PLANNING STATEMENT

Prepared by: Libre Solutions

On behalf of: BT Group

January 2026

SITE NAME:	**LAND ADJOINING 16 LORD STREET, WREXHAM, LL11 1LG**

DESCRIPTION OF PROPOSAL:	Relocation of the existing BT phone box to facilitate the installation of a proposed Global street hub, including the associated display of advertisements on both sides of the unit.
CLIENT NAME:	BT Group
REPORT TYPE:	Planning Statement
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VERSION:	1st Issue
DATE OF ISSUE:	29th January 2025

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1 INTRODUCTION

Application overview

This application for **Full Planning Permission** and **Advertisement Consent** is submitted by Libre Solutions on behalf of the BT Group to Wrexham County Borough Council ('the Council') for Land adjoining 16 Lord Street, Wrexham, LL11 1LG

About BT

BT InLinkUK service was first launched in 2017 and since then 494 InLink units were rolled out in 23 UK cities. In 2019 InLinkUK went into administration and no longer support the supply of these units to BT, so meaning the InLink product is no longer available. The InLink estate is under the full ownership of BT and since then, they have been working on their own new and improved unit, namely BT Street Hub.

BT Street Hub Project

BT is continuing to move forward with public connectivity and Street Hubs will provide a sleek and modern answer to the demands of a digitally connected society. BT Street Hub has all the existing benefits of the previous structure but with better Wi-Fi range, air quality monitoring, insight counting and small cell mobile connectivity. The addition of the 5G small cells to Street Hubs is very much in line with current UK Government's guidance on telecommunications developments and the National Infrastructure Strategy. Since the start of the original BT InLink project, the Government's commitment towards telecommunications deployment has been strengthened and NPPF 19, para 112 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)".

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, but that has not slowed BT down as they look to ramp up the upgrade of their kiosk estate with the rollout of new Street Hubs across the UK. They are continuing their commitment to invest and improve in the high street 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, it is a slightly larger structure from the first generation InLink units, in which it is 34cm longer, 7cm wider and 8.5cm taller.

Summary of the Proposal

The application seeks the **relocation** of the existing BT Kiosk, located within the redline boundary, and to **replace with a new generation BT Street Hub** measuring, 2986mm in height, 1236mm in width and 350mm in depth.



Figure 1– Existing and proposed Site and surrounding, (Source: Libre Solutions)

The existing phone box (to be removed) is also located outside of 16 Lord Street, approximately 25m northeast of the site, at the junction of Duke Street.



Figure 2 – Existing phone box (Source:GoogleMaps, 2018)

2 STRUCTURE OF THE REPORT

This Planning Statement is accompanied by the following supporting documents:

1. Cover Letter
2. Planning Drawings
3. Anti-Social Management Plan
4. Global Media Street Hub Unit Dimensions
5. Street Hub Product Statement
6. Street Hubs Beyond Connection
7. Lighting Guidance
8. Highways Notice

This planning statement is structured as follows:

- Site context
- Proposal description
- Assessment against national and local policy
- Summary and conclusion

3 SITE CONTEXT

Existing Site Description and Surrounding Area

The application site comprises a section of footpath adjoining 16 Lord Street. The site is set in an urban setting characterised by tall buildings and active shop frontages. Lord street is a pedestrianised street, and the street furniture consists of streetlamps, raised flower beds, street trees, bins, and public benches.

Relevant Designations

- Principal Shopping Street

Relevant Planning History

Having checked the Councils website, there are no previous planning applications relevant to the site.

4 PROPOSAL DESCRIPTION

The proposal is for the removal of the existing BT kiosk and installation of one Street Hub unit measuring 2986mm in height and 1236mm in width and 350mm in depth to be located on the section of footpath at the above address. The installation of a Street Hub will support the telephone and wi-fi coverage of the area.

The installation of the proposed Street Hub unit forms part of a strategic plan for the removal of existing, outdated BT payphones and adapting to contemporary demands. The proposed street hub will contribute to modernising and decluttering the council's streetscape, supporting the objectives of the UK Digital Strategy, and the relevant policies within the local Development Plan.

The Street Hub is proposed to be located 2.1m away from the flower bed, 3.6m away from the bin, and 4.8 m away from the nearest building to the southwest.

The new street hub, with its modern design and high-quality construction, will merge with the surrounding character and the existing mix of uses in the area and it is considered that the proposed advertising would be appropriate for this location.

5 LEGISLATION AND NATIONAL AND LOCAL PLANNING 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 Part 3 of the Town and Country Planning (Control of Advertisements) Regulations 1992 (Amendment) (Wales). 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.

Town and Country Planning (Control of Advertisements) Regulations 1992 (as amended)

PART I – of The Town and Country Planning (Control of Advertisements) Regulations 1992 (as amended) set out the Government's advertisement control planning policies for England and Wales and how these are expected to be applied. The Regulations are a material consideration for the Express Advertisement Consent application.

As per Regulation 4 of the Regulations, applications for Advertisement Consent must be determined in the interests of amenity and public safety. The determination will consider the localities characteristics including historic or cultural features and ensure advertisements do not endanger road safety or obscure traffic signs. There should not be unnecessary restrictions places upon an advertisement unless the Local Authority deem this required as a result of an impact on public safety or amenity.

PART III of The Town and Country Planning (Control of Advertisements) Regulations 1992 (as amended) sets out the procedural requirements for express advertisement consent, including the submission and determination of applications, the imposition of conditions, decision notification and rights of appeal.

The proposal fully accords with the requirements of these regulations which require local planning authorities to consider only amenity and public safety. In respect of amenity, the Street Hub is located within a commercial urban environment where illuminated displays are already an established

characteristic. The design, scale and appearance of the unit are consistent with surrounding street furniture and do not detract from local character or any feature of architectural, cultural or historic interest. The removal of outdated BT kiosks also reduces visual clutter, resulting in a net improvement to the streetscape. In respect of public safety, the siting of the unit ensures that it does not obstruct pedestrian movement, sightlines or the interpretation of highway signage, nor does it interfere with CCTV, security systems or traffic-monitoring devices. The installation therefore meets the statutory tests of amenity and public safety and complies with the Regulations.

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.

The proposal directly supports the ambitions of the UK Digital Strategy, which recognises digital connectivity as a modern utility essential for everyday life and economic growth. The Street Hub provides free, high-quality public Wi-Fi and modern communication services that help ensure residents, visitors and businesses can easily access digital information and online resources. This improved connectivity contributes to digital inclusion, offering support to individuals who may not have immediate access to personal broadband. By enhancing access to digital services within the town centre, the proposal advances the Strategy's aim of building a digitally confident society capable of participating fully in the modern economy.

UK Infrastructure Strategy: A 10 Year Strategy (June 2025)

The Report identifies that high-quality infrastructure boosts growth and plays a vital role in delivering higher living standards. Investment in infrastructure, including digital connectivity, will improve transport and communications networks, thereby supporting productivity and efficiency improvements.

The proposal is fully aligned with the UK Infrastructure Strategy, which emphasises the importance of high-quality infrastructure in boosting economic growth, supporting productivity and improving living

standards. The installation of the Street Hub represents an investment in modern digital infrastructure that improves public access to reliable connectivity and online services. By replacing outdated telephone kiosks with a multifunctional, efficient and contemporary unit, the proposal contributes to the Strategy's objective of upgrading existing infrastructure to meet current and future digital needs. As such, the development clearly supports national aims to deliver infrastructure that is resilient, accessible and capable of supporting a modern, competitive economy.

Future Wales: The National Plan 2040 (Future Wales, 2021)		
Chapter and Policy	**Section Number and Text (abridged)**	**Comments**
3. The Future Wales Outcomes	Ambition 1 - 'A Wales where people live and work in connected, inclusive and healthy places'. -Our cities, towns and villages will be physically and digitally well connected places, offering good quality of life to their residents.	The proposed Street Hub constitutes a sustainable development: it delivers social, economic, and environmental benefits, including improved digital connectivity, enhanced public realm and accessibility, and support for economic activity. The Street Hub supports economic growth by providing free high-quality digital connectivity, enhancing the attractiveness of the public realm, facilitating business access, and promoting digital inclusion. It aligns with national economic objectives and supports innovation and productivity. The Street Hub replaces existing BT payphone kiosks with a modern telecommunications infrastructure unit. It leverages established street-level infrastructure rather than introducing a large new mast, thereby improving network capacity. The proposal is
3. The Future Wales Outcomes	Ambition 5 – 'A Wales where people live and work in towns and cities which are a focus and springboard for sustainable growth'. -Cities and large towns will be magnets for jobs and investment, while people are drawn to live and work there for the economic and social opportunities they provide.	
3. The Future Wales Outcomes	Ambition 6 – 'A Wales where people live in places where prosperity, innovation and culture are promoted'. - Development plans will have a forward thinking, positive attitude towards enabling economic development, investment and innovation.	
3. The Future Wales Outcomes	Ambition 8 – 'A Wales where people live in places with world-class digital infrastructure'. -Broadband provision will develop and evolve, beginning with comprehensive coverage of superfast and progressing to ultra-fast fibre, which will help businesses to be more productive, resilient and innovative and	

	improve the way of life for communities and individuals.	consistent with promoting high-quality digital infrastructure and facilitating future network upgrades. The installation of the Street Hub represents efficient use of existing urban infrastructure, replacing obsolete payphone kiosks and consolidating services. It enhances the utility of the site without requiring additional land take or urban sprawl. The Street Hub's compact, slender design preserves pedestrian flow (footway width maintained). Its illuminated screens are in the context of a commercial streetscape where similar signage exists. There is no detrimental impact on the local visual character, street clutter, pedestrian or vehicular safety, or public amenity.
3. The Future Wales Outcomes Policy 2 Shaping Urban Growth and Regeneration-Strategic Placemaking.	The growth and regeneration of towns and cities should positively contribute towards building sustainable places that support active and healthy lives, with urban neighbourhoods that are compact and walkable, organised around mixed-use centres and public transport, and integrated with green infrastructure. Urban growth and regeneration should be based on the following strategic placemaking principles:	
3. The Future Wales Outcomes Policy 6 – Town Centre First	Significant new commercial, retail, education, health, leisure and public service facilities must be located within town and city centres.	
3. The Future Wales Outcomes Policy 13 – Supporting Digital Communications	The Welsh Government supports the provision of digital communications infrastructure and services across Wales. Planning authorities must engage with digital infrastructure providers to identify the future needs of their area and set out policies in Strategic and Local Development Plans to help deliver this.	
3. The Future Wales Outcomes Policy 14 – Planning in Mobile Action Zones	The Welsh Government supports increased mobile phone coverage and the associated economic and social benefits it brings.	

Planning Policy Wales (Edition 12, February 2024)		
Chapter	**Paragraph number and text (abridged)**	**Comments**
2. People and Places: Achieving Well-being Through Placemaking	Emphasises that planning policies, proposals and decisions must seek to promote sustainable development and support the well-being of people and communities across Wales.	The proposed Street Hub constitutes a sustainable development: it delivers social, economic, and environmental benefits, including improved digital connectivity, enhanced public realm and accessibility, and support for economic activity. The guidance supports approval where proposals accord with policy and deliver public benefits.

3. Strategic and Spatial Choices	Good Design Making Better Places and making healthier places. Sets out that good design is fundamental to creating sustainable places where people want to live, work and socialise.	The Street Hub has a compact, contemporary design that integrates with existing street furniture, maintains pedestrian accessibility, and respects the surrounding town centre character. The proposal makes effective use of existing footway space and replaces obsolete payphone infrastructure, avoiding additional land take. The proposed digital advertising element is appropriate within a commercial town centre context, does not harm visual amenity, and does not create hazards to pedestrians or traffic.
4. Active and Social Places	Active and Social Places are those which promote our social, economic, environmental and cultural well-being by providing well-connected cohesive communities.	Free public Wi-Fi and charging facilities support social inclusion and accessibility, particularly for people reliant on digital services. The Street Hub enhances town centre functionality by providing digital connectivity for residents, visitors, and businesses, supporting vitality and footfall.
5. Productive and Enterprising Places	The Productive and Enterprising theme covers the economic components of placemaking. These components are complementary to those of the Active and Social and Distinctive and Natural themes and collectively the three themes come together to contribute. The characteristics and environmental qualities of places varies across Wales, creating distinctive or unique features associated with their particular natural or cultural heritage and these should be recognised and valued.	The Street Hub replaces an existing payphone kiosk with modern telecom infrastructure, aligning with guidance to use existing street assets and improve network coverage without proliferation of new masts. The Street Hub does not adversely affect the setting of heritage assets and is appropriately scaled and sited within the existing streetscape.

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

Chapter	Paragraph number and text (abridged)	Comments
Part 1 Strategic Policies	Proposals for development will be supported where they are within defined settlement limits and do not materially detrimental to the landscape/townscape.	The Street Hub is a sustainable infrastructure proposal with no identified adverse impacts. The guidance supports approval where proposals accord with policy and deliver public benefits.
Policy S1 Shopping Streets in Wrexham Town Centre	Proposals will be permitted where they maintain and enhance the existing retail provision within the town and protect do not have a detrimental effect on the viability of the area.	The Street Hub enhances town centre functionality by providing digital connectivity for residents, visitors, and businesses, supporting vitality and footfall. Supports local businesses and economic activity by enhancing digital connectivity and town centre attractiveness.
Policy EC7 Conservation Areas And Policy EC9 Listed Buildings of Special Architectural or Historic Interest	The priority will be to preserve and/ or enhance buildings, structures, streets, trees, open spaces, archeological remains, views, and other elements which contribute to the unique character of the area. Development within the curtilage of, buildings or structures listed as of special architectural or historic interest must respect the setting and character of the listed buildings or structures.	The Street Hub does not adversely affect the setting of heritage assets and is appropriately scaled and sited within the existing streetscape.
Policy GDP1 Development Objectives	Development proposals should positively contribute to the nearby locality; take account of community safety; be of high quality design; Ensure safe and convenient pedestrian access; Ensure the safety of the public from adverse environmental effect; secure the development of sustainable communities	The Street Hub has a compact, contemporary design that integrates with existing street furniture, maintains pedestrian accessibility, and respects the surrounding town centre character. The proposal makes effective use of existing footway space and has been cited so as not to impact the existing highway or public safety.
Policy CLF8 Telecommunications	Development of telecommunications facilities will be permitted having regard to technical an	The Street Hub integrates with existing street furniture; it

	operational consideration. The siting of development should minimise the impact on the local landscape/townscape.	enhances public realm with a modern, context-appropriate design.

6 ASSESSMENT AGAINST NATIONAL AND LOCAL PLANNING POLICY

Assessment overview

The areas of assessment are set out as follows:

- Principle of development
- Amenity
- Design
- Heritage
- Public Realm
- Sustainable transport, accessibility and traffic
- Crime, Security and Safety

Principle of Development

Policy 13 of the Future Wales National Plan supports the provision of digital communications infrastructure across Wales. Paragraph 5.2.5 of the PPW states that the planning system should support telecommunications infrastructure where required and ensure that amenity considerations and protected land/buildings are equally considered. Additionally, Paragraph 5.2.21 also provides support for development proposals which provide new broadband infrastructure or improvements to existing networks or apparatus.

The proposal involves the replacement of an existing BT payphone kiosk with a modern Street Hub providing free public Wi-Fi, telecommunications services and smart infrastructure within a highly accessible town centre location. The proposal utilises existing street-level infrastructure and does not introduce a new or intrusive form of development.

The principle of the development is therefore acceptable, subject to appropriate consideration of design and amenity impacts.

Amenity

Advertisement consent must be assessed in accordance with Regulation 4 of the Town and Country Planning (Control of Advertisements) Regulations (1992), which limits consideration to the interests of amenity and public safety.

The proposed Street Hub incorporates two digital advertising screens that are appropriately scaled and static in nature. The scale, luminance and positioning of the screens are controlled and do not visually dominate their surroundings.

In terms of noise, The Future Wales National Plan (Page 87) and Paragraph 6.7.4 of the PPW state that air and noise pollution should aim to be reduced by considering the long-term effects of both the current and predicted noise pollution levels. The Street Hub includes controlled sound output, reduced night-time volume levels and directional speakers audible only to users standing immediately adjacent to the unit. These measures ensure that the proposal would not result in unacceptable noise impacts on nearby occupiers or detract from the amenity of the street.

Accordingly, the proposal complies with amenity considerations under the Advertisement Regulations and Policy GDP1 of the Wrexham Local Plan.

Design

Paragraph 3.9 of the PPW notes that special characteristics of an area should be central to the design of the development. Additionally, there is emphasis on the layout, form, scale and visual appearance of a proposed development and its relationship to its surroundings being important planning considerations.

The proposed Street Hub is a contemporary, purpose-designed structure with a slim vertical profile and limited footprint. Its neutral materials and restrained detailing ensure that it reads as modern street furniture rather than a dominant structure. The scale of the unit is modest in relation to the surrounding buildings and street width, and it does not interrupt key views.

Locally, Policy GDP1 of the Wrexham Local Plan requires development to respect local character and townscape quality. The proposal meets these requirements and represents a visual and functional improvement over the existing, outdated BT kiosk.

Heritage

Policy EC9 of the Wrexham Local Plan (2005) requires development affecting heritage assets or their settings to conserve their significance.

The application site is not located within a Conservation Area and does not affect any listed buildings or their settings. The proposal will not result in harm to heritage assets or the historic environment and is therefore compliant with heritage policy requirements.

Public Realm

Paragraph 3.3 of the PPW notes that in order to achieve sustainable development, consideration should be taken for how space is used, how buildings and the public realm support this use, as well as its construction, operation, management, and its relationship with the surrounding area.

The siting of the Street Hub has been carefully assessed in relation to pedestrian desire lines, existing street furniture and footway width. The proposal consolidates multiple telecommunications and digital functions into a single structure and facilitates the removal of redundant BT infrastructure, resulting in a net improvement to the public realm.

The unit is located on a wide section of footway and maintains clear pedestrian routes in accordance with inclusive design standards. The proposal therefore enhances the functionality and appearance of the public realm.

Sustainable Transport, Accessibility and Traffic

The Street Hub has been positioned to maintain footway widths exceeding minimum standards set out in Manual for Streets and Inclusive Mobility guidance. The interface is located at an accessible height and positioned to ensure users stand clear of the carriageway.

The proposal does not generate vehicular traffic, servicing requirements or parking demand. No adverse impacts on highway or pedestrian safety are identified.

Crime, Security and Safety

Paragraph 3.11 of the PPW emphasises that crime prevention and addressing fear of crime should be considered in planning and development. The goal is to create safe, secure environments that maintain high design quality and contribute to cohesive, well-functioning communities.

The Street Hub contributes positively to safety through integrated lighting, passive surveillance, emergency calling facilities and the ability to display public safety messaging. A comprehensive Anti-Social Behaviour Management Plan accompanies the application and sets out clear measures to address potential misuse.

The proposal therefore accords with national and London-wide policy objectives relating to crime prevention, security and public safety.

7 PLANNING BALANCE

The application seeks planning permission for the installation of a single Street Hub unit on the public footway. The proposal forms part of a wider programme to modernise telecommunications infrastructure and improve digital connectivity within town centres.

Benefits of the Proposal

The proposal delivers a range of social, economic, and environmental benefits, consistent with the objectives of the development plan and national planning policy.

- From a social perspective, the Street Hub will provide free public Wi-Fi, emergency calling facilities, and device charging, supporting digital inclusion and accessibility for residents, workers, and visitors. This aligns with the Future Wales National Plan which states that the Welsh Government, planning authorities and digital communications infrastructure providers must work together to ensure both mobile telecommunications and fast broadband infrastructure and services are provided.
- In economic terms, the provision of modern digital infrastructure within a town center location supports business activity, visitor experience, and overall town center vitality. Enhanced connectivity contributes to productivity to support a strong, competitive and digitally enabled economy.
- From an environmental and land-use perspective, the proposal represents an efficient use of land by reusing existing street infrastructure and removing redundant payphone kiosks. This contributes to streetscape decluttering and avoids the need for additional land take or the installation of larger telecommunications structures, consistent with national policy and guidance on effective use of land and high-quality communications infrastructure.
- Data indicates that between Nov 2024-Nov 2025 over 1,900,00 calls have been made to essential charities for vulnerable people via BT Street Hubs. 2,010 calls to Childline, 1,640 Call to Youth Homelessness, 2,896 calls to Samaritans and 1,558 calls to Missing People.

The design of the Street Hub is compact, modern, and appropriate to its commercial town center context. It maintains adequate footway width, does not impede pedestrian movement, and integrates with existing street furniture. The proposal therefore accords with development plan policies relating to design quality, public realm, and pedestrian safety.

Potential Impacts

The potential impacts of the proposal relate primarily to visual amenity, public safety, and heritage considerations.

- In terms of visual impact, the Street Hub is of modest scale and slender form and is located within an established commercial streetscape where signage and street furniture are already prevalent. Any associated digital advertising is controlled in scale and illumination and would not result in visual clutter or harm to local character.
- Regarding public safety and accessibility, the unit has been carefully sited to maintain pedestrian flow and avoid conflict with existing street furniture, trees, and transport infrastructure. No adverse impacts on highway or pedestrian safety have been identified.
- In relation to the historic environment, the proposal does not result in harm to the setting of any designated or non-designated heritage assets. The scale, design, and siting of the Street Hub ensure that the significance of heritage assets, where present, is preserved.

8 CONCLUSION

When assessed against the Development Plan as a whole, and in the context of national planning policy and guidance, the proposal is fully compliant with relevant policies within the National and local policies.

The identified benefits of the proposal, including enhanced digital connectivity, improved public realm, support for town centre vitality, and efficient use of existing infrastructure are substantial and carry significant weight. No material harms have been identified that would outweigh these benefits.

Accordingly, in the overall planning balance, the proposal represents sustainable development and there are no adverse impacts that would significantly and demonstrably outweigh the benefits. The application is therefore considered acceptable in planning and advertisement consent terms and should be supported and approved.