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Wrexham County Borough Council
Planning Service
16 Lord Street
Wrexham
LL11 1LG

3-WRE002

10th September 2025

Dear Planning,

BT Street Hub Project
Full Planning and Advertising Application
3-WRE002 Pavement o/s Natwest, 33 Lord Street, Wrexham, LL11 1LP (E 333425, N 350449)

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

InLink Project

The InLink UK service was first launched in 2017 and since then 494 InLink structures were rolled out in 23 cities. These units offer 1Gbps free public Wi-Fi, free UK calls, USB charging, an emergency services button and a range of other digital services for those in the vicinity. HD displays on the sides are used to carry advertising, which helped to fund the units, but the screens can also show local content free of charge. After the suppliers of the InLinks went into administration in 2019 and are no longer able to supply units to BT, this product is no longer available. Since then, BT have been working on a new and improved unit, the BT Street Hub, that they are keen to rollout in Wrexham and all major UK cities.

BT Street Hub Project

BT is continuing to move forward with public connectivity and benefits in which Street Hubs will provide a sleek and modern answer to the demands of a digitally connected society. BT Street Hubs include the ability to house 5G small cells which is very much in line with current UK Government's guidance on communications infrastructure and the National Infrastructure Strategy. This is echoed in the Government's commitment towards telecommunications deployment which has been strengthened since the conception of InLinks and NPPF in particular, confirms that, '*Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being.*

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

Since the rollout of InLinks, there has been increased focus on green initiatives and environmental monitoring. Street Hubs take this into account and can house sensors that count pedestrian, cyclist and vehicle movements as well as monitor air, sound and light. This free information and will help the planning system actively manage patterns of growth in support of national air quality objectives and the Governments ten-point plan for a Green Industrial Revolution. It will be a useful source of real-time data in the delivery of the Council's own green agenda, travel plans and can be used to present a business case for carbon offset credit.

Overall, Street Hubs will help future-proof the high street making them smarter, safer, and more sustainable. Investment in the high street is at an all-time low, but that has not slowed BT down as they look to ramp up their rollout of new Street Hubs across the UK. They are continuing their commitment to invest and improve in the high street, with one Street Hub at a time, and with that decluttering these environments with the associated removal of existing BT phone boxes.

This submission comprises of the following documents:

- Site specific Planning and Design & Access statement;
- 1App forms and certificates generated by the Planning Portal;
- The prescribed fee of £1,156 (plus VAT) paid directly to the Council via the Planning Portal;
- Drawings including location plan map, proposed site plan, existing and proposed elevations;
- BT Street Hub Product Statement giving full details of the proposed structure;
- BT Anti-Social Behaviour Management Plan;
- 'The Institute of Lighting Professional's 'Professional Lighting Guide 05: The Brightness of Illuminated Advertisements' 2023 for your reference;
- International Commission on Non-Ionizing Radiation Protection (ICNIRP) certificate.

Where possible, we have specifically drawn the red line around the proposed BT Street Hub and the associated BT phone boxes found immediately adjacent to try and encompass the removals as well.

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

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

Yours faithfully,

[redacted]
Lewis Baldwin MRTPI
Senior Acquisition & Planning Surveyor at Mitie
[redacted]

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Planning, Design and Access Statement

Our Ref.'s	**3-WRE002**
Address	**Pavement o/s Natwest, 33 Lord Street, Wrexham, LL11 1LP**
Lat/ Long	**53.047141, -2.994543**
Site Type	**Direct Conversion**

As part of our collaborative approach to connecting and improving local streets, Full Planning Permission and Express Advertisement Consent is sought for the installation of 1no. BT Street Hub and removal of associated BT payphone.

Photomontage of Proposed Installation



Proposed Kiosk Removals

Tel: 01978361043
Address: Pavement o/s Natwest, 33 Lord Street, Wrexham, LL11 1LP

UK Digital Strategy

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

National Infrastructure Strategy

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

The Town and Country Planning (Control of Advertisements) Regulations 2017

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) Regulations 2017. Applications for full planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise (Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the 1990 Act). Under the advertisement Regulations, Express Consent is required for the advertisement element, notably the 2no digital screens on each side of the Street Hub. As per regulation 3 of the Regulations, applications for Express Advertisement Consent must be determined in the interests of amenity and public safety, considering (a) the provisions of the development plan, so far as they are material, and (b) any other relevant factors.

The Town and Country Planning (Control of Advertisements) Regulations 1992 state the following specifically in relation to advertisement control:

PART I - General

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

3. (1) A local planning authority shall exercise its powers under these Regulations in the interests of amenity and public safety, taking into account;
(a) the provisions of the development plan, so far as they are material; and
(b) any other relevant factors.
(2) Without prejudice to the generality of paragraph (1)(b);
(a) factors relevant to amenity include the general characteristics of the locality, including the presence of any feature of historic, architectural, cultural or similar interest;
(b) factors relevant to public safety include;
(i) the safety of persons using any highway, railway, waterway, dock, harbour or aerodrome (civil or military);
(ii) whether the display of the advertisement in question is likely to obscure, or hinder the ready interpretation of, any traffic sign, railway signal or aid to navigation by water or air;

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

National Planning Guidance

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

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

Planning Policy Wales 12 (2024)

Planning Policy Wales 12 is the leading planning policy document for Wales and guides development throughout the country. The primary objective of the PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural wellbeing of Wales.

The PPW outlines the Government's approach is to continue to strongly support communications infrastructure. The PPW remains very supportive of high-quality communications. Paragraph 5.2.1 states that affordable, secure, electronic communications infrastructure is essential to people and business.

The PPW continues to support the expansion of communications infrastructure and also adds context around the rollout of 5G infrastructure in Paragraph 5.2.11 which states that new technologies such as 5G will result in the densification of mobile infrastructure particularly in urban areas which could require more small cell sites in street settings. The planning system will need to respond positively to this evolution in technology whilst being mindful of the impacts on amenity and the historic environment.

It is considered that BT Street Hub provides a clear pathway towards achieving this, allowing for 5G via small cells which are built into the unit which serves a wider purpose within the street scene.

Code of Best Practice on Mobile Phone Network Development for Wales (2021)

The Code of Best Practice on Mobile Phone Network Development for Wales expands on the previous document published in 2003 and recognises the exponential increase in the requirement for mobile communications technology in the modern day. It reiterates the need for the expansion of mobile communications networks and outlines how the planning system will be placed to support this growth.

As with PPW, the Code of Practice outlines the rollout of 5G and its impacts for Wales' street scenes, stating that the introduction of 5G will create a need for more apparatus. 5G will operate across multiple radio spectrums and the antenna systems will continue to provide 2G, 3G and 4G services that demand lower speeds. Consequently, there will be a requirement for greater numbers of antennas than before, as well as new radio equipment cabinets and taller structures. Furthermore, they will often be larger and so greater in appearance. Furthermore, it states that in densely populated areas, there will be a higher demand for such services, with an increase in the use of mobile phones and other devices which require high use of data.

In terms of a direct relation to the planning system, the Code of Practice states that where appropriate planning authorities and mobile operators should work together to find suitable design solutions to minimise the visual impact of new apparatus required for 5G at existing sites. The Code of Practice states the Local Authorities should seek to place emphasis on simple, unfussy designs, with attention given to finishes and colouration that might help minimise appearance.

As with PPW, it is considered that Street Hub provides a clear response to the guidance set out in the Code of Practice. Street Hub provides a modern solution with such infrastructure provided as part of a multi-purpose unit in which the design is commonplace throughout the UK street scenes.

Local Planning Policy

Wrexham Unitary Development Plan 1996-2011 (adopted February 2005)

The Wrexham Unitary Development Plan addresses the Borough's role in creating attractive places with a high-quality public realm. It is considered that the following policies are applicable and in accordance with this case:

- Policy PS12: Renewable Energy
- Policy GDP1: Development Objectives
- Policy S1: Shopping Streets in Wrexham Town Centre
- Policy CLF8: Telecommunications

Planning Guidance Note 01 – Advertisements

The planning guidance note on advertisements seeks to guide development relating to advertising in Wrexham and is an adopted planning document which applications are judged against.

The guidance note outlines that controls on advertisements requires applications to be judged in terms of amenity and road safety while looking to avoid the impacts that poorly placed signage has on visual amenity. However, the Council does recognise that appropriately placed advertisements can add colour and interest to otherwise drab environments.

On replacement signage, the guidance states that the Council will expect applicants to agree to a reduction or rationalisation of existing signs to avoid advertisement clutter.

On freestanding advertising more generally, the guidance states that advertisement modules may be appropriate in adding visual interest to the street scene.

Pre-application advice

A formal pre-application consultation request was sent to Wrexham County Borough Council on 08/09/2025 which introduced the BT Street Hub project and sought to agree to a bespoke fee for paid pre-app advice given the unique nature of project and multiple potential sites identified across the authority.

The Council responded and confirmed that pre-application advice would be subject to a fee and timescales.

Taking this into account, the decision was made to progress the site without pre-application advice in an effort to move the project as efficiently as possible. However, BT are keen to ensure that communication channels remain open and are open to discussions about the site over the course of the application in order to address any foreseen issues.

Planning History

An assessment of the planning history of the site and its locality has been undertaken in which the following planning applications have been identified as being relevant to the determination of this planning application:

- LPA Ref. P/2025/0225
- Address: LAND OUTSIDE LADBROKES, LORD STREET, WREXHAM, LL11 1LF
- Proposal: INSTALLATION OF DIGITAL COMMUNICATIONS KIOSK/DEFIBRILLATOR
- Decision: Granted

- LPA Ref. P/2025/0226
- Address: LAND OUTSIDE 16, LORD STREET, WREXHAM, LL11 1LG
- Proposal: INSTALLATION OF DIGITAL COMMUNICATIONS KIOSK/DEFIBRILLATOR
- Decision: Granted

It is considered that recent approvals for freestanding kiosks with integrated advertising along Lord Street sets a clear precedent for the installation of Street Hub in this case. In this context, Street Hub is considered appropriate in terms of functionality and siting and appearance when viewed as part of the street scene.

Direct Conversion

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

Siting Justification against Planning Policy

At the conception stage, we have tried to focus on pursuing direct conversions of existing kiosks wherever practicable. Also, we have looked for locations with wide pavements, and where a sites relationship with existing street furniture avoids undue proliferation of clutter. It should be recognised that BT's legacy estate of payphones has grown up organically over the years, in which the whereabouts of BT kiosks can sometimes sit in environments that have changed dramatically around them. In some instances, the BT Street Hub project has been seen as an opportunity to improve the pedestrian environments by removing awkward BT kiosks and repositioning the new unit to a more in keeping spot in the street scene.

It is appreciated that streets are ever-evolving environments, amidst society's changing connectivity demands. BT has a universal service obligation with Ofcom to provide a street level phone service, so the selection process of kiosks to be removed had to cater for this, however there is a recognition that the use of phone boxes has dramatically changed since kiosks were first conceived, whilst now the need for Wi-Fi and mobile coverage has increased massively. In this respect we have tried to build a sequence of Street Hub sites wherever possible, so that this can improve the user connectivity experience as they travel through an area.

Likewise, as Street Hubs can provide the Council with valuable data as each unit has environmental sensors that can monitor air, sound and light, we have tried to plan a sequence of Street Hub sites along key routes, so that the information gathered can be better analysed. This free environmental data has its own dashboard and will help the planning system actively manage patterns of growth in

support of national air quality objectives and will be a useful source of real-time data in the delivery of the Council's own green agenda. In a similar vein Street Hubs have the capability to monitor pedestrian, cyclist, and vehicle movements, hence in building a strategic network of Street Hub units it will help the Council to monitor and develop travel plans for the area.

The introduction of any form of development within a particular environment will always be, to some degree, a noticeable addition or change to those residents, businesses and regular passers-by found closest. However, it should be appreciated that the visibility of something that is new or the change in form of something that has an established presence on-site, like a telephone kiosk to a Street Hub unit, does not automatically result in an overwhelming adverse harm occurring. The starting point and fundamental principle applied by the applicant is always to replace existing BT call boxes with Street Hub units where they will be in-keeping with their existing surroundings. In this regard it is seen as an opportunity to help future proof the high street making them smarter, safer, and more sustainable.

In progressing new Street Hub sites, so far as practicable we have sought to minimise the contrast between the development itself and its immediate environment through appropriate siting and design. The siting of each Street Hub has been considered having regard to the available footpath widths, the whereabouts of the existing payphones to be removed and the visual character of that particular street scene where the new Street Hub. With regards to its associated advertisement screens, thought has been given to its immediate context and public safety in terms of pedestrian and vehicular movements. These criteria have been adjusted where necessary on a site-by-site basis to account for local context and policy requirements when reassessing the site's suitability to accommodate a new Street Hub unit.

Justification for the siting and appearance of the proposed Street Hub, has been assessed against up to date national and local planning policies and any other material considerations. Our assessment has concentrated on whether the removal of the existing BT call boxes when balanced against the replacement of new Street Hub at the application site, creates a significant visual harm as to outweigh the public benefits.

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

Siting

This proposal involves the removal of BT existing call boxes in association with 1no proposed new Street Hub. Also, as previously highlighted at a strategic level there are generally 2no BT call boxes removed with every Street Hub proposed. The removal of these existing call boxes will declutter street scenes throughout the authority and when comparing the footprint of existing call boxes to be removed and proposed Street Hub, it will declutter more pavement and so free up space.

High Street is a busy highway for both pedestrian traffic which can be described as a central commercial route for Rhyl. The street scene context immediate to the proposed BT Street Hub site is generally commercial and comprises of a number of shops and commercial services. In the immediate vicinity of the proposed BT Street Hub site there is existing street furniture including modern and busy shop frontages, road signage, streetlights, benches, bike racks, and litter bins.

Appearance

The proposed BT Street Hub unit is an advanced, modern development which has been designed following significant improvements in technology and digital content over recent years. It can promote the image of the authority as a vibrant place, and we believe it will improve the quality of the immediate streetscape for residents, businesses and visitors.

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

The appearance of the BT Street Hub unit has a vertical emphasis and by reason of its reduced footprint would give a slender more elegant form of development when compared to an existing payphone unit. The appearance of the structure is not considered to be harmful to the wider street scene, especially when taking into account the nature of the existing payphones to be removed. We believe the appearance of the area and street scene will not be compromised by the proposed new BT Street Hub.

The new structure will be set within a generally commercial setting and busy stretch of road that is dominated by pedestrian movements; hence it is well-lit throughout the day. While it is accepted that the BT Street Hub advertisements will be more visible during the hours of darkness or in dull conditions, its appearance would not be out of keeping with this stretch of road which is well lit by streetlights, window displays and headlights.

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 development site is on a wide section of pedestrianised pavement. The total width of the Street Hub is 1.236m. There is ample space on both sides of the Street Hub for the safe passage of pedestrians. It is of note that the structure is only 350mm wide, so any minor narrowing of the footway occurs for just a few centimetres.

Advertisements

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

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

It is recognised that all advertisements are intended to attract people's attention, however in this case their siting and size would not create an untoward feature within the street scene. The position where the BT Street Hub is to be located and the orientation of the advertisements in relation to the road would not cause unacceptable interference with nearby road signs and or navigational lights. Viewed within the street scene setting, the digital advertisements would be seen by passing motorists but would not create confusion nor influence the behaviour of drivers to such a degree that they would cause a hazard by reason of their presence. The proposed Street Hub would be sited away from road junctions so it would not unduly interrupt any visibility splays or sightlines. When viewed within the street scene context of the wider environment, it is not considered that the Street Hub would appear as an untoward feature to passing motorists.

Regarding pedestrian safety, the Street Hub is positioned away from the road edge on a wide section of pavement without impeding pedestrian movements as ample footway width would be retained. Allowing for the orientation of the BT Street Hub's user interface in relation to passing motorists, the public safety of those using it would not be put at risk as they would be set off the kerb edge.

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

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

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

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

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

The lighting levels noted above are within the levels set for this type and size of screen (those under 10m2) as set by the Institute of Lighting Professionals, Professional Lighting Guide 05: The Brightness of Illuminated Advertisements (2023). A copy of this document is appended for clarity.

Noise Management

As one of many features, Street Hubs provide free phone calls via a speaker and microphone system. The following document identifies the steps we are able take to ensure that these calls, like all the features of the Street Hub, help improve the amenity of a local area whilst also respecting the expectations of local community over time. Please note: this noise management plan refers specifically

to the noise from the Street Hub. Noise from pedestrians, users of the Street Hub, or from other nearby sources are not included and would typically be considered matters for the Police and other authorities who have the appropriate and relevant powers to act on such issues if necessary.

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

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

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

Daytime (07:00 – 21:00)
Street Hub have controllable volume levels. This will default to 50% at the start of any user activity during the day and can be increased and decreased based on the preferences of the user.

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

Exceptional Circumstances

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

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

Further information

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

Conclusion

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

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

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

Planning Conditions

To give assurance that each Street Hub will operate as intended and the associated payphone removals will occur, we would be pleased to accept the following conditions or a mutually agreed version of them to be included as part of any planning consent:

a. Within three (3) months of development commencing the existing BT payphones shown above shall be removed in their entirety and the land made good to the same condition as the adjacent land.
b. Pavement surrounding the Street Hub shall be made good to the same condition as the adjacent land.
c. The intensity of the illumination of the two digital display screens shall not exceed 600 candelas per square metre (cd/m2) between dusk and dawn in line with the maximum permitted recommended luminance as set out by 'The Institute of Lighting Professional's 'Professional Lighting Guide 05: The Brightness of Illuminated Advertisements'.
d. 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.