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The Department of Planning
Neath Port Talbot Council
Brunel Way
Briton Ferry
Neath
SA11 2GG

NPT-002

30th October 2025

Dear Planning,

BT Street Hub Project Full Planning and Advertising Application NPT-002 Pavement o/s 99 Station Road, Port Talbot, SA13 1NR (E 276621, N 189991)

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. BT are moving forward with this particular case and are applying to Neath Port Talbot Council for full planning permission and advertisement consent for the installation of Ino. BT Street Hub.

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 across the region of Port Talbot and all major UK towns and 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 will help the planning system actively manage patterns of growth in support of national air quality objectives and the Government's ten-point plan for a Green Industrial Revolution. It 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 and redundant BT phone boxes.

This submission is comprised of the following documents:

- Site specific Planning and Design & Access statement;
- IApp forms and certificates generated by the Planning Portal;
- The prescribed fee of £1,176 (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 Professionals' 'Professional Lighting Guide 05: The Brightness of Illuminated Advertisements' 2023 for your reference;
- International Commission on Non-Ionizing Radiation Protection (ICNIRP) certificate.

In this particular case, a new BT Street Hub is proposed on the pavement outside 99 Station Road, Port Talbot. In certain situations, redundant phone boxes will be removed and replaced with a new Street Hub. In this particular instance, there are no existing phone boxes to be removed from the application site.

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 application 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,

Lewis Baldwin

Lewis Baldwin MRTPI

Senior Acquisition & Planning Surveyor at Mitie

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Planning, Design and Access Statement

Our Ref.'s	NPT-002
Address	Pavement o/s 99 Station Road, Port Talbot, SA13 1NR
Lat/ Long	51.595212, -3.782597
Site Type	New unit

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 Ino. BT Street Hub.

Photomontage of Proposed Installation



Proposed Kiosk Removal

Tel: 01639887347

Address: O/s Glanafan Comp School,
Station Road, Port Talbot SA13 1LZ



UK Digital Strategy

Digital connectivity in 2025 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 the 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 cell capabilities, air monitoring and much more.

Town and Country Planning (Control of Advertisements) Regulations 1992

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 the Town and Country Planning (Control of Advertisements) (Wales) Regulations 1992 [the Regulations]. Applications for full planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise. Under the advertisement Regulations, Express Consent is required for the advertisement element, notably the 2no digital screens on each side of the Street Hub. 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) (Wales) 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

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

(1) "A local planning authority shall exercise their powers under these Regulations only in the interests of amenity and public safety, taking into account;

(a) in the case of amenity, the general characteristics of the locality, including the presence of any feature of historic, architectural, cultural or similar interest, disregarding, if they think fit, any advertisement being displayed there;

(b) in the case of public safety—

(i) the safety of any person who may use any road, railway, waterway, dock, harbour or aerodrome;

- (ii) *whether any display of advertisements is likely to obscure, or hinder the ready interpretation of, any road traffic sign, railway signal or aid to navigation by water or air.*

(2) In determining an application for consent for the display of advertisements, or considering whether to make an order revoking or modifying a consent, the local planning authority may have regard to any material change in circumstances likely to occur within the period for which the consent is required or granted.

(3) 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.

(4) A consent for the display of advertisements shall take effect as consent for the use of the site for the purposes of the display, whether by the erection of structures or otherwise, and for the benefit of any person interested in the site."

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 (February 2024)

The Welsh Government's latest Planning Policy Framework – Planning Policy Wales 'PPW' was published in February 2024 (Edition 12) and the Government's approach is to continue to strongly support communications infrastructure. PPW remains very supportive of high-quality communications. Indeed, a whole chapter is dedicated to high-quality communications, emphasising the importance that the Government attaches to digital connectivity. Paragraph 5.2.1 states that *"Affordable, secure electronic communications infrastructure is essential to people and businesses. The availability and exchange of information afforded by telecommunications ensures people are connected to important services, their communities and the wider world and is essential for long term prosperity. Fast reliable connections are essential to meet the needs of businesses and other organisations, and to those at home accessing digital services and working. Greater numbers of individuals working from home are a growing trend and planning authorities should consider the implications of this when preparing their development plans."* It also includes the importance of *reliable* communications infrastructure for both economic growth and social well-being.

PPW continues to support the expansion of electronic communications networks at paragraph 5.2.9. It notes that 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. The economic and social benefits of providing high-quality and reliable communications infrastructure are well documented and can be found later in this Supporting Information Statement.

PPW supports the provision and promotion of safe and attractive streets:

Paragraph 4.1.20 – *"The design and layout of streets must give a high priority to their role as public spaces and meeting the needs of pedestrians, cyclists and public transport users, reflecting the principles of the sustainable transport hierarchy. To create streets that are social places, the public realm needs to be safe and attractive and the street designed for low speeds of 20 mph or less."*

PPW states the following specifically in relation to advertisement control in section 6:

Paragraph 6.1.15 – *“There is a strong presumption against the granting of planning permission for developments, including advertisements, which damage the character or appearance of a conservation area or its setting to an unacceptable level. In exceptional cases, the presumption may be overridden in favour of development considered desirable on public interest grounds.”*

PPW makes reference to 5G and electronic communications systems:

Paragraph 5.2.11 – *“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.”*

With the above in mind, the Government is already forward-thinking the evolution of data networks and seeks planning decisions to take account of this. 5G technology provides increased speed of data and more capacity in the network, to ensure that handheld devices can continue to be used for the purposes in which they were purchased. This will bring even greater economic and social benefits to the area.

Paragraph 5.2.10 of PPW refers to determining applications on planning grounds only – *“Planning authorities should not question the need for the telecommunications system nor seek to prevent competition between different operators. Planning authorities may be able to assist mobile operators by identifying local authority owned land and property suitable for telecommunications development or by encouraging others to make sites available.”*

Code of Practice for Wireless Network Development in Wales

The Code of Practice provides guidance to Code Operators (referred to as ‘operators’ throughout the Code of Practice), including the Mobile Network Operators and wireless infrastructure providers, their agents and contractors, local planning authorities, and all other relevant stakeholders in Wales on how to carry out their roles and responsibilities when installing wireless network infrastructure. It is also a useful tool for other interested stakeholders such as community groups, amenity bodies and individuals with an interest in mobile connectivity.

The aim of the Code of Practice is to support the Welsh Government’s objective of delivering high-quality wireless infrastructure whilst balancing these needs with environmental considerations. It also has an important role in making sure that appropriate engagement takes place with local communities and other interested parties.

The Code of Practice covers all forms of wireless infrastructure development, including mobile towers and cabinets. It is recommended that other wireless communications operators follow the principles of this Code of Practice, where appropriate.

The Code of Practice sets out the legal and policy framework for the delivery of wireless infrastructure development. The document also sets out the importance of connectivity. The following extracts have been captured from the document:

“Affordable, secure digital infrastructure is essential to people and businesses. The availability and exchange of information afforded by telecommunications ensures people and businesses are connected to communities and the wider world and are essential for long term prosperity. Modern society demands reliable and fast communication networks to drive economic activity, to allow people to keep in touch and to access public services.

Mobile connectivity plays a central role in digitally connecting people and businesses connecting them to the internet, the cloud and to each other.

The Welsh Government programme for government, Taking Wales Forward, sets out four cross-cutting strategies:

- *prosperous and secure;*
- *healthy and active;*
- *ambitious and learning, and*
- *united and connected*

Mobile connectivity directly supports the United and Connected theme through connecting people and communities but also supports the three others by enabling business connectivity, the delivery of public services and learning opportunities.

Better mobile connectivity also underpins many of the ambitions in the Future Generations and Well-Being Act enabling communities to connect, supporting participation, enabling education and skills, and providing access to key services.

Although telecommunications policy is not devolved to Wales, the Welsh Government recognises the importance of mobile connectivity and is working to create the right environment to encourage further investment in mobile infrastructure and to promote innovation in mobile technologies through the Mobile Action Plan for Wales.

The Mobile Action Plan for Wales recognises that the planning regime has a key part to play in maximising mobile phone coverage across the country. It sets out a number of actions to create a planning environment that is fit for Wales, reflecting its topography and population distribution, balancing the local economic and societal benefits of better mobile signal coverage and capacity with the need to safeguard sensitive landscape areas and protect residential amenity. The revision of the Code of Best Practice on Mobile Phone Network Development is one of those actions.”

“As technology has evolved, we have been able to do more and more with our mobile devices. Second generation (2G) technology gave us voice calls and text messages, and third generation (3G) gave us access to the internet and other data on the move. More recently, 4G brings superfast mobile broadband at speeds roughly equivalent to those you would expect from a fixed broadband connection. The advent of 5G networks will bring very high speed, high bandwidth and low latency connectivity not just for use with mobile handsets but also for a range of other internet of things (IoT) uses including industrial and real time monitoring. Much of the guidance in this document relates to the deployment of 5G infrastructure.”

The Welsh Government recognises the key role that the Planning System plays in delivering the digital infrastructure that we need, in a sustainable and well-designed way, especially as households and businesses become increasingly reliant on mobile connectivity.

The Code of Practice sets out the principles and commitments that operators should follow when developing their networks inter alia:

- **Site sharing and use of existing structures:** make use of existing structures, sites and towers wherever possible to reduce the need for new development.
- **Consultation with local planning authorities, local communities and other stakeholders.**
- **Standardised and high-quality approach to planning applications, and the notification procedure:** provide standardised supporting documentation for planning applications (where appropriate) within the context of national and local requirements.
- **Compliance with guidance laid out in the International Commission on Non-Ionizing Radiation (ICNIRP) public exposure levels guidance.**

The Code of Practice supports the roll out of mobile infrastructure, sets out the engagement framework for mobile network operators and planning authorities when considering applications for planning, seeks to avoid areas of conflict and supports a more collaborative approach to the deployment and improvement of digital connectivity throughout Wales.

Local Planning Policy

Neath Port Talbot County Borough Council Local Development Plan (2011 - 2026)

The Local Plan covers the planning process for the area of Neath Port Talbot and was adopted in January 2016. It is considered the following policies are applicable and in accordance with this case:

- Strategic Policy SP1 Climate Change
- Strategic Policy SP4 Infrastructure
- Strategic Policy SP13 Tourism
- Policy TR2 Design and Access of New Development
- Strategic Policy SP21 Built Environment and Historic Heritage
- Policy BE1 Design

“Policy SP 1 - Climate Change

The causes and consequences of climate change will be addressed by implementing the following measures.

In relation to the causes of climate change:

- 1. The efficiency and sustainability of the County Borough’s settlements will be enhanced through developing more cohesive and efficient settlements and settlement patterns, and consequently more sustainable travel patterns;*
- 2. Greenhouse gas emissions from transport will be minimised through encouraging freight / commercial transport by alternatives to road (e.g. rail or sea);*
- 3. Dependence on the private car and the need to travel in general will be reduced through promoting alternative means of transport and more efficient use of existing facilities, co-location and joint use of facilities;*
- 4. Provision will be made for the County Borough’s appropriate contribution to renewable and low carbon energy generation.*

In relation to the consequences of climate change:

- 1. Likely increased flood risk will be taken into account and addressed by ensuring that there is greater resilience by avoiding development on land that is at risk from flooding in the first instance in accordance with the sequential approach set out in national guidance or in locations that could increase the risk of flooding elsewhere;*
- 2. The fragmentation of habitats will be minimised and opportunities made for habitat and species change and migration where possible.”*

“Policy SP 4 - Infrastructure

Developments will be expected to make efficient use of existing infrastructure and where required make adequate provision for new infrastructure, ensuring that there are no detrimental effects on the area and community.

Where necessary, Planning Obligations will be sought to ensure that the effects of developments are fully addressed in order to make the development acceptable.”

“Policy SP 13 – Tourism

The economic prosperity of Neath Port Talbot will be promoted through encouraging continued growth in the tourist sector by:

1. Encouraging high quality, sustainable tourism development;
2. Providing a flexible approach to the development and conversions to tourism facilities;
3. Resisting, where appropriate, proposals which would result in the loss of tourism facilities;
4. Supporting tourism proposals through the allocation of land for tourism development.”

“Policy TR 2 - Design and Access of New Development

Development proposals will only be permitted where all of the following criteria, where relevant, are satisfied:

1. The development does not compromise the safe, effective and efficient use of the highway network and does not have an adverse impact on highway safety or create unacceptable levels of traffic generation;
2. Appropriate levels of parking and cycling facilities are provided and the access arrangements for the site allow for the safe manoeuvring of any service vehicles associated with the planned use;
3. The development is accessible by a range of travel means, including public transport and safe cycle and pedestrian routes;
4. Transport Assessments and Travel Plans are provided for developments that are likely to create significant traffic generation.”

“Policy SP 21 - Built Environment and Historic Heritage

The built environment and historic heritage will, where appropriate, be conserved and enhanced through the following measures:

1. Encouraging high quality design standards in all development proposals;
2. Protecting arterial gateways from intrusive and inappropriate development;
3. Safeguarding features of historic and cultural importance;
4. The identification of the following designated sites to enable their protection and where appropriate enhancement:
 - (a) Landscapes of Historic Interest;
 - (b) Historic Parks and Gardens;
 - (c) Conservation Areas;
 - (d) Scheduled Ancient Monuments; and
 - (e) Listed Buildings and their curtilage.”

“Policy BE I – Design

All development proposals will be expected to demonstrate high quality design which fully takes into account the natural, historic and built environmental context and contributes to the creation of attractive, sustainable places.

Proposals will only be permitted where all of the following criteria, where relevant, are satisfied:

- 1. It complements and enhances the character and appearance of the site, building or area in terms of siting, appearance, scale, height, massing and elevation treatment;*
- 2. It respects the context of the site and its place within the local landscape, including its impact on the important arterial gateways into the County Borough, its effects on townscape and the local historic and cultural heritage and it takes account of the site topography and prominent skylines or ridges;*
- 3. It utilises materials appropriate to its surroundings and incorporates hard and soft landscaping and screening where appropriate;*
- 4. It would not have a significant adverse impact on highway safety, the amenity of occupiers of adjacent land or the community;*
- 5. Important local features (including buildings, amenity areas, green spaces and green infrastructure, biodiversity and ecological connectivity) are retained and enhanced as far as possible;*
- 6. It achieves and creates attractive, safe places and public spaces, taking account of ‘Secured by Design’ principles (including where appropriate natural surveillance, visibility, well lit environments and areas of public movement)*
- 7. It plays a full role in achieving and enhancing an integrated transport and communications network promoting the interests of pedestrians, cyclists and public transport and ensures linkages with the existing surrounding community;*
- 8. It uses resources, including land and energy, as efficiently as possible through:*
 - (a) Making the best and most efficient use of the land available through being of appropriate density taking into account the character and appearance of the area, normally a minimum of 35 dwellings per hectare in the Coastal Corridor Strategy Area or a minimum of 30 dwellings per hectare in the Valleys Strategy Area;*
 - (b) The layout and form of the development does not preclude the reasonable use of other adjacent land;*
 - (c) Developing brownfield land in preference to greenfield land where possible;*
 - (d) Minimising building exposure while maximising solar gain.*
- 9. Its drainage systems are designed to limit surface water run-off and flood risk and prevent pollution;*
- 10. The layout and design of the development achieves inclusive design by ensuring barrier free environments, allowing access by all and making full provision for people with disabilities.”*

BT Street Hubs provide a network service to the immediate area without the requirement for harsh, utilitarian street additions (e.g. Telecommunication Masts) while simultaneously acting as an



advertisement, interactive tourist information hub, air quality monitoring hub with an ability to connect with emergency services. This proposal sensitively integrates telecommunications equipment through a valuable addition to the street scene.

The BT Street Hubs have been designed to be a minimal addition to the surrounding character and setting of the areas in which they are sited. The border of the main display encompasses darker shades to soften the visual impact of each unit and to keep the impacts of amenity and setting to an acceptable level. Lighting is reduced at night to reduce the impact on light pollution and to prevent being an overbearing visual addition to the street scene. There is a frequent maintenance schedule for each unit wherein they are cleaned regularly and kept in good working condition. The new BT Street Hubs will act as a modern, clean and usable street furniture replacement. This proposal will be of a high-quality design and usability, directly improving the street scene of the area.

As outlined in the following section, the proposed Street Hub will provide the Local Authority with valuable environmental data to assist the Council in their own green agenda and is considered to assist the Authority in shaping the planning system.

The site is not within a conservation area however is situated within proximity of a listed building. As a result, further details are included within the heritage statement which forms part of this document.

Pre-application advice

A formal pre-application consultation request was recently sent to Neath Port Talbot Council, introducing the BT Street Hub project and to obtain feedback with regards to the various locations identified within the area for the siting of this new apparatus.

The decision has been made to progress the site without pre-application advice in an effort to move the project forward 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 unforeseen issues.

Planning History

- No history identified.

New site

In this instance, the proposed scheme involves deploying a new Street Hub upon a particularly wide stretch of pavement to the front of 99 Station Road, Port Talbot, SA13 1NR.

Siting Justification against Planning Policy

At the conception stage, we have sought locations with wide pavements, and where a sites relationship with existing street furniture avoids undue proliferation of clutter.

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, whilst the need for Wi-Fi and mobile coverage has increased significantly. 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 with each unit housing 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 does not automatically result in an overwhelming adverse harm occurring.

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 and the visual character of that particular street scene where the new Street Hub is proposed. 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 a 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

The proposed site is situated on Station Road, within the centre of North Talbot. The western side of the street features a two storey terraced block with retail units occupying the ground floor. The exterior of the building is finished in stone with typical shop fronts occupying the ground floor. A glass canopy attached to the front of the terraced block partially covers the pavement below and provides pedestrians with a degree of protection from the elements. Outlets include a bakery, charity shops and a bank.

The application site is situated upon a wide pavement alongside other street furniture including seating benches, trees, bicycle racks, lamppost and litter bin. The proposed BT Street Hub will be positioned in between two planters/trees and bike racks.

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 to the area.

The proposed design is slimmer and takes a more compact profile than a conventional phone box, which many of these units are 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 will give a slender more elegant form of development when compared to a typical payphone. As a result, the appearance of the structure is not considered to be harmful to the wider street scene



and we consider the appearance of the area and street scene will not be compromised by the installation.

The new structure will sit within a commercial setting and busy area 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 will not be out of keeping with this stretch of road which is well lit by streetlights and window displays. In this context, the BT Street Hub design will not appear detrimental to the amenity of this particular stretch of Station Road.

It is concluded that the design of the proposed Street Hub is justified, and its appearance will blend into the adjacent shop frontages. Overall, we consider the appearance of the proposed Street Hub is acceptable and in accordance with national and local planning policies.

Pavement Width

The existing pavement is just under 7 metres wide. The total width of the Street Hub is 1.236 metres. The Street Hub will be set back from the roadside kerb, maintaining a clearance of some 5.7 metres between the installation and the adjacent shop fronts, allowing the safe passage of pedestrians. It is of note that the structure has a depth of 350mm, so any minor narrowing of the footway will occur 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 will not create significant harm to the amenity of the area that will 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 will 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 will 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 will not cause unacceptable interference with nearby road signs and or navigational lights. Viewed within the street scene setting, the digital advertisements shall be seen by passing motorists but not create confusion nor influence the behaviour of drivers to such a degree that they cause a hazard by reason of their presence. The proposed Street Hub will be sited away from road junctions so as not to 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 will appear as an untoward feature to passing motorists. As detailed, the installation will be positioned within a largely pedestrianised area.

Regarding pedestrian safety, the Street Hub is positioned on a particularly wide section of pavement without impeding pedestrian movements as ample footway width will 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 will not be put at risk as they shall be set away from any vehicular roads.

The area surrounding this specific site is visually busy with many retail premises and shop fronts. The proposal shall 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) (Wales) Regulations 1992:

The planning regime for larger, professional adverts, signs for businesses and is complex. However, outdoor advertisements must comply with five standard conditions:

1. be kept clean and tidy
2. be kept in a safe condition
3. have the permission of the owner of the site on which they are displayed (this includes the Highway Authority if the sign is to be placed on highway land)
4. not obscure, or hinder the interpretation of, official road, rail, waterway or aircraft signs, or otherwise make hazardous the use of these types of transport
5. be removed carefully where so required by the planning authority.

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 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 to 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 Hubs 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.

Nighttime (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 Hubs are fitting into 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, please contact streethub@bt.com.

Heritage Statement

It is important to note that the application site is situated within proximity of Bethany Chapel. The Grade II listed building (reference: 23252) is positioned on the corner of Station Road and Riverside Walk. The three storey building which is finished in stone and has a pitched roof, fronts onto Station

Road and the same terrace of shops as the application site, albeit, the building sits approximately 65 metres north-east of the application site and the planned location of the BT Street Hub.

The Chapel is surrounded by more modern development, including a two story commercial property immediately south of its location. Furthermore, due to the geographical distance of the proposed Street Hub from the Chapel, its orientation and the overall size/scale of the proposed installation, it is considered the proposed BT Street Hub will have a negligible impact upon this listed property. Furthermore, due to the scale of the surrounding buildings, at 2.98m in height, the Street Hub will benefit from being shorter than most of the surrounding street furniture and when viewed from a modest distance, will blend into the aesthetics of the street scene which features a number of shop fronts.

It is accepted that there will always be challenges faced in finding a balance between limiting any visual harm created by the siting of development upon heritage assets when weighed up against the public benefits it will bring to the area. When seen in perspective within the street scene, it is considered that the proposed siting and orientation of the BT Street Hub, will not appear incongruous or have a significant material impact on the setting or views of the Bethany Chapel. While deemed negligible, it is ultimately considered that any minor harm upon the aforementioned heritage asset will be outweighed by the significant public benefits of the Street Hub which is already dominated by modern shop frontages and an array of street furniture.

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, bringing significant improvements when compared to conventional phone boxes which are still commonplace in city and town centres throughout the Country. 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; 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 Planning Policy Wales 'PPW' and local development plan policies, in which we hope 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. Pavement surrounding the Street Hub shall be made good to the same condition as the adjacent land.
- b. The intensity of the illumination of the two digital display screens shall not exceed 600 candelas per square metre (cd/m²) between dusk and dawn in line with the maximum permitted recommended luminance as set out by 'The Institute of Lighting Professional's 'Professional Lighting Guide 05: The Brightness of Illuminated Advertisements'.



- c. The digital display screens shall not display any moving, or apparently moving, images (including animation, flashing, scrolling three dimensional, intermittent or video elements).
- d. The minimum display time for each piece of content on the digital display screens shall be 10 seconds.
- e. The interval between each piece of content on the digital display screens shall take place over a period no greater than one second; the complete screen shall change with no visual effects (including swiping or other animated transition methods) between displays and the display will include a mechanism to freeze the image in the event of a malfunction.
- f. No content on the digital display screens shall resemble traffic signs, as defined in section 64 of the Road Traffic Regulation Act 1984.

Should your department 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.