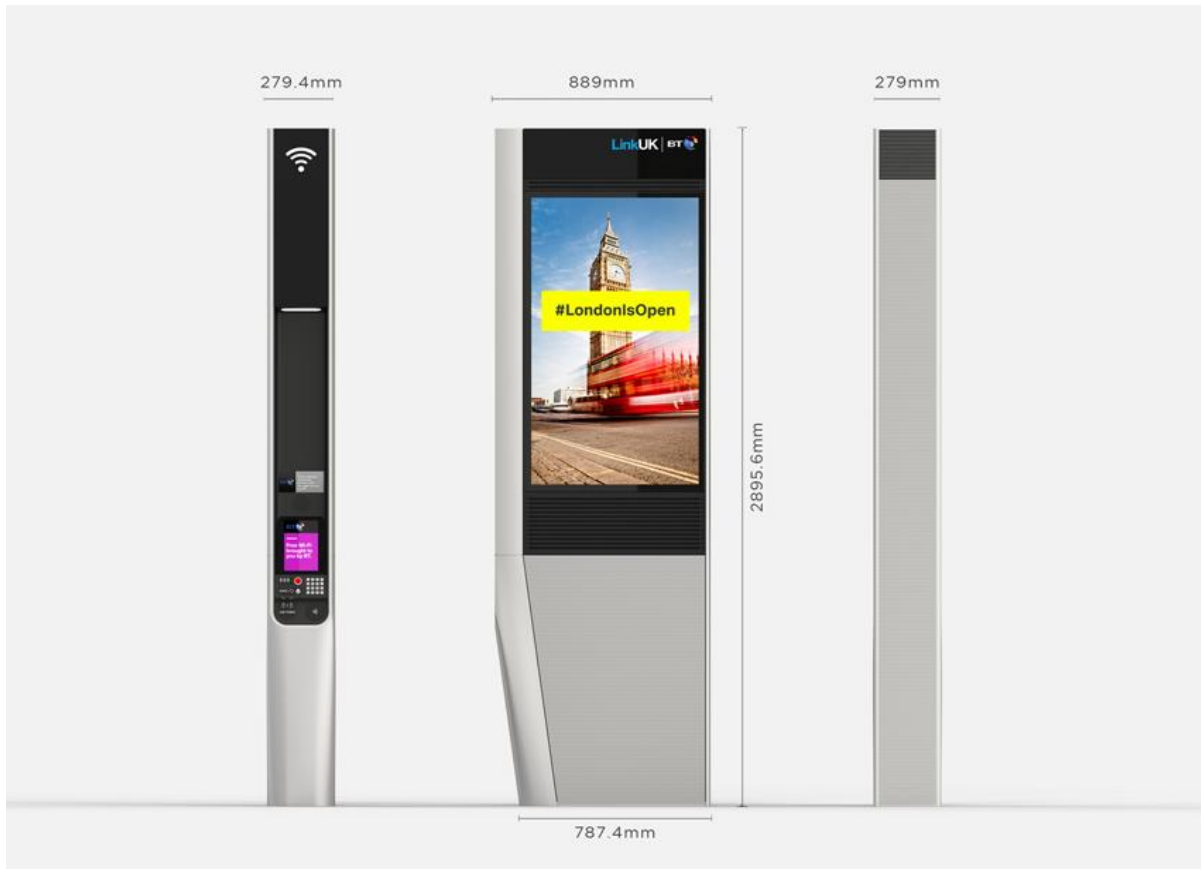


Figure 3: Link unit overall dimensions

3.4 The scale of the unit is in keeping with that of common London street furniture; see Figure 4. The footprint of the Link unit is significantly smaller than the telephone kiosk options currently used by BT due to the significantly reduced depth. The width is also less than all other options and significantly less than the most recent 'ST6' unit option.

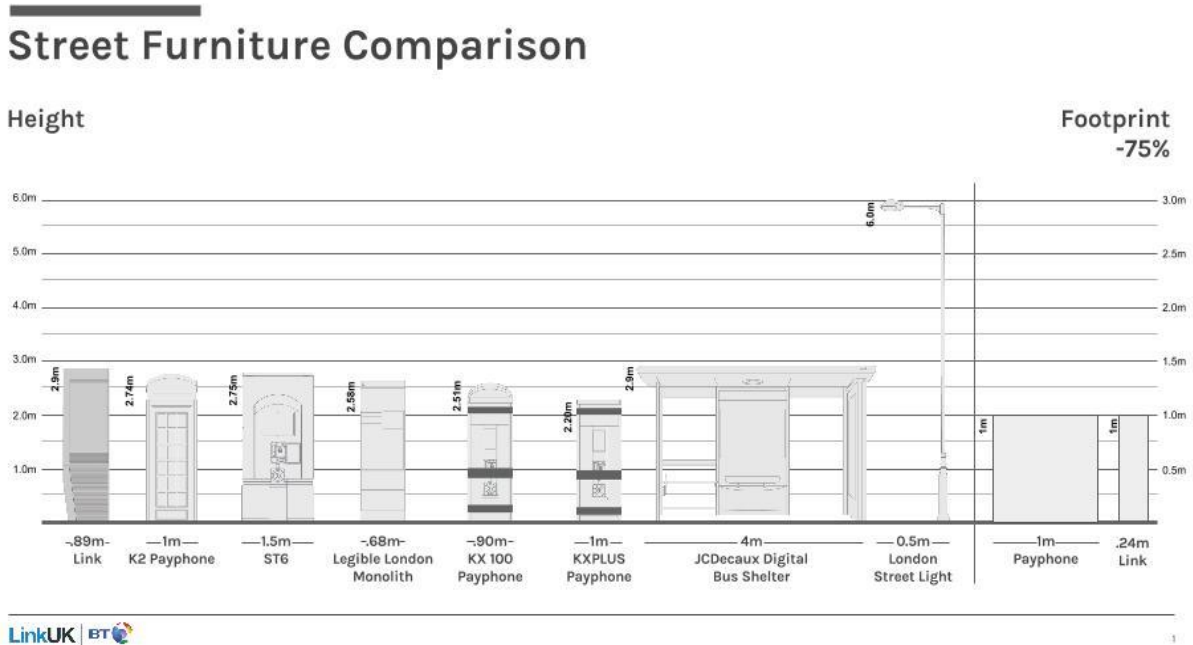


Figure 4: Link Unit scale comparison with common London street features

3.5 The unit has been designed with accessibility at the forefront for users of various abilities and physical capabilities. The user interface is simple and intuitive, creating an uncluttered appearance; see Figure 5.



Figure 5: Link user interface

3.6 The interface includes the following features for maximum accessibility:

- Touchscreen tablet interface is placed at 1220mm to accommodate wheelchair users
- Tactile keypad
- Emergency button
- High-contrast, large type labels
- Braille and audio instructions available

3.7 The unit is considered to be at the forefront of accessible design for public telecommunications interfaces.

3.8 The advertising and information display screens on either side of the unit are high resolution and controlled remotely from a central server. The content and luminance levels would be restricted to comply with Transport for London's *Guidance for Digital Roadside Advertising and Proposed Best Practice – 2013*. See attached proposed schedule of operating conditions.

04

Unit Siting / Siting Justification (Site Specific)

4.1 The siting criteria used to site each Link unit in the network across London include Planning and Urban Design criteria relating to visual character of the street scene, proximity to sensitive heritage assets, overall scale of setting, pavement width, and surrounding land uses and social context. These criteria have been adjusted where necessary on a site by site basis to account for local policy requirements. Further criteria include Wi-Fi network coverage, proximity to existing communications, infrastructure, pedestrian flows, population coverage, and potential advertising audience.

4.2 Justification of the siting of the Link unit at **Grays Inn (OS No 05 Argos) WC1X 8PH** is detailed below against the local policy requirements:

4.3 Character of the local street scene/context and amenity (NPPF para. 67, DP24, DP25) – The site is situated on Grays Inn Road outside n. 05 (Argos) in a predominantly commercial setting. The Link unit is considered to be in keeping with the scale and character of the setting. It would replace existing BT kiosks in the wider vicinity on Grays Inn Road and High Holborn as detailed in

the attached Kiosk Removals document. The proposal was the subject of a pre-application assessment on site with Planning Officers Kristina Smith and Nora-Andreea Constantinescu and Conservation Officer Sarah Freeman and an application was invited.

4.4 Reduction of street clutter (DP24, DP25) – The proposed Link unit has a smaller footprint than the KX100 telephone kiosks that would be replaced and it is proposed to remove 4no. kiosks as part of the application. The proposal would therefore significantly reduce street clutter.

4.5 Public safety, visibility splays and footway widths (NPPF para. 67, DP29) – The proposal was the subject of a pre-application assessment on site with Steve Cardno (Acting Head of Transport) who advised that the proposal appeared to cause no transport related issues based on the available information. The position of the unit would not interrupt any highway safety visibility splays or sightlines and the existing footway width would remain adequate. The advertising screens would operate within TfL safety guidelines. There are no other apparent public safety issues.

4.6 Protection of heritage assets (NPPF para. 67, DP25) – The site is not within a Conservation Area and no Listed Building would be affected.

4.7 Provision of high quality telecommunications infrastructure (NPPF para 42-43, London Plan Policy 4.11) – The Link unit would provide high quality telecommunications facilities as set out above. The proposed location is accessible to a large number of workers, tourists and residents as part of the wider LinkUK network.

4.8 Accessibility (DP24, DP29, CS5) – The Link unit is accessibly designed as set out above. The location has sufficient footway widths and is appropriately positioned to allow maximum accessibility to users.

05

Summary

5.1 LinkUK has the potential to significantly enhance the provision of local community communications facilities and services (Sec. 5 of NPPF and London Plan Policy 4.11).

5.2 The unit is of a high quality, accessible design that would be a marked improvement over the existing kiosks (DP24, DP29, CS5).

5.3 The unit would be located within an appropriate context (NPPF para. 67, DP24, DP25); it would reduce street clutter (DP24, DP25); it would maintain sufficient footway widths and visibility splays (NPPF para. 67, DP29); would not adversely affect heritage assets (NPPF para. 67, DP25); and, would not otherwise adversely affect amenity or public safety.

5.4 Therefore, the proposed siting and appearance of the unit are considered to be accordant with the relevant policy framework and the unit would not adversely affect amenity or public safety. As such, it is considered that planning permission and express advertisement consent should be granted.