

Mono Site Ref: CAM003



Head of Planning
Planning Solutions Team
Planning and Regenerations
Culture & Environment Directorate
London Borough of Camden
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29 July 2021

Dear Planning,

BT STREET HUB PROJECT
FULL PLANNING AND ADVERTISING APPLICATION
CAM003 – PAVEMENT O/S HSBC, 39 TOTTENHAM COURT RD, LONDON W1T 2AR

We write on behalf of our client, BT, following pre-application discussions for the installation of a BT Street Hub unit with digital adverts at the entitled site as well associated BT kiosk removals. This stems from the rollout of now existing InLinks across the Borough and previous applications submitted in 2018 along Tottenham Court Road for InLinks that were not determined by the LPA hence after ongoing discussions were withdrawn in June 2021. The incumbent supplier, InLinkUK, went into administration and are no longer able to supply these types of units to BT, so this product is no longer available. Since then, BT have been working over on a new and improved unit, the BT Street Hub, that they are keen to rollout along Tottenham Court Road.

To recap, the InLinkUK service was first launched in 2017 and since then 494 InLink structures were rolled out in 23 cities. These first-generation units offer 1Gbps free public Wi-Fi, free UK calls, USB charging, included 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 help fund the units, but the screens can also show local content free of charge.

It is appreciated that since 2018 when the InLink applications were submitted the public realm along Tottenham Court Road has in sections been redeveloped, hence the area has been revisited and BT are now applying for full planning permission and advertisement consent for their new unit, BT Street Hub, at the entitled site.

BT Street Hub Project

BT is continuing to move forward with its public benefit offerings in which Street Hubs will provide a sleek and modern answer to the demands of a digitally connected society. BT Street Hub has all the existing features of the previous InLink unit but has better Wi-Fi range, 4G 5G small cells, environmental sensors and insight counting. In particular the addition of the small cells to Street Hubs is very much in line with current UK Government's guidance on communications infrastructure and the National Infrastructure Strategy.



The Street Hub 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, however 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. Due to the increased functionality of the new Street Hub, a slightly larger structure than the one that was originally proposed in the InLink unit is required. We have appended some imagery of the new structure, which is 34cm longer than the original unit, but only 7cm wider and 8.5cm taller.

Further to the withdrawn applications, there was a Teams call meeting on the 21st June 2021 with BT, their agents Mono and the Local Planning Authority to introduce the BT Street Hub project and discuss a way forward for Tottenham Court Road. This was then followed up with an email on the 30th June 2021 sent by BT to the LPA highlighting 10 sites with a suggestion to take a collaborative approach by visiting the said sites. The LPA proved unresponsive so moving forward, this is an application for full planning permission and consent to display advertisements, relating to the installation of 1no. BT Street Hub at the entitled address and the associated removal of 2no. BT phone boxes.

This submission comprises of the following documents:

- Site specific Planning and Design and Access statement;
- 1App forms and certificates generated by the Planning Portal.
- The prescribed fee of £924 paid directly to the Council via the Planning Portal.
- Drawings including location plan map, proposed site plan, existing and proposed elevations, as well as a photomontage;
- BT Street Hub Product Statement giving full details of the proposed structure;
- BT Anti-Social Behaviour Management Plan;
- BT Street Hub Renders;
- 'The Institute of Lighting Professional's 'Professional Lighting Guide 05: The Brightness of Illuminated Advertisements' 2015 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 any associated BT phone boxes found immediately adjacent to try and encompass the removals as well. BT are a statutory undertaker on adopted highways controlled land, so we have notified the Highways Department and where applicable any registered owner(s) as part of our planning submission.

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



Kwasi Boama, BA (Hons)
Planner
Mono Consultants



For and on behalf of BT as a duly authorised agent

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Planning, Design and Access Statement

Our Ref.	CAM003
Lat/Long	51.51889, -0.13276
Project Type	BT Street Hub
Conservation Area	Not within Conservation Area
Statutory Listed Buildings in vicinity	THE RISING SUN PUBLIC HOUSE, 46, TOTTENHAM COURT ROAD Grade: II List Entry Number: 1379019

As part of our smart city approach to connecting and improving local streets, Full Planning Permission and Express Advertisement Consent is sought for the installation of one BT Street Hub and removal of two associated BT payphone kiosks.

Proposed Install (Site Location Photo)
Pavement o/s 39 Tottenham Court Rd, London W1T 2AR

A street-level photograph of Tottenham Court Road in London. The view is from a sidewalk looking down the road. On the left, there are trees and a red BT payphone kiosk. In the center, a black traffic light pole stands with a green light. On the right, a red double-decker bus is visible, and a cyclist in a blue and white checkered shirt is riding past. The road is paved with grey stones, and buildings line the background under a clear sky.

Proposed Removals

O/S 39 - 45 Tottenham Court Road



PLANNING LEGISLATION & POLICY

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.

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 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. An update to the UK's Digital Strategy has unfortunately been postponed due to the Covid-19 pandemic but is now due to be published in 2021 and drafts indicate continues to promote the government's policy of improved digital connectivity.

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.

National Planning Policy Framework, 2021

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied and is a material consideration for both the Full Planning applications and the Express Advertisement Consent applications. The NPPF supports the provision and promotion of sustainable transport at section 9. These relevant policies are set out below:

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

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

The NPPF supports the provision of high-quality communications infrastructure at section 10. These relevant policies are set out below:

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

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

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

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

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

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

When taking into account the air monitoring system that is built into the Street Hub unit it is considered that the following is applicable:

Paragraph 186 - Opportunities to improve air quality or mitigate impacts should be identified, such as through green infrastructure provision and enhancement.

The London Plan, 2021

Where applicable it is considered that the following London Plan policies are applicable and in accordance with this case –

SD6 - Town centres and high streets
D5 - Inclusive design
D8 - Public realm
D11 - Safety, security and resilience to emergency
S1 - Developing London's social infrastructure
E1 - Visitor infrastructure
HC6 - Supporting the night-time economy
SI 1 - Improving air quality
SI 6 - Digital connectivity infrastructure

Camden Local Plan 2017

This case has been assessed against the following Local Plan policies: -

Policy A1 - Managing the impact of development
Policy C5 - Safety and Security
Policy C6 - Access
Policy D1 - Design
Policy D2 - Heritage
Policy D4 - Advertisements
Policy E1 - Economic development
Policy G1 - Delivery and location of growth
Policy T1 - Prioritising walking, cycling and public transport

Planning History to the Site

Proposed location is a progression of the recently withdrawn InLink Application REF 2018/4250/P & 2018/4476/A outside HSBC on Tottenham Court Road. This site is located on the part of Tottenham Court Road between Percy Street to the south and Windmill Street to the north.

It is also noted that the associated kiosk removals assigned to this Street Hub case is currently subject to a Planning Contravention Notice.

Street Hub Strategy

Matters considered in the original site identification have been revisited in which there is a preference on locations with wide pavements, and taking into account a Street Hub unit's relationship with existing street furniture, so as to avoid undue proliferation and clutter wherever possible. It should be recognised that BT's legacy estate of payphones has grown up organically over the years, in which their whereabouts can now sit in environments that have changed dramatically around them amidst an ever-evolving society with changing connectivity demands. BT has a universal service obligation with Ofcom to provide a street level phone service, so the selection process of associated kiosks to be removed has to cater for this, in which although there was an appreciation by all that the use of phone boxes has declined since kiosks were first conceived, obviously WI-FI and mobile connectivity has increased massively. In this respect Street Hubs are different to InLinks as all units have inbuilt small cells.

Also, it is recognised that air quality is an important issue that needs to be tackled. In this respect it worth noting that unlike the InLinks, all Street Hubs have a built-in air monitoring system. In this respect the units strategic siting along Tottenham Court Road, means the authority can use this data to help monitor air quality. Furthermore all Street Hub can collect meaningful insight data such as counting pedestrian, bike and vehicle numbers, measuring traffic congestion, as well as other environmental factors like sound and light.

Taking all these features into account BT strategy in their rollout of Street Hubs is to build a network of sites that where best possible creates sequences, where the user experience and environmental data meets their needs.

Siting Justification against Planning Policy

The introduction of any new 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, the change in form of something that has an established presence on-site like a telephone kiosk, 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 improve the street scene as part of a smart city approach that will meet the communication needs of today's society.

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 BT payphones to be removed and the visual context of that particular street scene where the new Street Hub is proposed. With regards its associated advertisement screens, thought has been given to its immediate environment 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 assessing 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 any visual impact of a new Street Hub, creates significant harm as to outweigh the array of public benefits Street Hub will bring to the area.

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

Siting

In this instance the proposed Street Hub has been progressed as a direction conversion of suited BT kiosks 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.

Also previously highlighted at a strategic level there are two BT call boxes removed for every new Street Hub. The removal of these existing call boxes will declutter the street scene, in which when comparing the footprint of existing call boxes to be removed with a proposed Street Hub, it will free up a lot more useable space.

Tottenham Court Road is a busy highway for both vehicular and pedestrian traffic. The street scene context immediate to the proposed Street Hub site comprises a mix of uses including shops, restaurants, take-aways and supermarkets. In the immediate vicinity of the proposed Street Hub site there are existing street furniture items including bus shelters containing advertisement, freestanding advertisements, road signage, bike racks, streetlights, and litter bins. There are also stands of street trees within the immediate vicinity of the application site. Viewed within this street scene context, it is considered that the siting of the proposed Street Hub is appropriate.

It is noted that other forms of advertisements have been accepted in the vicinity of the proposed Street Hub. There is a Clear Channel freestanding Advertisement panel on the kerbside to the north-west of the site, which was granted permission under LPA Ref 2018/0517/A. There also is a bus shelter integral with a double-sided JCDecaux illumination advertisement to the south-east of the site, which was approved under LPA Ref 2016/3880/A.

It is also noted that there are three JCDecaux freestanding advertisement applications that are currently live on Tottenham Court Road outside no.29 (2021/3106/A and 2021/2105/P), no.81 (2021/3104/A and 2021/2103/P), and no.191 (2021/3108/A and 2021/2111/P). The closest of these to this proposal subject to this application is around 70 metre to the south.

Despite its modern appearance, the Street Hub unit is of a very simple, unfussy design which we believe is a significant visual improvement from that of the existing situation of old kiosks. The siting of the proposed Street Hub will not appear incongruous within this part of Camden given the modern frontages and street furniture found along this stretch of Tottenham Court Road.

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

Appearance

The proposed 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 of Tottenham Court Road for the Council, 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 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. It is considered that the appearance of the new structure will not be harmful to the wider street scene especially given the look 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 Street Hub, in which any visual impact will be outweighed by the array of public benefit features that the new unit has inbuilt.

The structure will be set within a generally commercial setting and busy stretch of road that is dominated by vehicular and pedestrian movements, hence it is well-lit throughout the day. While it is accepted that the 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 this stretch of road which is well lit by streetlights, window displays, other freestanding advertisements and bus shelters containing advertisement panels. In this context, the Street Hub design would not appear detrimental to the visual amenity of Tottenham Court Road.

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 11700mm. The total width of the Street Hub is 1236mm, tapering down to a footprint width of 1201mm on the pavement. In this case, the Street Hub would be located at a distance of 4500mm off the kerb instead of 500mm, so that it does not impact on the pedestrian crossing, the remaining footway of 1300mm is clear for the safe passing of pedestrians.

It is of note that the structure is only 350mm in width and is a lot slimmer than a conventional kiosk, so there will be a very minor narrowing of the footway here when passing the Street Hub.

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 due to the commercial nature of this street. As previously discussed, it is believed that the siting and appearance of the 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 Street Hub and the display of digital advertisements on its sides will allow for the continued safe movements of motorists and pedestrians, and indeed there is significant space for pedestrians to pass safely as noted above. 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 Street Hub is to be located and the orientation of its digital screens in relation to the road would not cause unacceptable interference with nearby road signs and/or navigational lights. Viewed within the street scene setting, the 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.

With regards 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 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 proposed usage for the screens has been set in accordance with Transport for London's (TfL) policy document - Guidance for Digital Roadside Advertising and Proposed Best Practice. 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 are existing traditional advertisement on similar sections of the respective roads in many cases.

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

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

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:

- 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.*
- Pavement surrounding the Street Hub shall be made good to the same condition as the adjacent land.*
- 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'.*
- The digital display screens shall not display any moving, or apparently moving, images (including animation, flashing, scrolling three dimensional, intermittent or video elements).*
- The minimum display time for each piece of content on the digital display screens shall be 10 seconds.*
- 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.*
- No content on the digital display screens shall resemble traffic signs, as defined in section 64 of the Road Traffic Regulation Act 1984.*

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

Conclusion

Street Hubs have the potential to significantly enhance the public realm and provide public benefits to the local area. 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 and a smart city vision. It

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will deliver social, economic, and environmental benefits by providing a suite of essential urban services, including free ultrafast Wi-Fi, mobile small cells, monitoring sensors and public messaging capabilities to the benefit of the Council, residents, businesses, and visitors in this area.

The proposed Street Hubs structures are of a high quality and accessible design that would be a significant improvement when compared to the existing payphones that are to be replaced. We consider the proposed Street Hub and its screens to be appropriately sited and in doing so will reduce street clutter and improve available footway widths in the locality. It will not significantly harm heritage assets or adversely affect the amenity of the area or public safety.

We believe this statement and the supporting document included as part of this submission, demonstrated that the Street Hub proposal is in accordance with national policy set out in the NPPF and local development plan policies. There are multiple factors favouring this proposal in which clearly the public benefits outweigh any less than substantial issues, hence we would hope that this application can be supported by your Council.