Development Control
Gloucester City Council
PO Box 3252, Gloucester, GL1 9FW
01452 396396
development.control@gloucester.gov.uk
www.gloucester.gov.uk/planning

Application for Planning Permission

Town and Country Planning Act 1990 (as amended)

Publication of applications on planning authority websites

Please note that the information provided on this application form and in supporting documents may be published on the Authority's website. If you require any further clarification, please contact the Authority's planning department.

Site Location

Disclaimer: We can only make recommendations based on the answers given in the questions.

If you cannot provide a postcode, the description of site location must be completed. Please provide the most accurate site description you can, to help locate the site - for example "field to the North of the Post Office".

Number

Suffix

Property Name

Address Line 1

Address Line 2

Address Line 3

Town/city

Postcode

Description of site location must be completed if postcode is not known:

Easting (x)

383436

Northing (y)

219146

Description

Footpath outside Kingsholm Stadium, Kingsholm Road, Gloucester, GL1 3AX

Applicant Details

Name/Company

Title

Mr

First name

James

Surname

Browne

Company Name

British telecommunication PLC

Address

Address line 1

pp HWH300

Address line 2

PO Box 67501

Address line 3

BT Centre

Town/City

London

Country

Postcode

EC1P 1PG

Are you an agent acting on behalf of the applicant?

- [x] Yes
- [ ] No

Contact Details

Primary number

***** REDACTED ******

Secondary number

Fax number

Email address

***** REDACTED ******

Agent Details

Name/Company

Title

Mr

First name

Martin

Surname

Brown

Company Name

Harlequin Group

Address

Address line 1

Rutland House

Address line 2

5 Allen Road

Address line 3

Town/City

Livingston

Country

Postcode

EH54 6TQ

Contact Details

Primary number

***** REDACTED ******

Secondary number

Fax number

Email address

***** REDACTED ******

Site Area

What is the measurement of the site area? (numeric characters only).

25.00

Unit

Sq. metres

Description of the Proposal

Please note in regard to:

- **Fire Statements** - From 1 August 2021, planning applications for buildings of over 18 metres (or 7 stories) tall containing more than one dwelling will require a 'Fire Statement' for the application to be considered valid. There are some exemptions. View government planning guidance on fire statements or access the fire statement template and guidance.
- **Permission In Principle** - If you are applying for Technical Details Consent on a site that has been granted Permission In Principle, please include the relevant details in the description below.
- **Public Service Infrastructure** - From 1 August 2021, applications for certain public service infrastructure developments will be eligible for faster determination timeframes. See help for further details or view government planning guidance on determination periods.

Description

Please describe details of the proposed development or works including any change of use

REMOVAL OF EXISTING BT PHONE BOX AND INSTALLATION OF A PROPOSED REPLACEMENT BT STREET HUB AND ASSOCIATEED DISPLAY OF ADVERTISMENT TO BOTH SIDES OF THE UNIT.

Has the work or change of use already started?

◯ Yes
⊘ No

Existing Use

Please describe the current use of the site

SITE HOSTS EXISTING BT PHONE BOX

Is the site currently vacant?

◯ Yes
⊘ No

Does the proposal involve any of the following? If Yes, you will need to submit an appropriate contamination assessment with your application.

Land which is known to be contaminated

◯ Yes
⊘ No

Land where contamination is suspected for all or part of the site

◯ Yes
⊘ No

A proposed use that would be particularly vulnerable to the presence of contamination

◯ Yes
⊘ No

Materials

Does the proposed development require any materials to be used externally?

◯ Yes
⊘ No

Pedestrian and Vehicle Access, Roads and Rights of Way

Is a new or altered vehicular access proposed to or from the public highway?

◯ Yes
⊘ No

Is a new or altered pedestrian access proposed to or from the public highway?

◯ Yes
⊘ No

Are there any new public roads to be provided within the site?

◯ Yes
⊘ No

Are there any new public rights of way to be provided within or adjacent to the site?

◯ Yes
⊘ No

Do the proposals require any diversions/extinguishments and/or creation of rights of way?

◯ Yes
⊘ No

Vehicle Parking

Does the site have any existing vehicle/cycle parking spaces or will the proposed development add/remove any parking spaces?

◯ Yes
⊘ No

Trees and Hedges

Are there trees or hedges on the proposed development site?

◯ Yes
⊘ No

And/or: Are there trees or hedges on land adjacent to the proposed development site that could influence the development or might be important as part of the local landscape character?

◯ Yes
⊘ No

If Yes to either or both of the above, you may need to provide a full tree survey, at the discretion of the local planning authority. If a tree survey is required, this and the accompanying plan should be submitted alongside the application. The local planning authority should make clear on its website what the survey should contain, in accordance with the current 'BS5837: Trees in relation to design, demolition and construction - Recommendations'.

Assessment of Flood Risk

Is the site within an area at risk of flooding? (Check the location on the Government's Flood map for planning. You should also refer to national standing advice and your local planning authority requirements for information as necessary.)

◯ Yes
⊘ No

Is your proposal within 20 metres of a watercourse (e.g. river, stream or beck)?

◯ Yes
⊘ No

Will the proposal increase the flood risk elsewhere?

◯ Yes
⊘ No

How will surface water be disposed of?

☐ Sustainable drainage system

☐ Existing water course

☑ Soakaway

☐ Main sewer

☐ Pond/lake

Biodiversity and Geological Conservation

Is there a reasonable likelihood of the following being affected adversely or conserved and enhanced within the application site, or on land adjacent to or near the application site?

To assist in answering this question correctly, please refer to the help text which provides guidance on determining if any important biodiversity or geological conservation features may be present or nearby; and whether they are likely to be affected by the proposals.

a) Protected and priority species

◯ Yes, on the development site
◯ Yes, on land adjacent to or near the proposed development
⊘ No

b) Designated sites, important habitats or other biodiversity features

◯ Yes, on the development site
◯ Yes, on land adjacent to or near the proposed development
⊘ No

c) Features of geological conservation importance

◯ Yes, on the development site
◯ Yes, on land adjacent to or near the proposed development
⊘ No

Supporting information requirements

Where a development proposal is likely to affect features of biodiversity or geological conservation interest, you will need to submit, with the application, sufficient information and assessments to allow the local planning authority to determine the proposal.

Failure to submit all information required will result in your application being deemed invalid. It will not be considered valid until all information required by the local planning authority has been submitted.

Your local planning authority will be able to advise on the content of any assessments that may be required.

Foul Sewage

Please state how foul sewage is to be disposed of:

☐ Mains sewer
☐ Septic tank
☐ Package treatment plant
☐ Cess pit
☐ Other
☑ Unknown

Are you proposing to connect to the existing drainage system?

◯ Yes
⊘ No
◯ Unknown

Waste Storage and Collection

Do the plans incorporate areas to store and aid the collection of waste?

◯ Yes
⊘ No

Have arrangements been made for the separate storage and collection of recyclable waste?

◯ Yes
⊘ No

Trade Effluent

Does the proposal involve the need to dispose of trade effluents or trade waste?

◯ Yes
⊘ No

Residential/Dwelling Units

Does your proposal include the gain, loss or change of use of residential units?

◯ Yes
⊘ No

All Types of Development: Non-Residential Floorspace

Does your proposal involve the loss, gain or change of use of non-residential floorspace?
Note that 'non-residential' in this context covers all uses except Use Class C3 Dwellinghouses.

◯ Yes
⊘ No

Employment

Are there any existing employees on the site or will the proposed development increase or decrease the number of employees?

◯ Yes
⊘ No

Hours of Opening

Are Hours of Opening relevant to this proposal?

◯ Yes
⊘ No

Industrial or Commercial Processes and Machinery

Does this proposal involve the carrying out of industrial or commercial activities and processes?

◯ Yes
⊘ No

Is the proposal for a waste management development?

◯ Yes
⊘ No

Hazardous Substances

Does the proposal involve the use or storage of Hazardous Substances?

◯ Yes
⊘ No

Site Visit

Can the site be seen from a public road, public footpath, bridleway or other public land?

⊘ Yes
◯ No

If the planning authority needs to make an appointment to carry out a site visit, whom should they contact?

- [x] The agent
- [ ] The applicant
- [ ] Other person

Pre-application Advice

Has assistance or prior advice been sought from the local authority about this application?

- [ ] Yes
- [x] No

Authority Employee/Member

With respect to the Authority, is the applicant and/or agent one of the following:
(a) a member of staff
(b) an elected member
(c) related to a member of staff
(d) related to an elected member

It is an important principle of decision-making that the process is open and transparent.

For the purposes of this question, "related to" means related, by birth or otherwise, closely enough that a fair-minded and informed observer, having considered the facts, would conclude that there was bias on the part of the decision-maker in the Local Planning Authority.

Do any of the above statements apply?

- [ ] Yes
- [x] No

Ownership Certificates and Agricultural Land Declaration

Certificates under Article 14 - Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended)

Please answer the following questions to determine which Certificate of Ownership you need to complete: A, B, C or D.

Is the applicant the sole owner of all the land to which this application relates; and has the applicant been the sole owner for more than 21 days?

- [ ] Yes
- [x] No

Can you give appropriate notice to all the other owners/agricultural tenants? (Select 'Yes' if there are no other owners/agricultural tenants)

- [x] Yes
- [ ] No

Certificate Of Ownership - Certificate B

I certify/ The applicant certifies that:

- [x] **I have/The applicant has given the requisite notice to everyone else (as listed below) who, on the day 21 days before the date of this application, was the owner* and/or agricultural tenant** of any part of the land or building to which this application relates; or**
- [ ] **The applicant is the sole owner of all the land or buildings to which this application relates and there are no other owners* and/or agricultural tenants**.**

*** "owner" is a person with a freehold interest or leasehold interest with at least 7 years left to run.**

**** "agricultural tenant" has the meaning given in section 65(8) of the Town and Country Planning Act 1990**

Owner/Agricultural Tenant

Name of Owner/Agricultural Tenant:
***** REDACTED ******

House name:

Number:

Suffix:

Address line 1:
Shire Hall

Address Line 2:

Town/City:
Gloucester

Postcode:
GL1 2TH

Date notice served (DD/MM/YYYY):
04/07/2022

Person Family Name:

Person Role

- [x] The Applicant
- [ ] The Agent

Title

mr

First Name

Martin

Surname

Brown

Declaration Date

12/07/2022

- [x] Declaration made

Declaration

I / We hereby apply for Full planning permission as described in this form and accompanying plans/drawings and additional information. I / We confirm that, to the best of my/our knowledge, any facts stated are true and accurate and any opinions given are the genuine options of the persons giving them. I / We also accept that: Once submitted, this information will be transmitted to the Local Planning Authority and, once validated by them, be made available as part of a public register and on the authority's website; our system will automatically generate and send you emails in regard to the submission of this application.

- [x] I / We agree to the outlined declaration

Signed

Martin Brown

Date

12/07/2022

Our Ref: GLC-232

Date: 4th July 2022

F.A.O Highways Records
Gloucestershire County Council
Shire Hall
Gloucester
GL1 2TH

BY EMAIL: highwayrecords@gloucestershire.gov.uk

Dear Sir/Madam

INSTALLATION OF A PROPOSED BT STREET HUB AND ASSOCIATEED DISPLAY OF ADVERTISMENT TO BOTH SIDES OF THE UNIT ON FOOTPATH OUTSIDE KINGSHOLM STADIUM, KINGSHOLM ROAD, GLOUCESTER, GL1 3AX

Please find enclosed a Notice informing you that The BT Group Ltd, c/o the agent, will be submitting applications to Gloucester City Council for both full planning and accompanying application for express advertisement consent for the installation of a new generation BT Street Hub unit.

This Notice is provided in accordance with the Town and Country Planning (Development Management Procedure) (England) Order 2015, which requires landowners to be informed of the submission of the application under Article 13 of Applications for Planning Permission as well as express advertisement consent. You will see from the Notice that you may make representations about the application direct to the Local Planning Authority should you wish to do so.

Yours faithfully,

Martin Brown
Senior Planning Manager
01506 721023
m.brown@harlequin-group.com

For and on behalf of BT Group

Harlequin Group Ltd
Rutland House
5 Allen Road
Livingston
West Lothian
EH54 6TQ
T:+44(0)1506 462174
www.harlequin-group.com

Developer's Notice

Proposed development at: Footpath outside Kingsholm Stadium, Kingsholm Road, Gloucester, GL1 3AX

National Grid Reference: Easting 383436 Northing 219146

I hereby give notice, in accordance with Article 13 of *Applications for Planning Permission* of the Town and Country Planning (Development Management Procedure) (England) Order 2015, that **The Harlequin Group on behalf of The BT Group** will be applying to Gloucester City Council for full planning permission and express advertisement consent for:

The installation of a single BT Street Hub and the display an advertisement(s) on internally illuminated digital lcd screen to both sides of the Street Hub unit

The application will be made to:

F.A.O Development Control
Head of Development Control
Gloucester City Council
PO Box 3252
GL1 9FW

The application will be made available for public inspection at the offices of the local planning authority during usual office hours.

Any person who wishes to make representations about the siting and appearance of the proposed development may do so in writing to the local planning authority at the above address. A period of **at least 21 days**, from the date of this notice, will be allowed for any such representations to be received by the Local Planning Authority.

Harlequin Group Ltd
Rutland House
5 Allen Road
Livingston
West Lothian
EH54 6TQ
T:+44(0)1506 462174
www.harlequin-group.com

Name: Martin Brown

Signed: 

On Behalf of: The BT Group

Date: 04/07/2022

Harlequin Group Ltd
Rutland House
5 Allen Road
Livingston
West Lothian
EH54 6TQ
T:+44(0)1506 462174
www.harlequin-group.com

Our Reference: GLC-232

Date: as per submission

F.A.O Development Control
Head of Development Control
Gloucester City Council
PO Box 3252
GL1 9FW

Submitted via Planning Portal

Dear Sir/Madam

APPLICATION FOR FULL PLANNING PERMISSION FOR THE INSTALLATION OF A PROPOSED STREET HUB INSTALLATION ON THE FOOTPATH OUTSIDE KINGSHOLM STADIUM, KINGSHOLM ROAD, GLOUCESTER, GL1 3AX

This application is for full planning in accordance with Article 13 of Applications for Planning Permission of the Town and Country Planning (Development Management Procedure) (England) Order 2015 for the following development on behalf of The BT Group LTD.

This application is part of a planned roll-out of a total of 13No. sites within the Council's area. This application comprises the following:

- Completed Planning Application Forms;
- Location Plan and Site Plan;
- Elevational Details of a Street Hub;
- Photomontage;
- Planning Design & Access Statement;
- Product Statement;
- Anti-Social Behaviour Statement
- FAQ's;
- BT Street Hub Brochure;
- Appropriate fee of £462

Please note that an application for Express Consent to display advertisements on the 2No. LED digital screens located either side of the proposed unit has been submitted separately seeking Advertisement Consent under Regulation 9 to the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (the Regulations)

Harlequin Group Ltd.
Innovation Centre
Maidstone Road
Chatham, Kent ME5 9FD
T: +44(0)163 468 3635
E: reception@harlequin-group.com
www.harlequin-group.com

Should you have any queries relating to this submission then please do not hesitate to contact me directly.

Yours faithfully

Martin Brown
Senior Planning Manager
Direct Dial: 01506 721023
Mobile: 07771933094
E-mail: m.brown@harlequin-group.com

For and on behalf of BT Group plc

Harlequin Group Ltd.
Innovation Centre
Maidstone Road
Chatham, Kent ME5 9FD
T: +44(0)163 468 3635
E: reception@harlequin-group.com
www.harlequin-group.com

DECLARATION OF CONFORMITY WITH ICNIRP PUBLIC EXPOSURE GUIDELINES (“ICNIRP DECLARATION”)

Declares on behalf of BT Wholesale and Ventures that the proposed equipment and installation as detailed below and any existing equipment at:

Site reference: GLC-232

Address: Footpath outside Kingsholm Stadium, Kingsholm Road, Gloucester, GL1 3AX
Easting: 383436 Northing: 219146

is designed to be in full compliance with the requirements of the radio frequency (RF) public exposure guidelines of the International Commission on Non-Ionising Radiation Protection (ICNIRP), as expressed in EU Council recommendation of 12 July 1999* “on the limitation of exposure of the general public to electromagnetic fields (0 Hz to 300 GHz)" in all areas legitimately accessible to the public.
*Reference: 1999/519/EC

Date: 04/07/2022

Signed: 

Name: Christopher Sarkissian

Position: Street Product & Proposition Manager

BT Wholesale
1 Knightrider Street
London
EC4V 5BT

ICNIRP Exclusion Zone

This information pack contains important Health and Safety information relevant to a radio cell station instance. Property Managers should make this pack available to their employees, external contractors and personnel who in the course of their work may come in close proximity to the base station antennas.

Contact Number
For all queries regarding the sites, a telephone line is given for interested parties to call.

Also before any work is conducted and to ensure safe working within the specified antenna exclusion zone, the free phone number should be called in order to turn off the cell.

The cell number, site name and location should be provided as shown on the signage at the site.

Emissions Compliance
BT build of the base stations locations, configuration and position of the antennas is done in such a manner that compliance limit distances (aka exclusion zones) cannot be breached without either illegally climbing onto structure or passing physical barriers.

The site is designed to be compliant with the requirements of the radio frequency (RF) public and occupational exposure guidelines of the International Commission on Non-Ionising Radiation Protection (ICNIRP), as expressed in EU Council recommendation of 12 July 1999 “on the limitation of exposure of the general public to electromagnetic fields (0Hz to 300GHz)”[1].

The compliance takes into account the proposed radio frequency emissions of the equipment and any other operator equipment on this site.

ICNIRP Exposure Limitations
ICNIRP[2] is the International Commission on Non-Ionising Radiation Protection. ICNIRP is recognized by the World Health Organisation (WHO) and the International Labour Organisation as the international independent advisory body for non-ionising radiation protection.

The functions of the Commission are to investigate the hazards of non-Ionising Radiation (NIR), to develop international guidelines on NIR exposure limits and to deal with all aspects of NIR protection.

The guidelines were derived as a result of laboratory and epidemiological studies into the biological effects of electromagnetic fields (EMF). The ICNIRP public exposure guideline is in accordance with the precautionary approach outlined by the Stewart Report (IEGMP)[3].

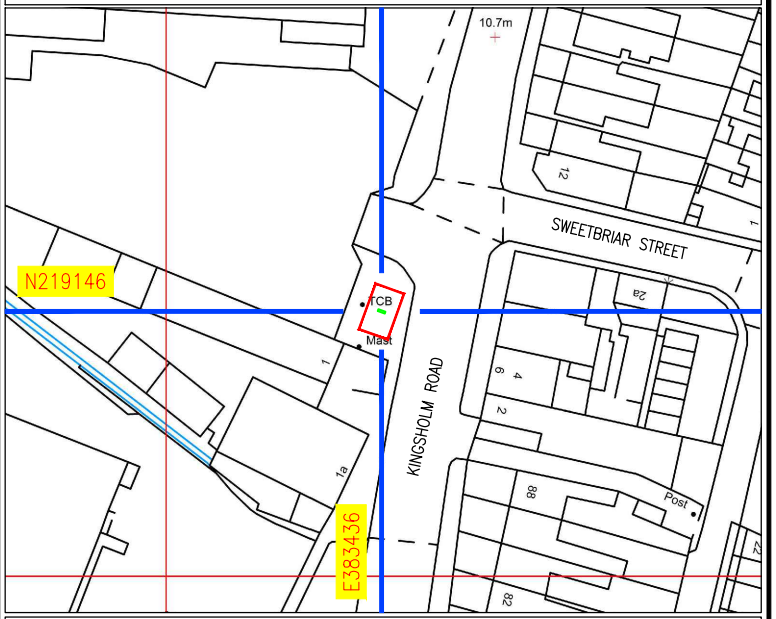
Basic restrictions for power density for frequencies between 10 and 300 GHz

	Power density (W/m^2)	
Exposure	**2-300 GHz**	**0.4-2 GHz**
Occupational	50	f/40
General public	10	f/200

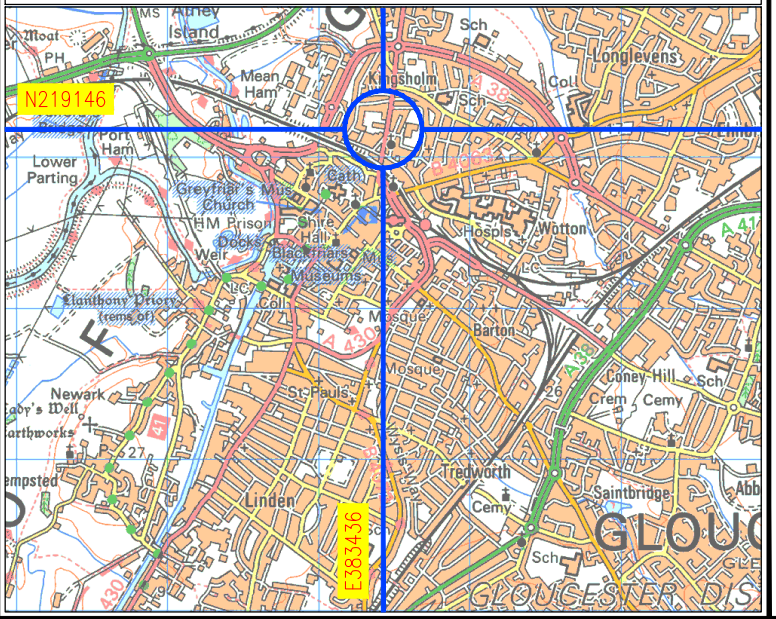
1. where f is in MHz
2. Power densities are to be averaged over any 20 cm^2 of exposed area.

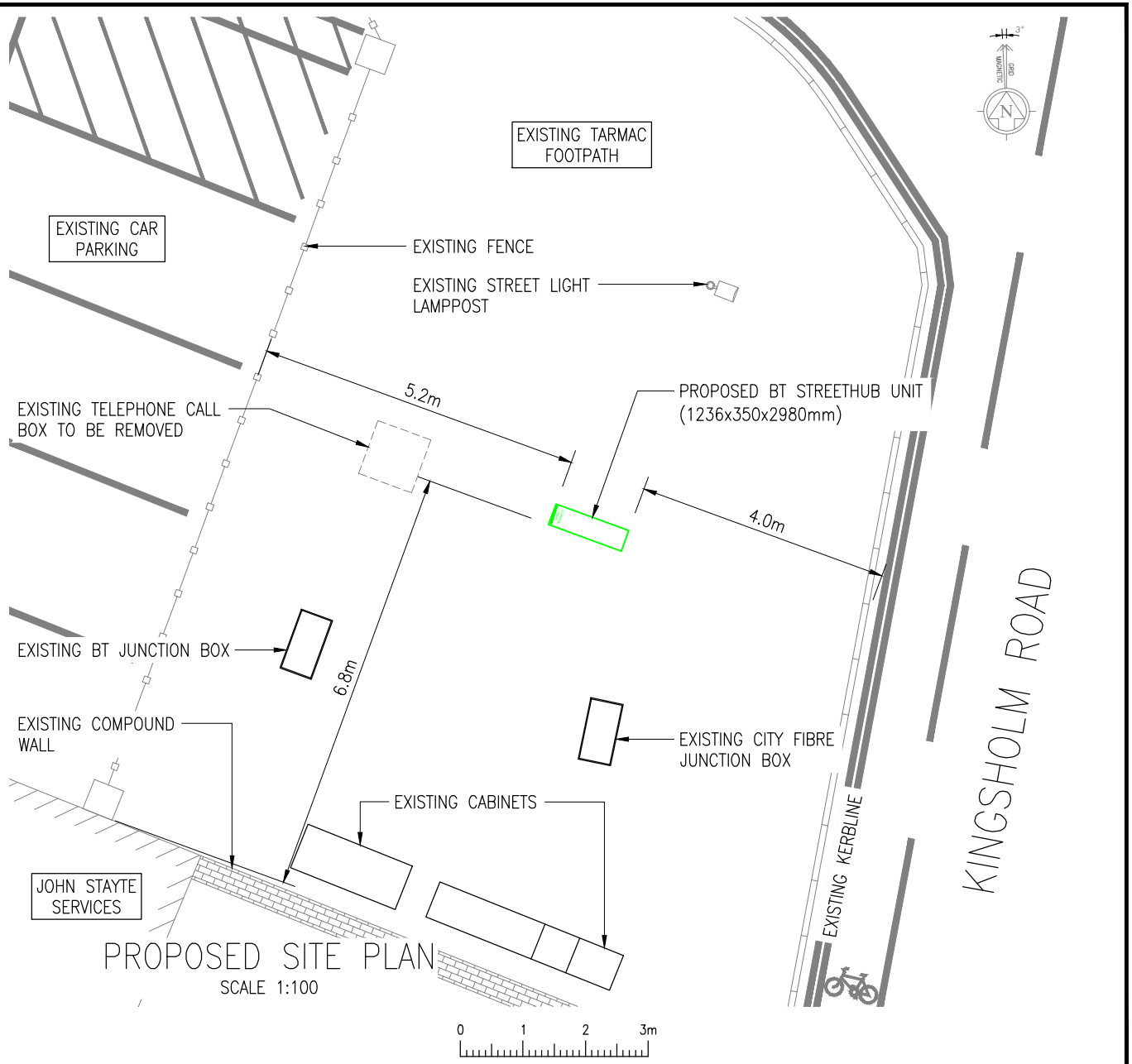
1. Official Journal of the European Communities, “Council Recommendation, of 12 July 1999, on the limitation of exposure of the general public to electromagnetic fields (0 Hz to 300 GHz)”, 1999/519/EC. (Official Journal L 197 of 30 July 1999) (adopted by EU 2010)
2. The full report by the International Commission on Non-Ionising Radiation Protection can be found in its entirety at the following internet web address: http://www.icnirp.de/
3. The Stewart Report entitled “Mobile Phones and Health” was created by the Independent Expert Group on Mobile Phones. It can be found in its entirety at the following internet web address: http://www.iegmp.org.uk/
4. “Guidelines on Limiting Exposure to Non-Ionizing Radiation", by. R. Matthes, J.H. Bernhardt, A.F. McKinlay (eds.) International Commission on Non-Ionizing Radiation Protection 1999, ISBN 3-9804789-6-3.

SITE LOCATION PLAN Scale 1:1250



LOCATION PLAN Scale 1:50000





BT StreetHub

REV	DESCRIPTION	BY	DATE
A	FIRST ISSUE	AGM	15.06.22

SCALE AS SHOWN WHEN PRINTED AT A4	DRAWN	APS	CHECKED	AGM	ALL DIMENSIONS IN METRES U.N.O.
	DATE	13.06.22	DATE	15.06.22	

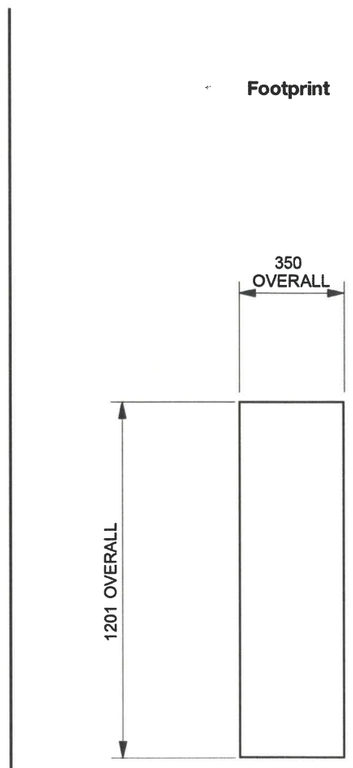
DRAWING TITLE

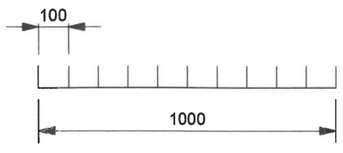
BT STREETHUB
GLC-232

ADDRESS
FOOTPATH OUTSIDE
KINGSHOLM STADIUM
KINGSHOLM ROAD
GLOUCESTER
GL1 3AX

REV A


350
OVERALL
1236 OVERALL
350
OVERALL
1236 OVERALL
2980 OVERALL
2980 OVERALL
BT
#DontCrackUnderPressure
TAGHeuer
global
BT
LIBRE
YVES SAINT LAURENT
THE NEW FRAGRANCE OF FREEDOM
global


Footprint
350
OVERALL
1201 OVERALL


100
1000

SCALE 1:20 @ A3

Street Hubs

Beyond connection

Supporting local councils with digital street communication

This is an interactive document

Contents

Councils face many challenges

In a rapidly changing community landscape, your focus is on the environment, infrastructure and housing. Planning Smart Cities of the future is challenging with extremely limited financial and human resources.

Environment

- Limiting the impact of future plans
- Monitoring air quality and traffic
- Supporting safety, sustainability and the wider environmental agenda.

Infrastructure

- How to support resident activities
- Demands for better broadband
- Reducing street clutter.

Housing

- Tackling the ‘digital divide’
- Increasing Wi-Fi and mobile coverage
- ‘Future-proofing’ cost-effectively.

How can Street Hubs help?

Street Hubs bring councils, communities and citizens wide-scale digital connectivity at no cost – entirely run and installed by BT.

Our street transformation team are moving on from InLink to the next evolution of public connectivity, updating and evolving the payphone estate for today's digitally connected converged-media society.

With 2021 marking the **100th anniversary** of the original K1 kiosk, now is the perfect time to discuss how you can move past limited landline-only infrastructure – not just connection, but moving...

...beyond connection

484 Street Hubs

are already in place, bringing people across the UK together[1]

1. Information sourced from: InLink UK statistics, June 2017 to November 2018

Smarter streets

Ultrafast Wi-Fi and small cell 4G / 5G capabilities bring improved connectivity and digital access to public infrastructure, with mobile infill and real-time information sharing.

Ultrafast Wi-Fi

Full fibre internet allows lightning-fast Wi-Fi connectivity for everyone. Residents, tourists and local businesses can access online services with any internet-capable device, and councils can take advantage of the Internet of Things when improving urban areas.

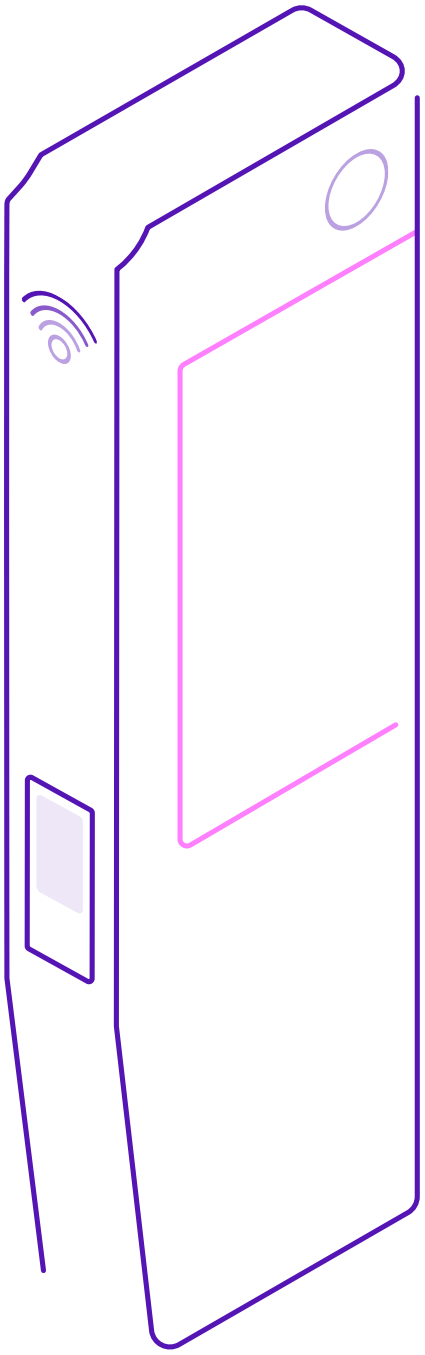
- **Hotspot 2.0** brings universal high-speed internet
- **1Gbps speeds**, the UK's fastest free public Wi-Fi
- **Full fibre** allows speeds up to 13.9 times faster than standard fixed-line home broadband
- **Content filtering** to prevent access to adult-only websites
- **Simple sign up** through a one-time email address registration
- **Automatic connection** whenever user is in range
- **Customer-first policies** – no pop-ups, email addresses are not sold on.

Our leading cybersecurity experts give you guaranteed speed, coverage and quality.

320,000Gb
of free Wi-Fi data[2]

10.5m
Wi-Fi sessions[3]

2, 3. Information sourced from: InLink UK statistics, June 2017 to November 2018



42,800
weekly hours of community content[4]

283m
weekly media plays[5]

Real-time information sharing

Instantly updatable screens for councils to spread important public health and safety messages, as well as updates on council services. Local citizens and businesses benefit from accessible advertising and greater awareness of available services, while tourists enjoy enhanced wayfinding.

- **Two 75" displays** allows free, real-time information sharing in 10-second intervals
- **5% screen time** dedicated to council messaging – 438 hours a year per display, or 876 per unit
- Easy access to and sharing of **local / council services**
- **Digital, always-updated BT phonebook**
- **Live and local weather information and warnings**
- **Maps and wayfinding** – directions to local landmarks and services
- **FAQs and instructions.**

Access for all

Built from the ground-up to be inclusive for more people, removing boundaries for those with disabilities and giving them greater access to council services. Street Hubs helps everyone in towns and cities get in touch with friends, family and local businesses.

- **Two marine-grade waterproof USB ports** featuring Quick Charge 2.0
- **Easy-touch** emergency call button
- **Wheelchair-accessible tablet** (1m height)
- **High-contrast large-type labels** allow easier reading for the vision impaired
- **Relay UK** provides speech-to-text for people with hearing or speech difficulties
- **TalkBack functionality** – text-to-speech for blind/vision impaired users
- **Hearing induction loops** let hearing aid users make calls easily
- **Familiar tablet interface** for frictionless adoption.

We're a trusted partner with an unmatched legacy of innovation and deployment.

The same attention to detail flows through everything we do.

4, 5. Information sourced from: InLink UK statistics, June 2017 to November 2018

Safer streets

Free public digital communication and an evolved payphone estate reduces anti-social behaviour and provides quick and free access to emergency services for everyone.

Free phone calls / dedicated emergency call buttons

Always available national phone calls, completely free of charge, keep communities connected and safe. A dedicated 999 button puts tourists and residents in contact with lifesaving services in just two taps, while councils and businesses benefit from increased contact about services.

- **Free phone calls** to anywhere in the UK (mobile, local or national)
- **No need for handset** – calls use tablet and microphone
- **Caller privacy** offered by headphone jack
- **Directional speaker** and **noise-cancelling microphone** offer call clarity and quality
- **Dedicated 999 call button** that automatically shares location
- **Anti-accident** two-touch emergency call implementation.

Public messaging and connectivity

Each unit expands mobile network coverage with 5G enablement, allowing councils a cost-effective and mast-free method of meeting the demands of their digitally-connected citizens and ensuring better access to public health resources and emergency messaging / contacts.

- **Small cell infill coverage** gives your streets greater mobile connectivity
- **5G enablement** for lightning-fast data downloads
- **Screens controlled dynamically** – emergency messaging can be displayed, with unique instructions on each unit / screen
- **Public health / community / emergency messaging** with remote upload control
- **Access to public health services and emergency contacts.**

We'll work with you to bring more positive changes like this to your streets.

Only we bring thecapability to upgrade your payphone estate to offer publicly available digital communication.

2.2m
free calls made in 2018[6]

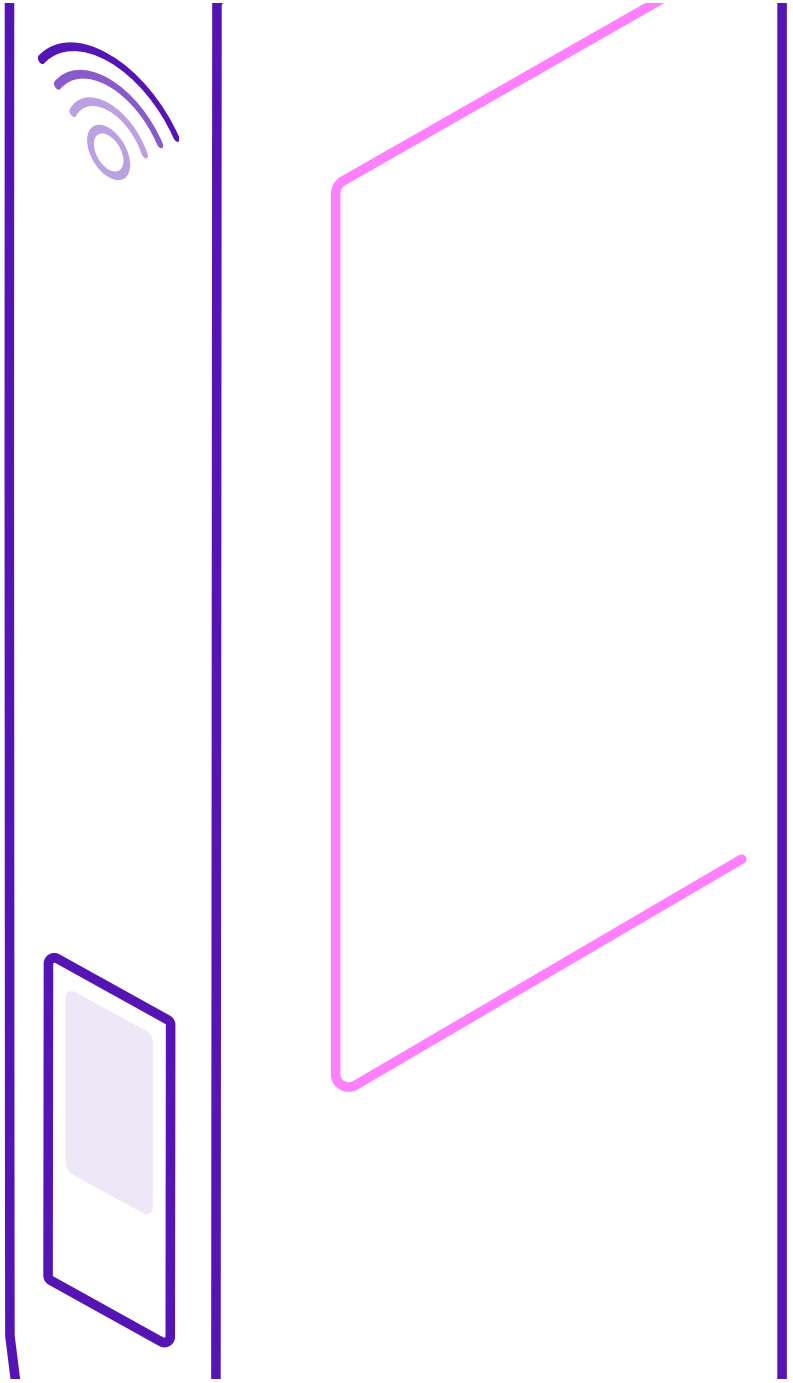
6. Information sourced from: InLink UK statistics, June 2017 to November 2018

Health and safety

Sensors inside each unit and regular inspections by BT staff ensure Street Hubs continue to serve local communities. Various measures against anti-social behaviour and misuse keep the units as a positive contribution to the areas they're in, and spare councils from liability.

- **Inspected weekly**, tested and cleaned at least every two weeks
- **Monitored 24/7** by sensors in unit
- **Operated in accordance with Street Hub Anti-Social Behaviour Management Plan** – developed with the police and local authorities
- **Automatic anti-social call blocking**, identifying suspicious call patterns and phone numbers and blocking across network
- **One-touch connection to four national charities**
- **Session timeout** after 30 seconds, securely wiping all user sessions
- **Ring-fenced system** does not allow open web browsing
- **No incoming calls** prevents 'prank calling'
- **Power-only USB ports** to avoid tampering.

We're configuring infrastructure to make streets safer places for citizens and businesses.



1.5m
tablet sessions[7]

438 hours
per year, per screen for free council advertising / messaging space[8]

7, 8. Information sourced from: InLink UK statistics, June 2017 to November 2018

Sustainable streets

Reduced street clutter, environmental air, noise and traffic monitoring, and future-ready infrastructure providing a safer and more connected environment now and in the years to come.

Economic design

The sleek, modern and sturdy design of Street Hubs beautifies urban areas and funds removal of existing outdated kiosks. Councils get more street-space to make use of, and communities and businesses can enjoy the improved aesthetics of the areas they live and work in.

- **A quarter the footprint (0.42m²) of a phone box**, reducing street clutter
- Small profile – **35cm deep, 124cm wide, 298cm high**
- **Funds removal of two BT payphone kiosks**, giving back 1.78m for each installation
- **High-quality materials** hold up to abuse, vandalism and wear-and-tear
- **Reduced glare** with displays fronted by tempered and laminated glass
  - Galvanised mild steel structure, powder coated external grade aluminium exterior
  - Painted powder-coated aluminium main casing – attractive, durable, easy to service, and cooling
  - RF transparent radio compartment
- **Modular design of exterior / interior** for simple replacement
- **No handset**, which was frequently vandalised.

Energy saving

Every unit is designed to be efficient to run, powered by renewable energy and built with high-quality parts to optimise up-time and lower running costs, giving councils maximum service with minimal friction. Councils and businesses benefit from enhanced insights, while communities enjoy anti-light pollution measures and ethical energy usage.

- **100% renewable carbon-free energy**
- **Automatic screen dimming** based on daylight hours, down to 600cd/m2 in accordance with guidelines from Institute of *Lighting Professionals, Professional Lighting Guide 05: The Brightness of Illuminated Advertisements*
- **State-of-the-art LED-backlit LCD screen** consumes less power
- **Industrial-grade components** lower the need for cooling
- **High-efficiency power supplies** – 80% compared to a typical 65-70%
- **Integrated operating system / dashboard** gives quick access to insights.

We're the perfect partner to deliver positive change.

296m²
of pavement space de-cluttered[9]

A unique opportunity to incorporate historic red phone boxes and the digital future.

9. Information sourced from: InLink UK statistics, June 2017 to November 2018

We're building smarter, safer, more sustainable public infrastructure.

Smart City enablement

Street Hubs can house equipment to make smarter towns and cities a reality, from optional equipment to monitor various types of pollution to traffic management and more. Our team are happy to work with you to determine which features would best help you realise your vision for your town or city.

- **Air quality:** continuous air quality assessment feeds to central control for monitoring of **NO, NO_2** and **CO_2** (Nitric Oxide, Nitrogen Dioxide and Carbon Dioxide)
- **Possible future measurement** of Ground Ozone Level (O_3), PM10 and PM2.5 particles, and Sulphur Dioxide (SO_2)
- **Noise pollution:** environmental sensors monitor noise levels 24/7
- **Speaker volume auto-lowers** at night, except for emergency calls
- **Temperature monitoring** helps pavement maintenance planning / public health advice
- **Pedestrian, bike and vehicle counting**
- **Smart City planning** key waypoint
- **Insight into your streets** with in-built sensors
- **High-speed electric vehicle charging points**
- **Upgradable without street works** (e.g. 1Gbps to 10Gbps).

COVID-19 and beyond

Millions of people in UK towns and cities saw public health information during the pandemic, thanks to the street transformation team's support of three key information initiatives.

Public Health England Campaign (PHE)

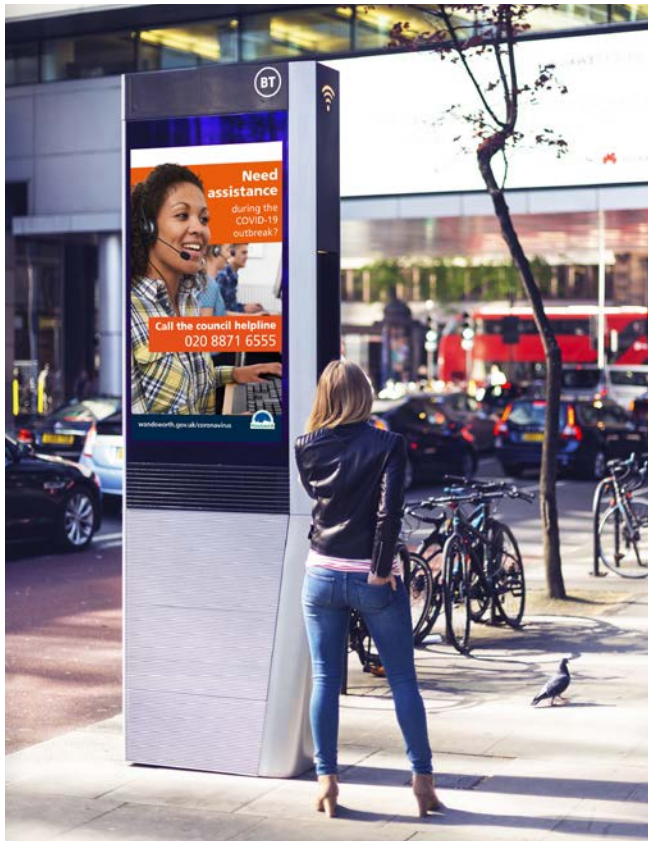
We **doubled screen time** for the PHE Stay at Home campaign, regularly updating guidelines into short, digestible snippets on Street Hubs across the UK.

Local Council Support

We **collaborated with local councils** to offer support for localised messaging.

London Mayor's Office (GLC)

We supported GLC messaging for consistent communication across **14 London boroughs** with the **Stay at Home** and **London Together** campaigns.



Beyond the coronavirus, we helped Maida Vale and Ealing save millions of pounds, offering residents and visitors free 1Gbps Wi-Fi, free calls, and decluttered pavements, at no cost to them. We also supported the police in Camden Town, reducing mobile phone thefts.

Maida Vale

- Estimated **£4.8m over 10 years** to install a fibre optic Wi-Fi network
- Expected to offer **86,000 free calls a year worth £62,000.**

Ealing

- Estimated **£4m over 10 years** to install a fibre optic Wi-Fi network
- **25 Street Hubs** expected to offer 100,000 free calls worth £60,000
- 50 glass payphones removed creating **44m of pavement space** – enough for:
  - **32 trees**
  - **65 bicycle parking spaces.**

Camden Town

- **Partnered with police** in north London to tackle phone snatchers on mopeds
- **Personalised content** created with local figures to raise awareness in key areas
- **Significant reduction in thefts** over the course of the campaign
- **Similar content** used to encourage Neighbourhood Watch participation.

Offices Worldwide

February 2021

Street Hubs
Beyond connection

Supporting local councils with
digital street communication

Street Hub product statement

v1.0 | February 2021

Table of contents

Beyond connection

BT is moving public connectivity forward. We're evolving the payphone estate further with a move from InLink to Street Hubs, a sleek modern answer to the demands of a digitally connected, converged-media society.

Councils across the UK used the InLink units to meet key challenges head-on, upgrading local infrastructure, tackling the digital divide, and freeing the high street from unnecessary furniture.

With Street Hubs, we're further transforming the payphone estate – it brings all the existing benefits of InLink but with 75" screens, better Wi-Fi range, environmental monitoring and expanded mobile network coverage with 5G enablement.

We're making streets smarter, with ultrafast Wi-Fi, public messaging and better mobile connectivity. We're making them safer, with ready access to public and emergency services. And we're making them more sustainable, with sensors allowing for 'smart city' planning and reduced street clutter.

Serve your citizens and gain greater insights into your streets for targeted improvements – all at no extra cost.

What is a Street Hub?

Street Hubs are free to use, fully accessible community assets connecting and improving local streets in urban areas. At no cost to taxpayers or end users, Street Hubs provide communities with an unprecedented suite of essential urban tools:

- **Ultrafast public and encrypted Wi-Fi**
- **Access to public services**
- **Multiple accessibility options**
- Powered by **100% renewable carbon-free energy**
- **Inspected weekly and cleaned at least every two weeks**, monitored 24/7
- Secure power-only USB ports for **rapid device charging**
- **Free phone calls**
- **Direct 999 call button**
- **Display community and emergency** (i.e. police) awareness messaging
- **Environmental sensors** to measure air quality, noise, traffic and more.

Contributing to the community

We are committed to ensuring that Street Hubs make a positive contribution to the public realm as well as the communities they are in.

- With a **footprint of just 0.42m²** Street Hubs are smaller than comparable street furniture, and their installation facilitates and **funds the removal of up to two existing BT payphone kiosks**, giving back 1.58m for each installation
- **876 hours of free council advertising** per unit per year
- Direct **access to charities** through the use of the dedicated charity icon on the fully accessible interactive tablet
- **Community notice board** with over 1,000 hours of content per year – the Street Hub team can work with local groups to promote events and activities
- **Discount advertising for local business groups** (such as BIDs and Chambers of Commerce) and their members through our Street Hub Partners Programme
- Business rates for each location are paid when requested by the council, ensuring Street Hubs **make an ongoing financial contribution to the local area.**

Community feedback

Street Hubs are helping to improve streets and public spaces across the UK, as well as helping to better connect local communities.

"We have always been a city with an eye for opportunity and believe the range of free services the InLinks provide is a significant contribution to the Greater Manchester Digital Strategy. As a city, we plan to continue to encourage and support digital innovation which strengthens businesses and investment."

[redacted]
Leader of Manchester City Council

"By providing facilities for people to make free calls, access free WiFi and information and charge their phones, we move one step closer to becoming an attractive modern city where people are proud to live and work."

[redacted]
Leader of Southampton City Council and Cabinet Member for Clean Growth & Development

"We're delighted to be on InLinks. At Childline we're always looking at new ways to increase our reach and help as many young people as we possibly can."

[redacted]
National Services Communications Manager for Childline

Our approach

Our approach to planning is to be collaborative with councils wherever possible, working closely with relevant stakeholders to identify suitable sites for Street Hubs and to select which payphones are to be removed.

Once the appropriate permissions have been gained we progress with removals and installations with the minimal possible disruption to residents and businesses.

Activation is as automated as possible to minimise the time our engineers spend setting-up and checking the units are ready for service.

We welcome the opportunity to collaborate on all stages of the rollout in an area wherever possible.

Street Hub design and specifications

Street Hubs are free-standing structures featuring a fully accessible tablet interface and digital HD display screens on two sides. Overall Street Hub dimensions are 35cm deep and 123.6cm wide (reduced tapered footprint is 120.1cm), with a height of 298cm to maximise the Wi-Fi range without dominating the street. A narrow base limits the footprint while ensuring access to wheelchair users.

The screens display content at 10-second intervals, both the commercial content that funds the service as well as a wide range of local community and council content.

The two screens automatically dim at night to 600cd/m2, following daylight hours and in accordance with the levels set for this type and size of screen (those under 10m) by the Institute of Lighting Professionals, Professional Lighting Guide 05 2015:

The Brightness of Illuminated Advertisements.

This minimises disturbances to residents in the evening.

There is a video camera above each screen, as well as built into the tablet. These are not currently connected or used in the UK but are ready to deliver community benefits, after consultation and notifying the public and stakeholders through multiple channels.

Accessible for all types of users

Street Hubs have been designed to be accessible to all users, regardless of their physical or technological capabilities, including:

- Tablet interface placed at 1m to provide easy access for wheelchair users
- Easy-touch 999 call button to ensure it can be used regardless of mobility restriction
- High-contrast large type labels
- TalkBack functionality facilitates full access to the tablet for all users
- Hearing induction loops integrated into each unit
- Intuitive touch screen interface.

Next Generation Text Relay makes Street Hubs even more accessible to those who are deaf, hard-of-hearing or speech impaired. Using the tablet callers can type words for a Relay Assistant to then speak to the call recipient. The Relay Assistant types back any responses to the caller, allowing for an effective two-way conversation.

Our Wi-Fi in detail

Street Hubs connect their communities to the fastest and most robust free public Wi-Fi service in the UK, 1Gbps within 150m. Full fibre connectivity enables speeds up to 13.9[1] times faster than standard fixed line home broadband and can handle large numbers of connected users without any reduction in speed.

An omnidirectional outdoor Wi-Fi access point at the top of each Street Hub is connected directly to the fibre broadband network, with co-channel interference mitigated by directing Wi-Fi signals away from neighbouring access points. Our full fibre solution allows capacity upgrades by orders of magnitude (e.g. 1Gbps to 10Gbps) without street works.

Signing up is simple – a one-time email address registration allows automatic connection whenever a user is in range of an active Street Hub. Our customer-first policy means we don't sell email addresses on, and have no pop-up adverts when users reconnect. Content filtering also prohibits access to adults-only websites.

Where a 'superconnected cities' public Wi-Fi service is already provided to the council by BT, this signal can also be broadcast from all Street Hubs in that city at no additional charge.

Interactive tablet

Every Street Hub includes a fully accessible interactive tablet that provides a series of icons that give users access to:

- Local council services
- One touch connection to four national charities for support
- BT's phone book
- Local weather information
- Maps and wayfinding
- FAQs and instructions.

Sessions timeout after 30 seconds of inactivity or when selected, wiping all user sessions clean. The ring-fenced system **does not allow open web browsing.**

[1] May 2020 figures revealed that the average fixed line internet download rate is now 71.8 Mbit/s (up 7.8 Mbit/s in November 2019) – Ofcom's annual study of fixed line home broadband ISP speeds across the United Kingdom.

Free calls for everyone

Street Hubs allow users to make free calls using two different methods:

- **Directional speaker and built-in microphone**, with noise-cancelling technology and adjustable volume allowing calls to rival a traditional handset in clarity and quality
- **Plugging in a standard headset or earphones** into the built-in headphone jack.

Calls aren't time-limited, but almost all have lasted no more than a few minutes as people use them to call friends, family, local services, taxis, etc.

The tablet and speaker are set back and sheltered from the sides, allowing privacy for personal communications. In addition, **the speaker volume is automatically reduced at night** (except for emergency calls).

Unlike payphones, Street Hubs don't include or need a handset, nor accept incoming calls.

Providing capacity and mobile coverage with small cells

Small cell mobile infill meets the increasing demand for connectivity in the UK, particularly useful in busy urban areas where it's needed most and installing mobile antennae is difficult.

Street Hubs boost 4G and 5G with installed small cells, improving coverage and capacity. Residents, local businesses and visitors get a fast, reliable connection for calls and internet access. Your citizens can enjoy mobile gaming, virtual reality and video streams wherever they are.

Secure fast charging

Two marine grade, waterproof USB ports with Quick Charge 2.0 connected directly to a power source. They cannot exchange data.

These are compatible with all mobile devices, but **also support the next generation of phones** with 20x the charging speed, a great service to tourists and those in an emergency.

Maps and wayfinding

Every Street Hub provides access to maps giving directions to nearby landmarks and services – a valuable resource for visitors or those without access to a smartphone.

They also act as wayfinding boards, giving walkers and cyclists clear directions.

Local advertisers are encouraged to give simple directions to their businesses.

Useful real-time information

We are currently running real-time information from a range of sources, including local weather and transport information. LBC content displayed on the unit shares up-to-the-minute news with local communities, enhancing the outdoor experience.

In the future we're looking to create relevant community content with open APIs. Similarly, we happily work with local authorities, transport providers, and others to determine what real-time information is most useful to the area and how it can be integrated.

For example, in London we display real-time Transport for London (TfL) tube status information. We're also working with TfL to explore how to incorporate other transport information to help people get around the city.

A platform for community and council content

The rotating content on each Street Hub includes a ring-fenced allocation for community content provided by the local council and community.

Each local authority is provided with 5% of screen time on each Street Hub to promote and educate, equivalent to 876 hours per unit or 438 hours per screen.

This content would be scheduled and (where needed) developed in partnership with BT and Global, and can tell residents and visitors about local services, local events and news, as well as warnings and public notices.

Street Hubs designers also create 'house content' throughout the year relating to key events and holidays. Recent examples include supporting the local council elections through encouraging residents to register to vote, free events during school holidays, London Pride, Black History Month and a diverse editorial calendar throughout the year, supporting our vision for a 21st century community noticeboard.

Street Hubs are more than an advertising screen – they're a key point of reference for local information and **an asset to the community.**

Advertising for businesses of all sizes

Street Hubs represent **the latest in advertising platforms** – an affordable, accessible digital advertising solution that specifically targets Street Hubs close to small businesses.

The Global sales team (responsible for all 'paid for' messaging on Street Hub screens) is set up to **work in partnership** with small and medium-sized enterprises, letting them use the screens to reach audiences and drive business growth.

This advertising revenue lets us provide all our services free of charge, and further rollout of Street Hubs.

Our Global team have increased the accessibility of Street Hubs in two ways:

Programmatic connection

Global have connected Street Hub to DAX, their programmatic platform. This allows Demand Side Platforms (DSPs) to purchase individual ad slots automatically.

Automated scheduling

Global are connecting the scheduling of Street Hub directly to their inhouse booking system. This allows key business partners who use API-enabled platforms to easily book and execute complex and flexible schedules.

Global's award-winning Data Planning team manages G-IQ, a data management platform that is used to ingest first and third-party data to prove the efficacy of our products and the value of the audience. Using trusted data sources and intelligent mapping tools we can plan effective campaigns.

Their unique position as a media owner of channels like Outdoor, Radio and Online allows for more creative scope. For example, it's seen innovative multiple-media campaigns deliver both digital Outdoor messaging in sync with Radio commercials.

Content standards

Street Hubs are funded through the display of advertising in conjunction with other council and community content.

Our Global team coordinate with advertisers, brands and specialists on commercial content, guided by:

- Committee of Advertising Practice (CAP) Code of Practice
- Guidance for Digital Roadside
- Advertising and Proposed Best Practice from Transport for London
- Non Broadcast Advertising and Direct Promotional Marketing (CAP) Self Regulation Guidelines
- and resources from other authorities as necessary.

For full specifications of our screens please refer to page 15, 'Digital Display Screen Technical Specification'.

Safer communities

Every Street Hub includes a direct **999 call button** that **automatically shares its location** with the authorities, improving safety in an area and helping in the reporting of crime and disorder.

A two-push approach reduces the chance of accidental calls, with a voice prompting users to push the button a second time to confirm.

Street Hubs can also support campaigns with local police and other authorities. For more information see the communities section.

Emergency messaging

Back-end systems allow us to control screens dynamically through our head office. Groups such as the police can quickly display emergency and community awareness messaging – see our case study from Camden for an example.

In the event of an emergency or major event, regular content can be replaced with urgent, useful messaging alerting the public to major incidents and offering advice.

As each Street Hub is addressable, we can give specific instructions on individual screens steering people away from a particular area or providing alternatives to travel.

Combating anti-social behaviour

Street Hubs are operated in accordance with the Street Hub Anti-Social Behaviour Management Plan that was developed with assistance from the police and a number of local authorities.

Automatic anti-social call blocking technology uses anonymised data to identify suspicious call patterns and phone numbers. Identified numbers are blocked on Street Hubs across the UK, while still allowing genuine users to benefit from the free phone call service.

Depending on circumstances, other measures can be taken including further reducing call volumes, restricting calls at certain times, or only allowing headset calls.

Recommendations from groups like the police may mean quicker implementation of measures, for example temporarily restricting mobile calls where a Street Hub has been misused to buy illegal drugs. Subject to internal processes, the police can 'whitelist' a specific number where there is an operational need, i.e. involved in an active investigation.

People can contact StreetHub@bt.com to report technical issues, antisocial behaviour involving a Street Hub, or to claim their number has been flagged in error. Their case will be considered in consultation with the police and local council where appropriate. This option will be highlighted on the screen when a call is attempted to a restricted number. Emails sent from police.uk or .gov email addresses will be treated as a priority.

Should it not be possible or convenient to send an email, it's possible to call the Street Hub helpline on 0800661610 (open 24 hours 7 days).

As BT is designated by OFCOM as a Universal Service Provider of public call boxes, any decision to restrict phone service will need to be made exclusively by BT. Decisions to change any service will be based on details provided by police and local authorities:

- A description of the issue and when it occurred / occurs
- Location of the Street Hub(s) involved and how they contributed.

Changes will be viewed as temporary (typically 3 months, or 12 in high-risk areas) and reviewed later.

Environmental performance

All Street Hubs are **powered by 100% renewable carbon-free energy**, with energy efficiency prioritised throughout the design process.

- A state-of-the-art LED-backlit LCD screen that consumes approximately 60% less power than Cold Cathode Fluorescent Tubes
- Screen filters reflect light reducing the need for high power, noisy cooling systems typically seen in competing solutions
- Industrial-grade components designed to function at high temperatures lower the need for cooling without compromising performance
- Passive design for cooling, i.e. aluminium casing for better thermal dissipation
- High-efficiency power supplies providing 80% or better efficiency, compared to 65-70% of typical components.
- Noise from cabinet and equipment should not exceed: 41dB at a distance of 3 metres during day, 35 dB at a distance of 3 metres during night, Operational volume should not exceed 60dB at a distance of 1 metre.

Air quality monitoring

Across the UK, we're trialling air quality monitoring equipment within Street Hubs. The information from these sensors could be used by participating (and interested) councils and researchers to complement other data sources and improve local decision making.

Councils adopting Street Hub are invited to express interest in being involved in this trial. Feedback from participants will guide how the data is communicated and used.

Initially, we're looking at the potential measurement of the following elements of air pollution:

- Carbon Monoxide (CO)
- Nitrogen Dioxide (NO2)
- Nitric Oxide (NO).

Further work is being undertaken on the possible measurement of:

- Ground Ozone Level (O3)
- Particles (PM10)
- Particles (PM2.5)
- Sulphur Dioxide (SO2).

Measurement for each of the above are being assessed on their individual merits, and a decision of which to include in a given Street Hub and when has not yet been made.

"We are excited to be working with BT to equip their street furniture with our innovative technology to monitor and reduce carbon emissions. This will help local authorities monitor their carbon footprint in real-time, identify the best opportunities to cut emissions, and access new funding for the necessary investments. At scale, the UK could become the first nation to continuously monitor carbon emissions over its entire territory. This would boost its goal of net zero by 2050."

[redacted]
CEO of Everimpact

Additional smart city sensors and data collection for community benefit

Street Hubs collect and display useful, real-time data and insights from communities to help government officials and local decision makers get more from the space around them.

As with the air quality trial highlighted above, the modular nature of Street Hubs lets us improve, evaluate and invest in tools and techniques to collect meaningful insights, i.e.:

- Counting pedestrian numbers
- Measuring traffic congestion
- Bike and vehicle counting
- Environmental factors like sound and light.

Continued investment allows 'smart cities' to improve public well-being and health with data. This kind of **data is most powerful when shared**, so we would look to make these insights available to communities as permitted by law and within our Privacy Notice and Terms of Use.

Installing a Street Hub

Several steps are involved in the installation of a Street Hub once approval is obtained from the relevant local authority:

1. **Preparation works**
   Before work starts each site is surveyed to identify services and other underground infrastructure (e.g. water or gas pipes) so our teams do not disrupt services.
2. **Safety comes first**
   Our deployment teams will set up barriers to restrict access to the work area. These are based on permits obtained from the local authority.
3. **Payphone removals**
   Street Hubs are often installed on the same location as an existing BT payphone so the first works you may see are teams disconnecting and removing existing kiosks.
4. **Preparation of foundations**
   Each Street Hub sits on a metal base plate, part of a concrete foundation, 30-40cm below ground level with ducting to allow connection to fibre and power. It's designed to easily withstand being pushed by individuals or high winds, and fall slowly if struck by a vehicle – with internal sensors notifying us of the event.
5. **Connecting services**
   Power is connected by the Distribution Network Operator (DNO). Fibre is connected by Openreach. Both may need ducting run from nearby infrastructure, such as broadband cabinets. The teams responsible for this work will typically receive work permits from the local authority in accordance with an area identified at survey.
6. **Lifting the Street Hub into place**
   Each Street Hub is typically lifted by small crane from a flatbed truck onto the metal baseplate about 1-3 days after the building of the foundation. At this time any remaining barriers are removed.
7. **Connecting services**
   Once installed, our engineering teams do the necessary testing and configuration to go live – typically within two weeks of installation, but sometimes longer.

Materials

Maintainability and durability were key considerations in the design, with regular cleaning and servicing planned – please see 'Management, maintenance and operational strategy' section below. High-quality materials ensure longevity, holding up to abuse and diminishing scratches.

- Galvanised mild steel structure, powder coated external grade aluminium exterior
- Painted powder coated aluminium main casing – attractive, durable, easy to service, and cooling
- Displays fronted by tempered and laminated glass to reduce glare
- RF transparent radio compartment

The modular design of exterior and interior components makes servicing simple and economical.

Digital display screen technical specification

The technical specification of the two digital display screens are as follows.

Screen Panel Type:	LCD
Screen Dimensions:	95cm wide x 167cm high (75 inch in portrait)
Screen Area:	**1.586m²**
Resolution:	3840 x 2160 UHD
Maximum Daytime Brightness:	2500 cd/m² (Typ.)
Maximum Night-time Brightness:	**600 cd/m2 (Typ.)**
Contrast Ratio:	1200:1 (Typ.)
Display Colours:	10bit (D) 1.07 Billion Colours
Viewing Angle:	178/178 degrees
Lamp Type:	LED
Operating Temperature:	0~50°C
Sunlight Readable:	Yes

The proposed usage for the screens has been set in accordance with Transport for London's (TfL) policy document 'Guidance for Digital Roadside Advertising and Proposed Best Practice – 2013'.

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 are 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 eyeline 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.

Management, maintenance, and operational strategy

BT is responsible for the management of Street Hub services with each unit physically inspected weekly across the estate.

Inspection regimes

The Street Hubs are visited every two weeks for cleaning, by hand and with pressure washers. The materials used make this process easy with defined materials and processes. Whilst cleaners are on site, they check for damage and ensure the tablets and screens are working.

In addition, our in-field quality inspection teams visit at least every two weeks on an alternative schedule to our cleaning team, performing several checks including (but not limited to):

- Full walk-around with supporting photos to check for damage, graffiti and black screens
- Functionality checks on the tablet to test calls, maps, 999 and USB charging.

We can also send out emergency visits if reported as necessary by internal sensors.

Monitoring and repair management

Street Hubs are monitored remotely 24/7, our primary mechanism to spot faults with the above local inspections ensuring the effectiveness of this monitoring.

Once identified, we have processes to resolve issues within agreed service levels. Most will be resolved within three working days, with safety and power issues having a more rapid resolution target than cosmetic issues like graffiti.

Future upgrades

We plan to make changes as needed to address identified faults or to improve services. Whilst some may involve physical attendance at the unit, the majority will be done remotely via software upgrades. All updates are rigorously quality assured before release.

Appendices

The below case studies are from implementation of the current InLink units. With the improved functionality of Street Hubs, we would expect greater results across a larger number of areas, e.g. environmental protection and traffic monitoring with the additional sensors.

Case study

COVID-19 messaging

Millions of people in UK towns and cities saw public health information during the pandemic, thanks to the street transformation team's support of three key information initiatives.

Public Health England campaign (PHE)

We **doubled screen time** for the PHE Stay at Home campaign, regularly updating guidelines into short, digestible snippets on Street Hubs across the UK.

Local council support

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London Mayor's Office (GLC)

We supported GLC messaging for consistent communication across **14 London boroughs** with the **Stay at Home** and **London Together** campaigns.

Case study

Restoring pavements across the UK

Brixton is a key transport interchange, entertainment and shopping precinct, and civic centre in south London. This role means in the past there was strong demand for payphones with many previously provided by BT still in the area.

The InLink on Coldharbour Lane opposite the Town Hall has replaced existing payphones that were associated with a range of anti-social activities.

On this site we reclaimed 3.78m^2 of pavement space for the community, allowing for the future expansion of nearby bicycle parking racks.

Before

After

Case study

Working with local police

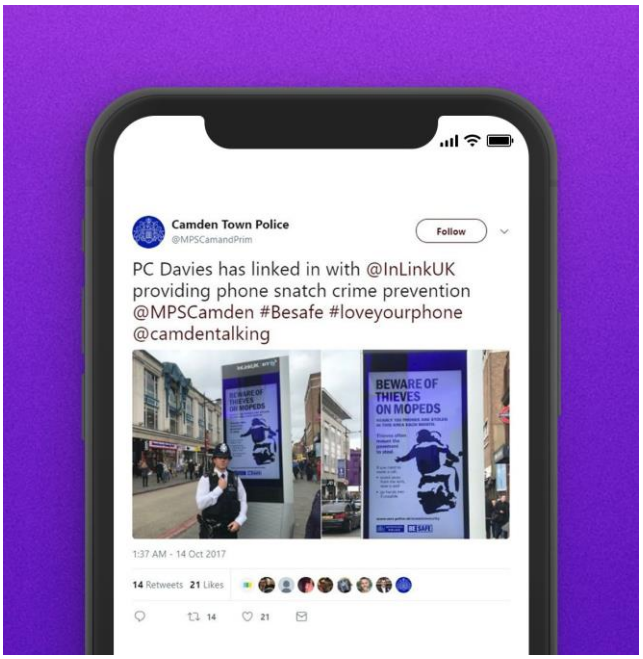
The InLinkUK team partnered with the Camden Town Police in north London to help raise awareness of the threat posed by phone snatchers on mopeds.

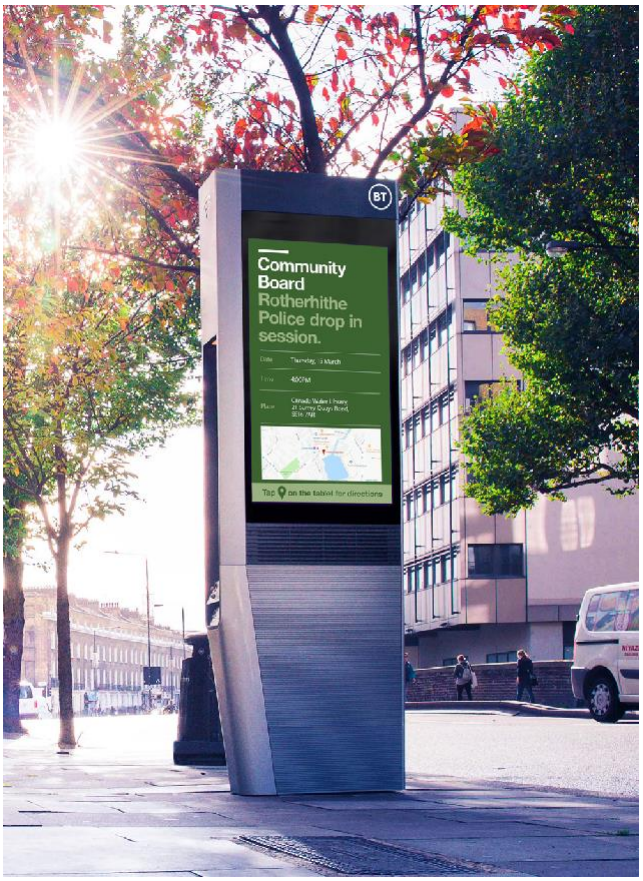
Content was created for the campaign and included on InLinks in the Camden area, as seen on this one with PC Davies just by Camden Town Tube.

Over the course of the campaign there was a significant reduction in the number of phones reported stolen. Our team is now looking to roll this and similar campaigns out in other areas.

InLinks have also been used to promote local neighbourhood meetings, such as the example shown here from a trial with the Safer Neighbourhood team in the London Borough of Southwark.

Similar content was shown on screens in the specific ward area to help raise awareness among the local community and to encourage those interested to attend.





Case study

Supporting democracy

As local community infrastructure each InLink can act as a local notice board for its area, with this functionality proving particularly useful in the lead up to and during elections.

During the 2018 local government elections InLink screens throughout the UK encouraged voters check and update their voter registrations.

Screens were also used to promote government campaigns against voter intimidation, including this example from the London Borough of Tower Hamlets in conjunction with CrimeStoppers and the Electoral Commission that was presented in a range of different languages.

Case study

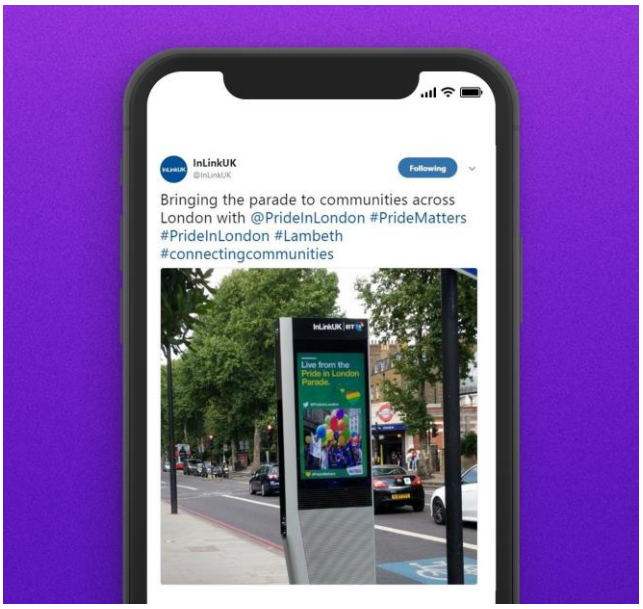
Live content from London Pride

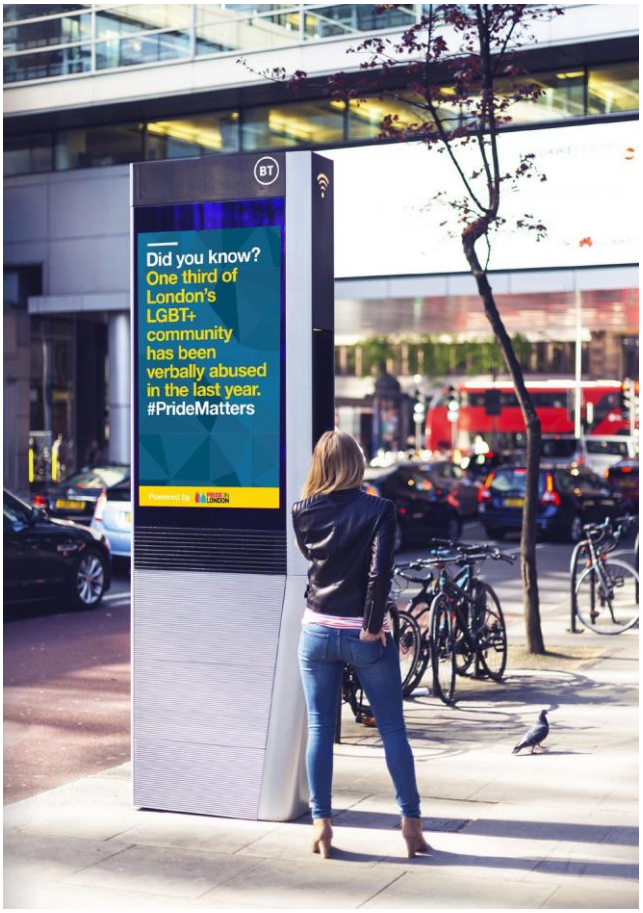
In 2018 InLinkUK were an official media partner for Pride in London with the InLink screens used in the lead up to and during major events to highlight the occasion.

Ahead of the major events, creative content was displayed to promote Pride Month across the entire InLink estate in the UK.

A range of special 'Did you know?' facts were also shown on InLink screens throughout London highlighting the challenges still faced by the LGBT+ community and the work of volunteers delivering Pride in London.

An estimated 30,000 people took part in the Pride March and more than one million came into the city to watch in person, with those in other parts of London able to see highlights that were being shown on the InLink screens.





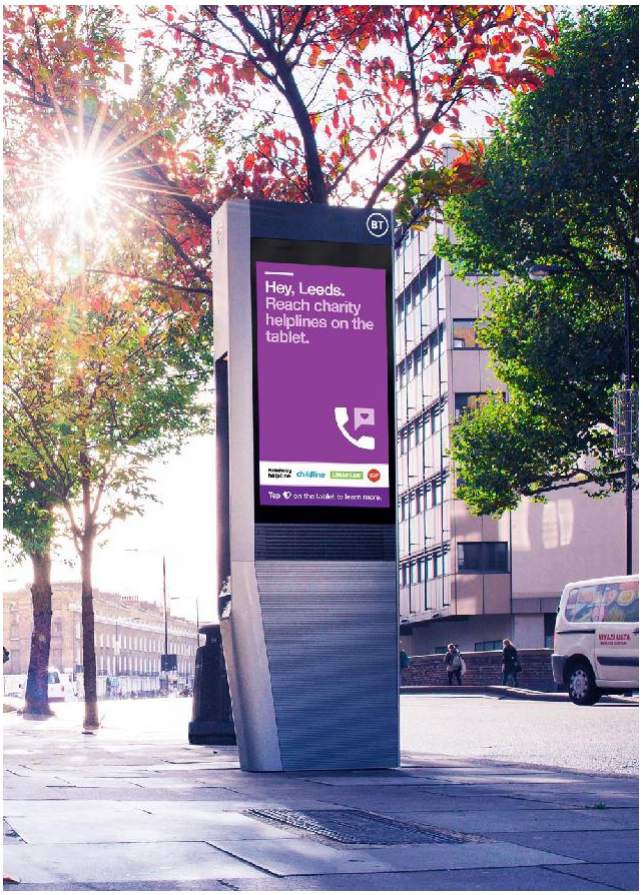
Case study

Helped local and national charities

InLinkUK worked with a range of charity stakeholders to support their work in the community, with a 'Charity Tile' on the InLink tablet that provides access to a range of key organisations.

Childline, End Youth Homelessness, Runaway Helpline and Samaritans teamed up with InLinkUK to provide users with direct access to their services.

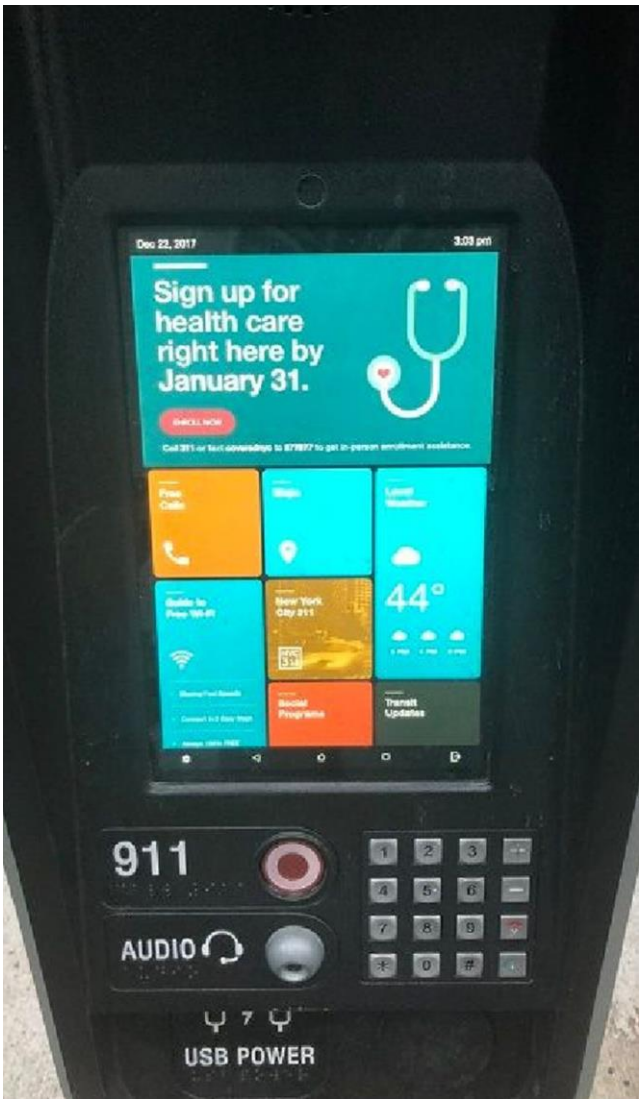
This was complemented by a range of content included on the screens to raise awareness and support the work of local and national charities.



Case study

Helping rough sleepers

During the 'Beast from the East' storms in April 2018 InLinks were used to display content from StreetLink that provided those nearby with information on how to help rough sleepers who were still outside during the bad weather.



Offices Worldwide

February 2021

Street Hub Anti-Social Behaviour Management Plan

Beyond connection

BT are working to reduce digital inequality and help make communities better connected. From the iconic red phone boxes to the modern glass units, we've always been at the forefront of technology that brings people closer.

In today's digitally enabled world many phone boxes are sitting unused, prime sites for anti-social behaviour and vandalism. Following the success of our InLink programme where we brought free digital services to high streets across the UK, we're further transforming our legacy payphones into state-of-the-art, fibre-connected digital community hubs – called Street Hubs.

Not only does this remove old payphones, freeing-up space and reducing anti-social behaviour, but each Street Hub gives entire communities access to an unprecedented suite of essential free services. This includes ultrafast Wi-Fi, phone calls, wayfinding, device charging, a dedicated 999 call button and public messaging capabilities. It's also a platform for future technologies – air quality monitoring, emergency messaging, 4G / 5G mobile coverage and more.

Since June 2017, hundreds of first generation Streets Hubs (formerly InLinks) have gone live in cities throughout the UK, connecting over a million unique devices to Wi-Fi every month, with tens of thousands of tablet sessions and free calls each week.

Wherever a Street Hub is installed we work with local stakeholders like councils and the police to ensure they're a positive contribution to the area. We're committed to addressing the few users in limited locations who abuse this service.

Automatic anti-social call restriction

The advanced nature of Street Hubs and our investment in quality systems means we can quickly identify and solve issues.

Working with local stakeholders has already led to significant technical and process advances that further help each Street Hub contribute positively to the local area.

A small number of locations drew attention to local drug issues, with those involved misusing free call services. Following this we invested significantly in developing call restriction capabilities. These were first used to prevent calls to mobiles on select Street Hubs in problem areas – identified with the help of police and council community safety teams.

The automatic recognition of possible misuse and blocking of identified numbers is based on a proprietary algorithm and technical process developed in consultation with the police and councils from across the UK. These consider a range of factors, including but not limited to the frequency of attempted and connected calls, the length and distribution of such calls, and insights provided by relevant stakeholders.

Once numbers are identified, their call data is continuously assessed and our algorithm always applied. When a blocked number is flagged by the algorithm this restriction is permanent. In some cases, on request, we may restrict numbers over a set period.

Should someone believe a number has been wrongly flagged, they can contact our team at [redacted] who will consider the case, consulting with the police and local council where appropriate. This option will be shown on the Street Hub screen as part of the warning notification when a restricted number is dialled.

Subject to internal processes, the police can 'whitelist' a specific number so it can still be called where there is an operational need, such as being involved in an active investigation.

This automatic anti-social call restriction technology is a dynamic feature of Street Hubs that can be adapted over time as further insights are gained or as patterns of misuse change.

Identification of anti-social behaviour issues

We take our responsibility towards community wellbeing and anti-social behaviour seriously, as evidenced by our above investment. Where possible we address any concerns before (or as part of) the planning application process which every Street Hub must go through.

Unfortunately this is not always possible, and pre-existing or emerging concerns around misuse may need to be addressed once a Street Hub is active, if not picked up by the automatic anti-social call restriction technology.

In deciding the best course of action, advice from police, other emergency services and local authorities will always take precedence, followed by feedback from other government bodies and input from residents and businesses.

To best identify issues and how to address them, we need:

- a description of the issue and when it occurred(s)
- the location of the Street Hub(s) involved and how they contributed.

Supporting evidence is also important, where legally possible, to help us understand the issue (i.e. data or images) so that the appropriate action can be considered.

Each Street Hub is remotely monitored for service compliance 24 hours a day 7 days a week, and physically inspected and cleaned at least every two weeks. As such, any issues are likely to be quickly reported to us directly.

Where a police officer, member of the public or council officer identifies a possible anti-social behaviour issue, we can be contacted in a number of ways to take appropriate action.

Sending an email to [redacted] is the main method for reporting an anti-social behaviour issue associated with a Street Hub. This will automatically raise a ticket on our system, which is actively reviewed and managed by the Street Hubs team.

Emails sent from police.uk or .gov email addresses will be treated as priority.

Technical issues like display screen failures, graffiti, etc. should be reported to [redacted].

Should it not be possible or convenient to send an email, the Street Hubs helpline is open 24 hours a day, 7 days a week on [redacted]

Although we're committed to working closely with communities to address concerns around anti-social behaviour, suspected criminal behaviour may need to be managed through official police channels by contacting 101 or 999 in an emergency.

Assessment and determining the suitability of technical changes

After receiving a police crime risk assessment or report from a local authority suggesting a Street Hub may be contributing to crime or anti-social behaviour, we will assess the technical solutions available to minimise / reduce this.

The location of each Street Hub means the way they are used and experienced varies, and so the solution will need to be bespoke.

Where a temporary or interim technical change to a Street Hub may be considered, we work with the local council and police wherever possible to gather timely evidence and information so we understand what is happening and how best to respond. This could include:

- reviewing the information provided from any previous tickets
- visiting the location and meeting with local stakeholders
- speaking with the local police and council to understand any reports they have received and what they are already doing to tackle similar issues in the area
- collating relevant media reports, historic records, and similar
- assessing Street Hubs data such as anonymised call information, Wi-Fi usage, etc.

Situations that follow a similar pattern may be handled more quickly based on recommendations from groups such as the police. For example, temporarily restricting the ability to call mobile numbers where it has been proven that a Street Hub is being misused to buy illegal drugs.

Implementing available technical changes

Street Hubs are actively monitored and adaptable, with a range of temporary and interim technical measures available to help manage anti-social behaviour issues. These were part of the original design or developed as part of our dedication to community wellbeing.

These include but are not limited to:

- using the displays to include warnings and relevant information
- further reducing the Street Hub's call speaker volume
- disabling the USB port to prevent loitering around the unit
- preventing calls to types of phone numbers, such as mobile, landline or freephone
- blocking calls to specific numbers (only when agreed with the police, in addition to those captured under automatic anti-social call restriction).

We prefer to make changes in collaboration with relevant stakeholders to minimise any unintended social impact. For example, a local council or police command providing additional street teams in the area.

Our anti-social behaviour portal has advanced since the roll-out of InLink. As well as our algorithm, the portal now lets us block suspicious behaviour in real time so we can tackle any anti-social behaviour request without delay. We also have greater insight into reporting and numbers where thresholds are exceeded. These technical advances help reduce crime and allow us to work better with the police and community.

Sign off and implementation

Any change made to how a Street Hub is configured at a hardware or software level will require our agreement.

As an OFCOM-designated Universal Service Provider of public call boxes for the provision of a publicly available telephone service, any decision to restrict provision of phone calls will need to be made exclusively by us. This will be based in part on detail provided by the police and local authority, and pay due regard to the evidence presented.

We would always seek to balance any requirement to restrict Street Hub services to manage anti-social behaviour with the desire to make them available to all, as part of our work to help make communities better connected and reduce digital inequality.

Review process

Our approach to addressing anti-social behaviour associated with a Street Hub is to be collaborative. The success of any intervention relies on the police and / or councils taking reasonable steps to help address the underlying issues and the review process being tailored to each local situation.

In the small number of cases where the need for an operational change (such as restricting phone calls) has been identified, it will be considered temporary and applied for a limited period (typically three months but up to twelve months in high-risk locations). This temporary period allows police and the local council to investigate and take appropriate action.

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 [redacted].

Offices Worldwide

April 2021

Street Hubs

Beyond connection

Frequently asked questions

Contents

Frequently asked questions
About Street Hubs

What are Street Hubs?

Street Hubs are cutting-edge phone-box replacements that bring a host of free services to communities, including:

- ultrafast Wi-Fi up to one gigabit speed (1,000 Mbps)
- fast device charging via two USB ports
- emergency services via a dedicated 999 button
- council services via a touchscreen tablet
- free UK national landline and mobile phone calls
- two 55” or 75” high-definition digital displays used for public service announcements and advertising.

What benefits do Street Hubs bring to communities?

They keep communities digitally connected to local services.
They are always on for key public announcements and advertisers to reach their audience. Whether it's a small, medium or large organisation, a council, or a local group, they can get their message seen. We work closely with councils when we rollout Street Hubs so they get the most from them, and help those who live in, work in or visit these places with digital services at their fingertips.

How much does it cost to use a Street Hub?

Street Hubs provides a free digital service. Ultrafast Wi-Fi, council services via the touchscreen tablet, device charging, and calls to UK landline and mobile phones – all free. International and premium rate phone calls can also be made using a calling card.

How does BT fund Street Hubs?

Street Hubs come at no cost to the taxpayer, national or local. Deployment and maintenance of Street Hubs are funded by revenue from advertising on the digital displays.

What happened to the InLink from BT?

In December 2019, BT acquired the digital street unit assets from InLink Limited.

How can I advertise on a Street Hub?

We've partnered with our Global team to provide outdoor advertising for 500 Street Hubs across the UK. If you'd like to enquire about this, please contact Global at https://global.com/contact

How can I get Street Hubs in my council area?

Email us at [redacted] to learn more about bringing Street Hubs to your area.

How do I contact Street Hub?

We're excited to hear from you. Drop us an email at [redacted]

Frequently asked questions
Using Street Hubs

How can I charge my mobile device at a Street Hub?

Simply plug your charger cable into one of the two fast-charging USB ports located below the headphone jack. These ports are power only, and cannot transfer data to or from a Street Hub.

How can I make a free phone call from a Street Hub?

You can make free phone calls to anywhere in the UK, including mobiles, using the touchpad on the tablet or directly using the keypad.

To make a call using the tablet:

1. Tap the screen and choose ‘Make a Call’ on the tablet screen
2. Dial the number you wish to call on the touchscreen
3. Tap the green handset button to start the call
4. When you finish your call, press the red handset button to hang up.

To make a call using the keypad:

1. Dial the number you wish to call on the keypad
2. Tap the green handset button on the bottom right of the keypad to start the call
3. When you finish your call, press the red handset button above the ‘Call’ button to hang up.

Need to adjust the call volume? Use the plus (+) and minus (-) buttons on the keypad to turn the volume up or down. You can also plug in your headphones for more privacy.

Can I make an international phone call from a Street Hub?

Yes, you can make an international call using any international calling card with a UK number. Just follow the instructions on your card.

How can I make an emergency call from a Street Hub?

In an emergency, push the red 999 button twice to connect to the emergency operator.

Which local services can I access on a Street Hub?

This will vary depending on the services available online from local councils and charities.

Frequently asked questions

Technology and network

What is ultrafast Wi-Fi?

With speeds up to one gigabit, Street Hub Wi-Fi is most likely the fastest you've ever experienced, with no data caps or annoying ads.

Will I always receive a gigabit of bandwidth when I access the Wi-Fi?

Not always, many factors can affect the real bandwidth available to a connected device. Among these are the number of devices connected, individual device performance, radio interference in the environment from wireless or other electronic devices, and the speed of the services being accessed. It's rare to get the full gigabit, but by providing a gigabit network we're ensuring the best possible performance for all.

How many people can use Wi-Fi at one Street Hub hotspot before the Wi-Fi speed slows down?

A Street Hub can support hundreds of users simultaneously up to 100 or 150 metres from each unit. Performance depends on the activity, and the network is always shared equally with all connected users.

What kind of tablet and tablet functionality does Street Hub provide?

Street Hubs have an integrated custom Android tablet, providing users with free access to council services, charity information, maps, weather and free UK national landline and mobile phone calls.

How often is Street Hub's hardware updated?

Technology changes in the blink of an eye, so Street Hubs are custom-built to keep up with the latest technologies and user experience trends with a modular design updates through then network.

Do Street Hubs have sensors?

Yes, they can capture data such as air and noise pollution, outdoor temperature and traffic conditions. This could be used for exciting new 'smart' services for local councils and communities based on the Internet of Things.

Who owns this fibre network?

Street Hub is owned and managed by BT.

How do I report if something's wrong?

Please email us at [redacted]

Frequently asked questions

Security and privacy

How secure is Street Hub Wi-Fi?

Any personal information that we store about users is encrypted – your email address cannot be read without a special key. This is the most effective way to secure data. As with any public Wi-Fi network, we recommend that you always look for the secure lock symbol on your browser bar if you are transmitting any sensitive information.

What safety precautions do you recommend when using the Street Hub service?

As always, be vigilant while using personal devices on the street or using the free Street Hub tablet. Be mindful of your surroundings and use your device's security features just in case your device happens to fall into the wrong hands.

Is the Wi-Fi filtered?

Our Wi-Fi experience is designed to be consistent with the content filters used by UK internet service providers (ISPs) to ensure safety and child protection while using Wi-Fi in a public space.

When I charge my phone, is it possible to transfer data to or from a Street Hub?

No. Street Hub's USB port is power-only, and cannot transfer data. No information about your device is recorded when you use our USB charging ports.

I forgot to end my session before I stopped using a Street Hub tablet, what do I do?

Street Hub tablet sessions time out after 30 or 45 seconds of inactivity, wiping all user sessions clean.

How does Street Hub use my personal data?

Street Hub is committed to protecting and respecting your privacy. Our Privacy Notice describes how we collect, use and share information.

Offices Worldwide

February 2021

STREET HUB

Existing & Proposed Views

Existing

Proposed

Site Address: Footpath outside Kingsholm Stadium, Kingsholm Road, Gloucester, GL1 3AX

Reference: GLC-232

Planning Supporting Statement

Our Ref.	GLC-232
Street Hub Address	Footpath outside Kingsholm Stadium, Kingsholm Road, Gloucester
Postcode	GL1 3AX
National Grid Reference	E: 383436 N: 219146
Project Type	Relocation
Conservation Area	No
Statutory Listed Buildings	No

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Rev	Originator	Approved	Date
0	Name	Name	Day/Month/Year
1	[redacted]	Martin Brown	July 2022

1.0 Introduction

1.1 Overview

This Planning Supporting Statement has been prepared by Harlequin Group on behalf of BT Group plc. The statement has been prepared in support of the planning application made to the Council for the installation of a 'Street Hub' at the footpath outside Kingsholm Stadium, Kingsholm Road, Gloucester, GL1 3AX (NGR: E- 383436 N- 219146). This application is made under the Development Management Procedure Order (2015). The statement sets out the most relevant considerations in respect of the proposed development.

In accordance with the Code of Best Practice on Mobile Network Development and published Government guidance, this proposal was drawn up having regard to the need for good design. This statement sets out the most relevant considerations in respect of the proposed development. This provides context for the proposal, reasoning, technical justification and planning constraints, policy guidance and alternatives.

Considerations of design and layout are informed by the context, having regard not just to any immediate neighbouring buildings but the immediate and wider townscape. The local pattern of streets and spaces, building traditions and materials all help to determine the character and identity of the development.

1.2 Purpose of Street Hubs

2021 marks the 100th anniversary of the original K1 kiosk. Public connectivity moved on with the deployment of InLink units, and now, BT are further updating and evolving the payphone estate to better serve todays digitally connected converged-media society.

Over the last few years, BT have been working as part of an exclusive partnership with InLinkUK to ensure communities in urban areas throughout the United Kingdom are well-served in the digital age through the roll out of 'InLink' units. These were developed and deployed to replace and rationalize the existing network of payphones. Through collaboration with councils, BT have helped in creating a service that has revolutionized streetscapes and helped in providing a connected city solution that delivers the fastest and most robust free public Wi-Fi service in the UK. Councils across the UK have used the InLink units to meet key challenges head-on, upgrading local infrastructure, tackling the digital divide, and freeing the high street from unnecessary furniture.

Unfortunately, InLinkUK (who were supplying the units to BT within the partnership) went into administration in 2019, and, as such, the InLink product is no longer available. Since then, BT have been working over the last 18 months on a new and improved unit - the 'Street Hub'. The Street Hub has all the existing benefits of the previous InLink structure – ultrafast Wi-Fi, free public calls, public information - but with better Wi-Fi range, environmental monitoring, secure power-only USB ports for rapid device charging, and an expanded phone network coverage with 5G mobile enablement. Street Hubs have the capacity to boost 4G and 5G through the installation of small cells within the unit casing, improving coverage and capacity. Consequently, when installed, residents, local businesses and visitors will get a faster, more reliable connection for calls and internet access.

Additionally, these new units will be monitored 24/7, with weekly inspections and a minimum of bi-weekly cleaning services to keep the unit to a high standard of finish within the existing streetscape. All units will be fitted with a direct 999 call button to aid in the efficiency of operations of the emergency services, with emergency (i.e., Police) awareness messaging shown via their advertising screens on either side of the unit.

Furthermore, Street Hubs are powered by 100% renewable carbon-free energy, making them sustainable and durable for years to come.

BT head of street James Browne said: Street Hubs form part of BT's plan to transform the UK's streets with a digital communications service designed for the 21st Century.

> *"I'm really excited that we're now evolving the service even further with a newly designed Street Hub 2.0 unit which is more sustainable while delivering free public Wi-fi services and improved 4G/5G mobile coverage to local communities.*
>
> *"The free digital services provided by our Street Hub units can play an important role in helping to revive the UK's high streets following the pandemic.*
>
> *"We are working closely with local councils and communities to introduce the new units to more parts of the country, enhancing the UK's future digital infrastructure, and bringing benefits to residents, businesses and tourists alike."*

1.3 The Importance of Mobile Connectivity

The ability to access mobile data and voice services is an integral part of modern life. Mobile devices are relied upon by consumers and businesses. Mobile connectivity is no longer seen as a luxury: the ability to make calls, access the internet and receive e-mail and text is seen as a necessity. Businesses, large and small, need mobile connectivity to operate effectively and to compete in an increasingly global market. In an emergency, the public rely upon mobile devices to call for help and the emergency services rely upon mobile services to respond.

1.4 UK Government Policy on Mobile Infrastructure Deployment

The UK government has identified the need for greater investment in mobile infrastructure to increase the widespread availability and capacity of mobile voice and data networks.

"The Government acknowledges that there has been a profound shift over the last decade in the way citizens approach and access digital communications. What was once seen as a luxury is now a basic need, and people expect to have access to fast broadband at home, irrespective of where they live, and use their mobile devices anywhere they go". DCMS, May 2016.

The last few years have seen a number of UK-wide initiatives to improve coverage including:

- Coverage commitments in the 4G LTE spectrum awarded to Telefonica O_2 (February 2013) to deliver mobile broadband with 98% indoor premises coverage by the end of 2017
- National commitment by all four MNOs (December 2014) to deliver 90% geographic coverage by 2017
- Mobile Infrastructure Project (MIP) – investment by DCMS of up to £150m (to March 2016) in towers to deliver connectivity in complete mobile not-spots.
- Changes to the Permitted Development rights afforded to communications code operators (such as WIG) to allow new networks to be rolled-out more efficiently.
- Changes to the Electronic Communications to Code (December 2017) to allow mobile operators to more easily roll-out new communications infrastructure.

1.5 National Support for Modern Communications

There is significant UK Government support for the delivery of 5G, particularly as this new connectivity will be a step change from earlier generations of mobile connectivity and will be critical to economic growth and sustainable communities. Our accompanying document of national policy '**National Policy - Delivering Ultra Fast Broadband Mobile Connectivity',** sets out how 5G mobile connectivity will underpin the UK Digital Economy and the significant social, economic and sustainability benefits of advanced modern connectivity. It is essential that the planning system looks to support and facilitate new 5G base station installations such as that proposed to meet the Government's Digital Strategy. In addition, modern connectivity, such as 5G, will

be essential to help the Government meet its wider sustainability and climate change targets.

1.6 Air Quality Monitoring/Sustainability

Each year, thousands of people die prematurely as a result of air pollution across the country, and millions more face health threats every day. Many Council areas have breached legal limits for air quality every year since implementing them in 2010, with many Council areas, including all of London's boroughs, failing both annual targets and World Health Organisation standards.

Some people are especially vulnerable to the dangers of air pollution and contraction of viruses – including children, the elderly, low-income communities and those with diabetes, heart disease or respiratory problems. These groups may suffer an increased risk of developing cardiovascular disease, cancer, asthma, and other respiratory diseases; or of worsening conditions that are already present. What we typically think of as air pollution is a mixture of small particles such as black carbon, gases like nitrogen oxides, ozone, and sulphur dioxide.

In January 2019, the Mayor of London launched the world's most advanced and comprehensive network of air quality monitors to help investigate and improve London's toxic air. This programme known as 'Breathe London'[1] will use a range of cutting-edge fixed and mobile sensors to build up a real-time, hyperlocal image of London's air quality. The data these monitors collect from across the capital will provide an unprecedented level of detail about London's air quality crisis and deliver new insight into the sources of pollution.

While the above referenced network of air quality monitors is focused on the capital, poor air quality is not exclusive to London, with many, if not all, Council areas throughout the country experiencing higher than acceptable levels of poor air quality. As highlighted, understanding the issue and identifying areas where there are high levels of poor air quality is key in then implementing adequate measures aimed at reducing such levels of poor air quality.

Sustainable design is at the core of the new unit offering. Working with tech scale-up Everimpact via BT's Green Tech Innovation Platform, air quality and CO2 sensors are built into the new units. This will provide actionable environmental insights to help local councils achieve their sustainability goals such as becoming carbon neutral by 2030, a target that nearly two thirds of local authorities have made. Supporting the clean air initiatives of local authorities will lead to improved air quality, in turn benefiting the health of local communities.

[1] https://www.breathelondon.org/about/

2.0 Proposed Development

2.1 Site and Proposed Development

The application site comprises a wide pedestrian footpath that runs along Kingsholm Road, Gloucester, situated outside Kingsholm Stadium, with the surrounding area resembling a mixed use residential and commercial streetscape. There is an existing BT phone box in situ on the footpath, as such, the principle for telecommunications equipment is established at this location. As the existing phone box will be removed to make way for the new Street hub unit, this will result in a decluttering of the footpath due to the reduced footprint of the evolved unit and consequent enhancement of the area's visual amenity.

The site location is shown on the image below, highlighted by way of a yellow star for context.

The proposal would see the installation of a single Street Hub unit to be located on the footpath outside 5-7 Stroud Road (Papa Johns), Gloucester, GL1 5AA (Approximate National Grid Reference: E- 382843 N- 217756). This forms part of a strategic package of applications submitted to the Gloucester City Council, containing a number of Street Hubs located throughout Gloucester's existing streetscapes. It should be noted that these proposals for the installation of a number of Street Hubs will see with it the removal of existing, outdated and worn-down BT payphones, at no extra cost to the council. This would help in achieving the advancement and decluttering of the council's streetscapes, in line with the UK Digital Strategy, the National Planning Policy Framework, and the *"Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011-2031"* (to be called the *"Joint Core Strategy"* from here on).

2.2 Street Hub Design and Dimensions

Street Hubs are free-standing structures featuring a fully accessible tablet interface and digital HD display screens on two sides. Overall Street Hub dimensions are 35cm deep and 123.6cm wide (reduced tapered footprint is 120.1cm), with a height of 298cm to maximize the Wi-Fi range without dominating the street. A narrow base limits the footprint while ensuring access to wheelchair users.

Street Hubs have been designed to be accessible to all users, regardless of their physical or technological capabilities, including:

- Tablet interface placed at 1m to provide easy access for wheelchair users
- Easy-touch 999 call button to ensure it can be used regardless of mobility restriction
- High-contrast large type labels
- TalkBack functionality facilitates full access to the tablet for all users
- Hearing induction loops integrated into each unit Intuitive touch screen interface.

Also, 'Next Generation Text Relay' makes Street Hubs even more accessible to those who are deaf, hard-of-hearing or speech impaired. Using the tablet callers can type words for a Relay Assistant to then speak to the call recipient. The Relay Assistant types back any responses to the caller, allowing for an effective two-way conversation.

The Street Hub unit will be funded through the display of advertising in conjunction with other council and community content, via sponsorship from companies who will utilize the digital HD display screens on both sides of the unit. The two screens automatically dim at night to 600cd/m2, following daylight hours and in accordance with the levels set for this type and size of screen (those under 10m) by the Institute of Lighting Professionals, Professional Lighting Guide 05 2015: The Brightness of Illuminated Advertisements - minimizing disturbances to residents in the evening.

The screens will display content at 10-second intervals, in the form of both the commercial content that funds the service, as well as a wide range of local community and council content. As such, the proposed Street Hub will provide 876 hours of free council advertising per year with the opportunity for discounted advertising for local business groups (such as BIDs and Chambers of Commerce) and their members through BT's Street Hub Partners Program.

Additionally, every Street Hub provides access to maps giving directions to nearby landmarks and services – a valuable resource for visitors or those without access to a smartphone. They also act as wayfinding boards, giving walkers and cyclists clear directions, and providing local advertisers the opportunity to give simple directions to their businesses.

This sponsorship will also cover the maintenance and servicing costs of the Street Hub. This is necessary to ensure the program remains financially sustainable. Displayed advertisements will comply with all advertising regulations and guidelines. Further detail is provided in the attached Street Hub Product Statement and associated documents.

Moreover, all Street Hubs are powered by 100% renewable carbon-free energy, with energy efficiency prioritized throughout the design process. This is most evident in the following features:

- A state-of-the-art LED-backlit LCD screen that consumes approximately 60% less power than Cold Cathode Fluorescent Tubes
- Screen filters reflect light reducing the need for high power, noisy cooling systems typically seen in competing solutions
- Industrial-grade components designed to function at high temperatures lower the need for cooling without compromising performance
- Passive design for cooling, i.e. aluminium casing for better thermal dissipation
- High-efficiency power supplies providing 80% or better efficiency, compared to 65-70% of typical components.
- Noise from cabinet and equipment should not exceed: 41dB at a distance of 3 metres during day, 35 dB at a distance of 3 metres during night, Operational volume should not exceed 60dB at a distance of 1 metre.

2.3 Application History

Having checked the Councils online planning search, there is no relevant history relating to the proposed site.

2.4 Alternative Site Assessment

Paragraph 115 of the revised National Planning Policy Framework, in which the Government's supportive stance towards developing high-quality communications infrastructure is laid out, states that "The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate."

In addition to this, Appendix A of the Code of Best Practice (2016) sets out the options for the siting and design of communications equipment. It explains that, "local planning authorities should support the expansion of electronic communications networks, including telecommunications and high speed broadband. They should aim to keep the numbers of radio and telecommunications masts and the sites for such installations to a minimum consistent with the efficient operation of the network. Existing masts,

buildings and other structures should be used, unless the need for a new site has been justified. Where new sites are required, equipment should be sympathetically designed and camouflaged where appropriate."

As the proposal would see the removal of 1No. existing BT telephone box, it is considered that while the application is for the installation of a new Street Hub unit, works will be undertaken at an established telecommunications site and not for the development of a new site, thus the consideration of alternative sites is not appropriate in this instance. As a result, it is therefore considered that the principle of telecommunications development at this location would represent an acceptable form of development, consistent with Government guidance which seeks to encourage the use of existing sites, buildings and other structures for new electronic communications capability (including upgrading).

It should be noted that a major aim of the Street Hub rollout is to clean up the clutter of outdated phone boxes within the council's streetscapes. As such, by removing the existing 1No. phone box from the proposed location site and replacing it with a far-superior, technologically advanced Street Hub unit, the general locale will benefit from a system that aims to promote a safer and smarter city – as pursued by NPPF guidance. The application site, therefore, represents the only feasible option in this instance regarding relevant material planning considerations, by allowing the requirement to be met without the deployment of an additional site beyond the existing phone box in the locality.

2.5 The Gloucester City Council Rollout

This application is part of a wider scheme of Street Hub deployment across Gloucester. A number of locations have been identified for the installation of a Street Hub. All proposals for Street Hubs are currently the subject of applications for Express Advertisement Consent under the Control of Advertisement Regulations in respect of the 2No. LED digital display screens located on either face of the unit.

In terms of roll-out, where possible and practicable, it is proposed to install Street Hubs either as a direct replacement for existing BT payphones, or in very close proximity to such payphones. As these existing payphones will be removed it should minimise impact on existing streetscenes by reducing street clutter, or at least not adding to it at particular locations. Whereby a new Street Hub is proposed, BT payphones will be removed, again where possible and practicable from the same streetscape, or same visual envelope, again to try to minimise impact on visual clutter. All of the proposed Street Hubs directly replace, or are very close to, existing payphones for removal. The proposed Street Hub's will help to deliver a comprehensive network of connectivity within the city whilst decluttering Gloucester's streetscene.

In terms of the proposed site to which this application relates, no pre-application consultation was sought with the Gloucester City Council due to the nature of the existing infrastructure being replaced. The proposed Street Hub will replace outdated telecommunications kiosks, which are of a bulkier size, scale and appearance to the Street Hub. As such, by removing the existing kiosk and introducing the Street

Hub on the footprint of the existing kiosk, this will represent a significant reduction in visual clutter within the footpath, which consequently, will help improve the visual amenity and character of the local area.

3.0 Planning Policy

This section sets out the most relevant national and local planning policy concerning the proposed development.

3.1 National Planning Policy and Guidance

National Planning Policy Framework (July 2021)

Planning policy is provided at the national level by the National Planning Policy Framework (NPPF). It is a material consideration in planning decisions. The NPPF is pro – development with a 'presumption in favour of sustainable development' seen as a golden thread, running through both plan making and decision taking'. The thrust of this guidance is positive and a reminder to LPAs that we need to build the requisite infrastructure to enable economic growth.

In this regard the Framework can be summarised as follows:

- Government policy is to support high quality communications infrastructure and systems as essential for sustainable economic growth;

- Government policy is to keep the inevitable environmental impact associated with electronic communications development to a minimum;

- The best way to minimise environmental impact is to avoid the unnecessary proliferation of new radio masts and sites;

- The starting point for planning new networks or the expansion of existing networks is therefore to use existing electronic communications sites as and when applicable;
- The emphasis on minimising environmental impact is greater per the sensitivity of the site. The emphasis on exploring and utilising site sharing opportunities is consequently higher in these circumstances;

- Great weight should be given to conserving landscape and scenic beauty in certain specified designated landscapes, e.g. National Parks, Areas of Outstanding Natural Beauty, Conservation Areas, etc.;

The NPPF as a whole is aimed at encouraging a more positive approach to town planning. While the NPPF builds environmental protection into the definition of sustainable development, there is also a very clear emphasis that local planning authorities should be looking for ways to help development come forward and not reject applications simply on environmental grounds. This is emphasised in paragraph 10 of

the NPPF, which states that in order that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development. The NPPF recognises that this is especially relevant where a development might have other significantly important benefits such as being essential to meet, for example, enhancement and improvement to existing communications infrastructure.

Paragraph 11 of the NPPF state that for 'decision-making', the presumption in favour of sustainable development means approving development proposals that accord with an up-to-date development plan **without delay**; or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. *the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*

ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

As such, development proposals that accord with the provisions of the Development Plan should be approved without delay. In respect of this guidance, the following sections of this statement demonstrate that the proposed development accords fully will all relevant Development Plan and NPPF policies and, therefore, permission should be granted for the development.

The importance of the proposed development in providing the upgrading and expansion of the existing communications network is clearly an important material planning consideration as it directly supports sustainability and is also precisely the type of new digital infrastructure that the NPPF is seeking to support. The development proposed is comparatively small scale, sited where the principle of telecommunications development has been long established and therefore accepted, designed in a way that is predominately consistent with the existing infrastructure setup and so should be acceptable in every respect.

However, for completeness we still highlight some of the key points within the NPPF as they help demonstrate why the application should be permitted:

Paragraph 7 advises that the purpose of the planning system is to contribute to the achievement of sustainable development. It then states that: "*At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs." [our emphasis]*;

Paragraph 20 advises that strategic policies should "*make sufficient provision for…….telecommunications" and that it should "be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances*"

Paragraph 38, on "decision-making" states that authorities should "*work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible*".

The NPPF builds on the aspiration to build a strong, competitive economy. Paragraph 81 states: *'Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking in to account both local business needs and wider opportunities for development. The approach taken, should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation[42]'*...

Footnote 42 of the NPPF states: *'The Government's Industrial Strategy sets out a vision to drive productivity improvements across the UK, identifies a number of Grand Challenges facing all nations, and sets out a delivery programme to make the UK a leader in four of these: artificial intelligence and big data; clean growth; future mobility and catering for an ageing society. HM Government (2017) Industrial Strategy: Building a Britain fit for the future'*.

As highlighted previously, the NPPF (2021) directly addresses the need for enhanced wireless communication services, first mentioned in paragraph 20, which states that an LPA's strategic policies must make sufficient provision for:

"b) *infrastructure for transport, telecommunications (our emphasis), security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)"*

Leading on from this, paragraph 114 states 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) and full fibre broadband connections. Policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time……*". This wording echoes guidance set out in paragraph 42 of the 2012 version of NPPF. However, unlike the previous version it also includes the importance of reliable communications infrastructure for both economic growth and social well-being.

While supported, paragraph 115 of the NPPF retains the requirement to minimise the number of installations consistent with the efficient operation of the network but also includes being consistent with the needs of consumers and providing reasonable capacity for future expansion.

Paragraph 118 retains the guidance set out in previous versions of the NPPF version and states that "Local planning authorities must determine applications on planning

grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure".

As can be seen from the above, the NPPF clearly acknowledges the benefits of modern electronic communications and seeks to encourage such development as being essential due to their role in supporting a modern economy, contributing to sustainable objectives, and enhancing local community access to a range of goods and services. Local planning authorities are advised to respond positively to proposals for electronic communications development and this must include an understanding of the associated special problems and technical needs of developing and upgrading communications networks.

Public benefits are defined within the NPPG and could be anything that delivers economic, social or environmental progress. Benefits do not always have to be visible or accessible to the public in order to be genuine public benefits.

In the case of this proposal site, the installation of the Street Hub unit would provide a modern, multifunctional alternative to the traditional 'mast' that would act as a communication hub within a dense urban area.

Code of Best Practice on Mobile Network Development in England (March 2022)

The Code of Best Practice has been fully revised in March 2022 and is now even more supportive of mobile network provision in line with Government aspirations that everyone should have access to the information superhighway no matter where they are located whether that be in rural or urban areas. This Code provides guidance to mobile network operators, their agents and contractors and equally to all local planning authorities in England. It supersedes the Code of Best Practice on Mobile Phone Network Development (2016).

The principal aim of this Code is to support the 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 development of such infrastructure must be achieved in a timely and efficient manner, and in a way, which balances connectivity imperatives and the economic, community and social benefits that this brings with the environmental considerations that can be associated with such development. The Code also has an important role in making sure that appropriate engagement takes place with local communities and other interested parties. The Code also highlights that wireless technology continues to evolve rapidly, and mobile devices are now capable of much more. Second generation (2G) technology gave us voice calls and text messages, 3G led to the launch of smartphones, and 4G, which enabled faster browsing, allowed us to do things like watching videos on the move. 5G, the latest generation of wireless technology, is much faster than previous generations of wireless technology and can

offer greater capacity and lower latency, allowing thousands of devices in a small area to be connected at the same time. 5G networks, and future mobile generations, will be vital for a range of Internet of Things uses (IoT)and Smart City applications.

The Code highlights that local planning authorities should support the deployment of digital infrastructure by:

- Incentivising connectivity: support the expansion of telecommunications networks, and take a 'joined-up' approach to the wireless infrastructure planning process, including ensuring that Local Plans effectively support the deployment of digital infrastructure.
- Facilitating sites: engage with operators when new sites have been proposed and discuss site requirements.
- Engagement with operators: respond positively to requests for engagement and make decisions in line with national policy and Local Plans. For planning applications, find solutions to issues and ensure timely decisions are made.
- Information and communication: ensure that members of the public can access information about any development proposals within their local area. Send communications promptly to an appropriate operator contact (or their representatives).

The Code highlights the Government's Communications Policy and Planning Policy. It acknowledges that digital connectivity is vital to enable people to stay connected and businesses to grow. Fast, reliable digital connectivity can deliver economic, social and well-being benefits for the whole of the UK. The Code indicates that recent changes in planning policy [and regulation] are intended to align with Government communications policy, where the ultimate goal is to achieve mobile coverage wherever it is needed. Furthermore, Section 2 of this Code also reiterates NPPF guidance in strongly supporting high quality communications infrastructure, which is seen as essential for sustainable economic growth.

The Code acknowledges that there are special operational and technical considerations associated with mobile network development, which have changed over time due to changes in technology and associated changes in demand. The Code acknowledges that all wireless network installations are principally guided by the technical need for the site and the technical constraints placed upon transmitting a signal. It then goes on to state that "the three primary technical and operational considerations for installation sites are: ensuring that wireless infrastructure provides an appropriate level of coverage over the intended geographical area; ensuring that sites have sufficient capacity to meet user demand; and, requiring a connection to the wider network 'backhaul".

It then goes onto state that "With the introduction of 5G, more equipment will be required to provide coverage and capacity. 5G, as well as 4G, are data-driven technologies, and high volumes of data will be transmitted between base stations and wireless devices. 5G will require a denser network of base stations than previous generations, including more fixed line fibre optic cable for reliable and high capacity

backhaul. The siting of 5G installations will be more constrained and guided by these special technical and operational considerations.

Due to the scale and technological constraints of 5G equipment, in some cases previous camouflage design solutions, such as tree mast designs and concealing antennas in flagpoles, may not be practicable or suitable. In these cases, simple designs with particular attention to colouration and finishes may help reduce visual impacts on a site-specific basis".

In acknowledging the considerations of new technology such as 5G, the revised Code continues to advise that this does not mean that there will not be a need for any new base stations. Indeed, for example, more base stations will be needed in areas where there has previously been only limited or no coverage and where coverage and capacity needs to be enhanced in line with Government commitments and customer demand. Similarly, some new sites will be required to replace existing sites that are lost, for example, through redevelopment of an existing building. Some masts may need to be redeveloped or replaced to enable an upgrade in services to take place.

Section 5 relates to mobile connectivity in the 21st Century, explaining that mobile phones and other devices are now everywhere. Mobile connectivity is not just making calls and texts but also mobile broadband. The majority of mobile phones in the UK are Internet enabled smartphones and large numbers of people also now own tablet devices. People are increasingly choosing to access the internet using a mobile device even when they have fixed broadband connection available.

The Code acknowledges that by the second decade of the 21st Century, the greatest increase in traffic across mobile networks was in data i.e. internet use (para 5.3). Paragraph 5.4 states that in terms of the wider economic impact of mobile connectivity, research by Deloitte on the economic impact of mobile broadband across a range of countries, showed that a doubling of mobile data use leads to an increase of 0.5% in the Gross Domestic Product per capita, while another study put the benefit of 4G mobile broadband to the UK economy at £75 billion over a decade. Section 5 of the Code goes on to highlight that connectivity promotes social inclusion. In recent years, more people rely on a mobile phone than they rely on a landline. Furthermore, people on lower incomes are even more likely to live in a mobile only household, or to access the Internet using a mobile connection (para 5.5).

The Code highlights that planning authorities, and those who represent rural areas, should recognise the importance of access to reliable mobile broadband and services for those who live and work in rural communities, including coverage for the emergency services network. The benefits of high quality wireless connectivity to the rural economy are far reaching - better wireless infrastructure will give rural communities greater choice and access to services, allow businesses to grow, and have positive impacts on healthcare, education, tourism, and remote working.

Proposed Reforms to Permitted Development Rights to Support the Deployment of 5G and Extend Mobile Coverage (August 2019)

Although the application does not benefit from current permitted development rights based on the increase in width for the replacement mast of more than a third that of the existing mast, the applicant is mindful of the recent government support for the development of digital connectivity set down within recent consultation on changes to permitted development rights.

Important text states that the Government recognises that widespread coverage of mobile connectivity is essential for people and businesses. People expect to be connected where they live, work, visit and travel. The Government is committed to extending mobile geographic coverage further across the UK, with continuous mobile connectivity provided to all major roads.

As well as improved mobile signal, 5G networks are also crucial to drive productivity and growth across the sectors that local areas are focusing on through their emerging Local Industrial Strategies. Enabling and planning for 5G implementation is central to achieving the Government's objective to deliver prosperity at the local level and enable all places to share in the proceeds of growth.

The Government is determined to ensure the UK receives the coverage and connectivity it needs. The Future Telecoms Infrastructure Review, published in July 2018, sets out the Government's long-term strategy for meeting its digital connectivity targets. It restated the Government's commitment to tackling barriers to deployment and concluded that there were steps the Government could take in order to create the right conditions for the investment required to deliver additional network coverage and capacity.

The Government wants to be a world leader in 5G, the next generation of wireless connectivity, and for communities to benefit from the investments in this new technology. All of the four main mobile network operators have announced intentions to begin deployment of 5G networks in 2019 and the current application is a manifestation of this commitment.

The case for 5G is compelling as it will bring faster, more responsive and reliable connections than ever before. More than any previous generation of mobile networks, it has the potential to improve the way people live, work and travel, and to deliver significant benefits to the economy and industry through the ability to connect more devices to the Internet at the same time – creating the so-called "Internet of Things". This will enable communities to manage traffic flow and control energy usage, monitor patient health remotely, and increase productivity for business and farmers, all through the real-time management of data.

3.2 Local Planning Policies

Section 70 of the Town and Country Planning Act 1990, as amended, requires planning applications and appeals to be determined having regard to the provisions of the Development Plan and other material considerations, and section 38 of the Planning and Compulsory Purchase Act 2004 requires applications and appeals to be determined in accordance with the Development Plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy framework (NPPF) - among them the 'presumption in favour of sustainable development'.

For the purposes of Section 70, the current adopted Development Plan for the Gloucester City Council is currently made up of a suite of documents comprising the: *"Gloucester Local Plan 1983"* and the *"Joint Core Strategy 2017"*. Whilst it should be noted that the *"Gloucester Local Plan 1983"* is outdated, two policies are still considered relevant by the Gloucester City Council, however neither of those policies are relevant to this application and thus the *"Joint Core Strategy 2017"* is the main Gloucester City Council Planning document. However, there is no specific Telecommunications policy within the Joint Core Strategy and as such the primary policy consideration when assessing this proposal will be the NPPF.

However, policy SD8, which relates to development in area of historical environments, is of relevance when assessing this proposal

Policy SD8: Historic Environment

1. ***The built, natural and cultural heritage of Gloucester City, Cheltenham town, Tewkesbury town, smaller historic settlements and the wider countryside will continue to be valued and promoted for their important contribution to local identity, quality of life and the economy;***
2. ***Development should make a positive contribution to local character and distinctiveness, having regard to valued and distinctive elements of the historic environment;***
3. ***Designated and undesignated heritage assets and their settings will be conserved and enhanced as appropriate to their significance, and for their important contribution to local character, distinctiveness and sense of place. Consideration will also be given to the contribution made by heritage assets to supporting sustainable communities and the local economy. Development should aim to sustain and enhance the significance of heritage assets and put them to viable uses consistent with their conservation whilst improving accessibility where appropriate;***
4. ***Proposals that will secure the future conservation and maintenance of heritage assets and their settings that are at risk through neglect, decay or other threats will be encouraged Proposals that will bring vacant or derelict heritage assets back into appropriate use will also be encouraged;***
5. ***Development proposals at Strategic Allocations must have regard to the findings and recommendations of the JCS Historic Environment Assessment (or any subsequent revision) demonstrating that the potential impacts on heritage assets and appropriate mitigation measures have been addressed.***

This policy contributes towards achieving Objectives 1, 2, 4 and 5.

3.3 Planning Assessment

Modern cities require to provide both residents and visitors with digital connectivity to enable their day to day living and enjoy recreational activities, all of which contributes to the vitality of the city and its economic and social sustainability.

The aim to replace existing BT payphones with the improved Street Hub units will generally enhance the public realm and many streetscapes, whilst providing free digital connectivity and other services at no cost to the Council, to enrich the users experience of moving through this public realm. The advantage in terms of advertisement will remove the display of many adverts with deemed consent on existing phone boxes, replacing them with modern LED digital displays to which the Council will benefit from 5% free screen time (circa 438 hours a year per display or 876 hours per unit), all of which will be properly maintained and can be controlled through the requirement for express consent. The adverts will help support this function and as such are in intrinsic part of the development.

The locations of the Street Hubs have been primarily identified to replace existing BT payphones, where possible and practicable, but also to provide seamless fast, free Wi-Fi service throughout the key commercial, retail and pedestrian areas within the Gloucester City Council area whereby residents, visitors and businesses can all use this service, together with the additional benefits of the Street Hub. In addition, within the Gloucester City Council, some Street Hubs are proposed in areas whereby tourists enjoy recreational facilities, as such services will enhance the overall tourist experience of the city.

In line with the requirements of the NPPF and Code of Best Practice, the proposal would see the relocation of an existing and established communications site to a more contemporary designed and multifunctional unit, in fitting with the modern world. This in itself is not a valid reason to conclude that it is not appropriate at the specific location. However, it is accepted that this in itself is not the sole consideration assessing whether the proposal would be considered as being appropriate at the specific location.

Paragraphs 3.2 – 3.3 of the Code of Best Practice explain that there is now far greater emphasis that visual impact should not override requirements to achieve infrastructure coverage to a particular area, particularly with the need to support the massively growing and intensifying demand for mobile communications across the UK. Indeed, in terms of looking to meet operational needs, the Code of Best Practice emphasises that the NPPF now applies a reduced policy test compared to previous guidance. This helps clarify than an operator is only required to satisfy the normal test of acceptability having regard to all material planning circumstances, rather than looking for the 'optimum' solution as required under the former PPG8.

In this respect, by relocating the existing structure, the visual amenity of the area would not be detrimentally or demonstrable impacted upon to any significant further degree. When considering the long-established use of the site for communications, this would ensure any such upgrade and relocation remains acceptable in terms of any resultant visual impact. This is in line with the requirements of NPPF which supports equipment

which is sympathetically designed and keeps the number of masts to a minimum [paragraph 113] and The Code of Best Practice.

In terms of the Councils Placemaking and Sustainability strategy, the proposal would assist in the delivery of a Connected Place. Street Hubs are free to use, fully accessible community assets connecting and improving local streets in urban areas. At no cost to taxpayers or end users, Street Hubs provide communities with an unprecedented suite of essential urban tools with the consequence of the economic and social benefits that come from this.

When assessing the application site in terms of impact on visual amenity and pedestrian safety, the following comments are made.

There is existing street furniture typical of a busy urban high street including bus shelters, street lighting, signage/advertising, refuse bins and an existing BT payphone. As the proposal would result in a replacement of existing BT infrastructure which has been a long-established feature within the streetscene with a new modern design Street Hub, with a significantly reduced footprint and overall volume to that of the existing phone box to be removed, the proposal would therefore not result in any increased visual and/or physical clutter within the general streetscene. To this end, the Council confirmed in their pre-application response that there would be no highway safety concerns as a result of the proposal. Additionally, given that the proposed unit has only a small width increase from that of the existing phone box of circa 300mm, it is not considered that the proposal would have any resultant impact in respect of pedestrian safety or flow as there would be a remaining footpath width of circa 4.0 meters on one side of the unit and 5.2 meters on the other in this instance.

In determining the above, consideration has been given to the fact that the Department for Transport Manual for Streets (2007) confirms that there is no minimum width for footways. It suggests that in lightly used streets, the minimum unobstructed width for pedestrians should generally be 2000mm, and that is areas of higher pedestrian flow the quality of the walking experience can deteriorate unless sufficient width is provided. Inclusive Mobility (2002) advises that ideally the width of the footway should be 2000mm to facilitate two people in wheelchairs to pass each other comfortably. Where this width is not possible, a clear width of 1500mm should be provided, with an absolute clear minimum width of 1000mm in exceptional cases. The phrase ‘clear’ refers to the effective width taking into account permanent obstacles on the footway such as streetlamp standards, trees, telegraph poles, bus shelters for example. Furthermore, the Disability Discrimination Act (DDA) itself recommends a minimum footway width of 1200mm. The proposed location of the Street Hub Unit exceeds the recommendations laid out by Inclusive Mobility and the DDA in this instance.

In respect of amenity consideration, as stated the proposal would see the removal of an existing and somewhat run-down phone box that could be considered as having a negative impact on the streetscene setting, with a new modern Street Hub unit. The proposed Street Hub has a much more slender and slimline profile than that of the existing phone boxes and would therefore be comparable in form and appearance to existing freestanding units of a similar form than that can be found elsewhere within

the Council area. This was considered in a recent appeal decision (ref: APP/Z5630/H/3209488) for a similar structure to that being proposed whereby the Inspector determines the following;

> *"Therefore, due to the smaller footprint and slender profile of the proposed kiosk, the proposal would not be visually intrusive or create visual street clutter. The proposal would also not represent an incongruous addition due to its similarities with the existing digital signs within the town centre." (Appeal ref: APP/Z5630/H/3209488, 2-6 Fife Road, Kingston upon Thames).*

This consideration was reiterated in a further appeal (ref: APP/N5660/W/18/3199793) for a similar proposal, whereby the Inspector considered the following;

> *"..with the modest scale of the proposed InLink unit I find it difficult to accept the argument that the development would be perceived as having an adverse effect on visual amenity…" – (Appeal ref: APP/N5660/W/18/3199793, Waterloo Station, Lambeth).*

In addition to the above, while the site is not located within the boundary of the Conservation Area in assessing any proposal consideration has to be given as to the existing streetscene setting. In this regard, along with the existing and run-down telephone box, there are numerous examples of street furniture of a similar nature to that being proposed, which should be considered when assessing any potential impact on the setting and/or appearance of the area. As a result, the character of the locale in this instance, with particular regard to street level, is not exclusive of similar structure to that being proposed and therefore the proposal in this instance should not be considered as being visually incongruous within the existing streetscene setting. Unlike many previously accepted forms of street furniture within the locale as the proposal would see the removal of a bulky, outdated and in somewhat of a state of disrepair phone box with a much slimmer profile modern structure, then there is an argument to be made that the proposal would in fact result in a visual enhancement of the area in this regard, particularly as it would not be, even if considered on its own, as being out of appearance with similar units within the streetscene.

In considering the above, the proposed location would represent the best solution in terms of material planning considerations in this instance.

In respect of digital infrastructure and economic development, these new Street Hubs are the perfect form of infrastructure for positive change, enabling councils to collaborate and configure infrastructure to support smarter, safer and more sustainable places for residents, visitors and businesses alike. BT is moving public connectivity forward, evolving their existing and long-established payphone estate further with a move from the 1st Generation 'InLink' units that have seen deployment throughout the country, to the proposed Street Hubs, a sleek modern answer to the demands of a digitally connected, converged-media society and at no cost to the Council.

As such, it is considered that the proposal would not be contrary to the respective Development Plan policies and would also be consistent with National Policy consideration in this instance.

Economic and Social Benefits

The NPPF strongly supports sustainable development. Mobile communication plays a significant role in sustainable development. Being able to access the internet via a mobile device allows people to access a wide range of central and local government services, buy groceries, manage finances, apply for jobs/university and carry out school projects, send emails, download applications, send and receive instant messages, streaming and downloading data to name just a few of the benefits of being able to use an internet enabled handheld device. It also allows people to work from home or on the move without the need to return to the office. This reduces travel time, carbon emissions and increases the speed in which information is processed/shared. This fully complies with the aims of the NPPF to minimise the effects on climate change by reducing the need to travel and as a consequence the carbon footprint.

It is therefore clear that the Government places significant importance on reliable communications and as such the Planning Inspectorate gives significant weight to the public benefit arising from local service provision. The issue of benefits and planning balance is considered in Appeal Ref: APP/L1765/W/18/3197522 (Land at the junction of Andover Road and Athelsan Road, Winchester for the erection of a 17.5m street works pole).

The Inspector found at Paragraph 9 'The Government places a high priority on the provision of high-quality communications. The National Planning Policy Framework (the Framework) at Paragraph 112 states, *"Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections".*

In addition to the above, this issue of public benefit and planning balance was also considered in Appeal Ref: APP/X5990/W/3162918 (55-59 Oxford Street). In this case, the Inspector found at Paragraph 20 *'Whilst I have paid special attention to the desirability of preserving or enhancing the character or appearance of the conservation area, the above factors lead me to conclude that there is less than substantial harm to the character and appearance of the existing building and the SCA. Therefore, whilst there is some conflict with WCP and UDP policies, the less than substantial harm that I have identified is outweighed by the clear public benefits of the proposal in maintaining and improving vital communications infrastructure at an important location'.*

Mobile connectivity is essential to the future success of the economy. The combined value of 4G and 5G mobile connectivity is estimated to add £18.5bn to the economy by 2026 (Councils and Connectivity Sept 2018). Mobile connectivity is essential to

creating a better society. Digital inclusion can help people gain employment, become more financially secure and improve health and well-being. Mobile connectivity is also essential to fulfilling the potential of new technologies. Innovation such as artificial intelligence and connected cars will change how we work, spend our leisure time and run our public services.

Paragraph 38 of the NPPF (2021) states that:

'Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible'.

Providing high Quality digital infrastructure within the area fully meets this aim of the NPPF. The social and economic benefits are significant material considerations which should be weighed against any visual impact associated with the proposed development at this location, whether a conversion or relocation as is the case in this instance. In addition to the above, HM Treasury outline such benefits in its report 'Fixing the Foundations: Creating a more Prosperous Nation' (July 2015). Paragraph 7.1 states that reliable and high quality fixed and mobile broadband connections support growth in productivity, efficiency and labour force participation across the whole economy. They enable new and more efficient business processes, access to new markets and support flexible working and working from home.

Paragraph 7.2 goes onto highlight strong support for high quality communications infrastructure. It states:

'By reducing regulatory red tape and barriers to investment, the government will support the market to deliver the internationally competitive fixed and mobile digital communications infrastructure the UK's businesses need to thrive and grow, and which will enable the UK to remain at the forefront of the digital economy. The government is working with business so that the market can play the lead role in delivering against the ambitions set out in the Digital Communications Infrastructure Strategy, published in March, of near-universal 4G and ultrafast broadband coverage'.

Indeed, MPs have noted in parliament that the UK's Superfast Broadband connectivity was 'relatively poor'. As such, there has been continuing and growing strong national support for a high quality communications infrastructure that is fit for purpose and helps promote the UK as a world leader in this regard, particularly with the roll-out of 5G coverage.

Further to Governments commitment to improve connectivity, on 24th November 2016 the new 'permitted development' rights for telecommunications operators came into force, designed to lift the restrictions on mobile operators such is the significance of the significant weight that Government places upon the benefits attached to modern connectivity.

In October 2016, there was also the BIG Infrastructure Group (as chaired by MP Grant Shapps) Report release calling on operators to improve their network. This is signed and has comments from numerous MP's nationally. A National Needs assessment – A Vision for UK Infrastructure was also published in October 2016. It sets out the infrastructure needs for the UK which includes the importance of digital technology. An extract of this assessment can be found below:

'A lack of sufficient digital connectivity has a detrimental effect on business operations, productivity and output and hence competitiveness in the global marketplace. Securing digital connectivity is thus critical to the UK's long term prosperity. A key challenge for the digital sector is a persistent digital divide between those who have access to the latest technologies and those who do not, with resulting social and economic exclusion, particularly as dependence on e-services and digital communications increases'.

The Assessment goes on to note that 'Universal digital connectivity would serve as an equaliser of economic opportunity in that it enables participation in a modern digital economy'. This Assessment goes on to further explain the consequences of a lack of coverage and the effects this has on social and economic prosperity. This clearly highlights the importance of maintaining high quality 2G, 3G and 4G coverage to this busy area a short distance to the east of the capital, where the social and economic benefits significantly outweigh the environmental considerations.

Ministers from the DCMS and MHCLG wrote to all CEOs of the Council's in England (March 2019) setting out the position in respect of supporting investment in high-quality, reliable digital connectivity. The Government acknowledges that such infrastructure is essential for communities to benefit from faster economic growth and greater social inclusion. Ministers state:

'it is essential to keep pace with growing demand for internet bandwidth and mobile data from local businesses, residents and those who visit our communities. As outlines in the Future Telecoms Infrastructure Review, the Government would also like to see national full fibre coverage by 2033. We would also like the UK to be a work leader in 5G, with the majority of the population covered by a 5G signal by 2017. We are writing to ask for your help in supporting the investment necessary to achieve these objectives.

Recent years have seen substantial investment in mobile and fixed digital infrastructure across the UK. While mobile coverage across the UK has been significantly improving, there are still too many areas where coverage is poor. The UK has now achieved 95% superfast broadband coverage but still only 6% full fibre coverage.

We need to create the market and policy conditions to support the large-scale commercial investment required to extend and future-proof digital connectivity. A key part of this is making it easier for operators to deploy infrastructure. To help to achieve this, the Government recently reformed the Electronic Communications Code – the statutory framework which underpins agreements between communications network

providers and those in both the private and public sectors who can provide sites for the installation of network equipment. The purpose of the reform was to make it easier and more cost effective for communications network providers to deploy and maintain digital infrastructure.

Local Authorities have an essential role to play as site providers. As Chief Executives, you can support investment in digital communications infrastructure by ensuring your organisations have policies and procedures in place that promote effective engagement with the digital communications industry and minimise barriers to deployment'

The proposed relocation will continue operators to provide high quality coverage and capacity, supporting the Government's aim to 'focus on ensuring everyone is connected to the information highway'. This fully meets the aspirations of the NPPF and the Council's strategic strategy in general terms.

Trials have already begun across the UK to demonstrate the potential of 5G and improved digital infrastructure and how it can improve and drive productivity and efficiency. In June 2019, West Midlands 5G partnered with BT and University Hospitals Birmingham to trial the UK's first 5G Connected Ambulance. Real-Time communications between the paramedics and the hospital doctors enabled the effective diagnosis of the patient at an early stage of care. The trial showed how a paramedic performed a remote-controlled ultra-sound scan on a patient in an ambulance over a public 5G network. These trials show how digital connectivity and technology can reduce patient waiting times and save lives (Source: WM5G).

The way digital infrastructure works, it is closely connected with the Smart City agenda and will enable centralized control of lots of different street infrastructure owned or managed by councils, such as streetlights, water meters and bus stops. The Gloucester City Council is fully committed to being connected and acknowledges the benefits derived from this. As such it needs the 21st century infrastructure to enable this objective to become a reality. A relocation at this location enabling modern communication service provision to the surrounding area will ensure that this aspiration is fully met.

Reliable mobile connectivity and digital infrastructure is essential. It is however certainly more significant now since the global pandemic hit. Online Nation 2020 produced by Ofcom to look at what people in the UK are doing online and industry trends amongst other things, found in relation to the increasing importance of mobile connectivity:

- 71% of all measured time spent online was on smartphones.
- 35% of internet users only accessed the internet on mobile devices (smartphone or tablet).
- In 2020, a fifth (22%) of UK adults have a smart speaker in the home and 11% of all UK households own some kind of 'smart home' technology (including devices such as smart home security, smart lighting and smart heating).

Reinforcing the importance of mobile connectivity during the pandemic, the Online Nation 2020 report found:

- Covid-19 impact: time spent online reaches record levels
- In April 2020, internet users in the UK spent an average of 4 hours 2 minutes online each day, 37 minutes more each day per online adult compared with January 2020.
- In April 2020, the reach of education (+3 percentage points), health (+5pp) and government (+5pp) sites had all grown since January
- … between January and April 2020; Houseparty increased from 175,000 to 4 million; Zoom reached 13 million adult internet users in April, up from 659,000 in January.
- In February 2020, 73% of UK adult internet users used online text messages, 54% use online voice calls, 35% use video calls and 55% use emails, at least weekly. Nine in ten adult internet users used any of those four services at least weekly.
- Most internet users use online messaging and calling services and use increased during the coronavirus pandemic
- Until early this year, online video calling was used much less than other online communication services, with 35% of online adults using online video calling at least weekly in the 12 months to February 2020.26 In May 2020, this had doubled to 71% of online adult consumers using online video calling services at least weekly, with 38% using them at least daily. Our research suggests that 7% of adult internet users used video calling for the first time as a result of the coronavirus pandemic.
- 87% of the UK adult population use the internet • Mobile only use has increased dramatically
- In 2019, … the proportion who use only mobile devices has shot up: 35% of internet users accessed the internet solely via a smartphone or tablet in 2019 – a 10 percentage point (pp) increase compared to 2017. Across computers, tablets and smartphones, 71% of time spent online in September 2019 was on smartphones.

In March 2020, when OfCom finalised the rules for the next mobile airwaves auction, Philip Marnick, Spectrum Group Director at Ofcom noted ‘Demand for getting online, on the move is soaring, with mobile customers using nearly 40% more data year on year. So, releasing these airwaves will bring a much-needed capacity boost – helping mobile customers get a better service. We’re also releasing more airwaves to help cement the UK’s place as a world leader in 5G.’ this is also the case for improved digital infrastructure

It is clear from the above that reliance on mobile connectivity was increasing before COVID 19 and has increased since the pandemic. It is fair to say the increased use of and expectation for reliable mobile digital connectivity will see this upward trend

continue. Residents, businesses and commuters will all be significantly affected if the critical replacement infrastructure is not permitted.

It is therefore imperative that the operator continues to invest in ensuring that the latest technologies are available on its network, so that customers are able to continue to use their handheld devices wherever they are, for whatever reason, for the purposes in which they were purchased.

Providing the latest digital infrastructure to enable improvements in digital technology empowers and enables residents to have the highest quality of life, supports the creation of high-quality jobs and achieves the maximum productivity levels. It will help England achieve its ambition of being a world-leading digital country and one which its businesses, public service providers and citizens are using digital technology by default and to the fullest to grow their businesses and improve productivity to access skills, training and employment opportunities to address global challenges that have a local impact such as ill health, social isolation, and pollution; to improve living standards and well-being; and to improve the quality and value for money of public services.

5G and improved digital infrastructure will provide faster and more reliable connectivity leading to greater opportunities. We will experience new technologies that will help us become more efficient and save costs as an individual or business. Advanced healthcare facilities performing surgeries remotely will be made possible along with freeing up more GP time through better online facilities improving health and social care. It will allow the greater Internet of Things (IOT) transformation, with better connected devices, the IOT will enable us to control devices more independently, it will help councils and businesses deliver services more efficiently including transport and logistics with connected parcels and fleet tracking; environmental monitoring with sensors monitoring air quality and water pollution in real time; smart retailing; industrial applications, enabling business to improve productivity e.g. through predictive maintenance and real-time analytics.

A National Needs Assessment – A Vision for UK Infrastructure was published in October 2016. It sets out the infrastructure needs for the UK which includes the importance of digital technology:

> *'A lack of digital connectivity has a detrimental effect on business operations, productivity and output and hence competitiveness in the global marketplace. Securing digital connectivity is thus critical to the UK's long-term prosperity. A key challenge for the digital sector is a persistent digital divide between those who have access to the latest technologies and those who do not, with resulting social and economic exclusion, particularly as dependence on e-services and digital communications increases' (page 66 A National Needs Assessment)'.*

The Assessment goes on to note that 'Universal digital connectivity would serve as an equaliser of economic opportunity in that it enables participation in a modern digital economy'. Therefore, this Needs Assessment further explains the consequences of a lack of coverage and the effects this has on social and economic prosperity. This clearly highlights the importance of providing new 5G coverage to this urban area of

Gloucester where the economic benefits will outweigh social and environmental considerations.

Practical Applications of 5G Connectivity as Example of Material Socio-Economic Benefit:-

Education:

The relationship between 5G and education is evolving at a massive rate with educators exploring the relevance of Virtual Reality (VR) technologies for education and training. Crucially, VR can support remote learning, allowing students a presence in the classroom even when working elsewhere.

5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high-definition images and video), increased capacity and heightened security will also allow learning on the job, thanks to technologies such as Augmented Reality (AR) goggles, which can give engineers real-time instructions on how to fix a machine on a production line, for example.

Health:

Patients across the country are now becoming accustomed to relying on remote healthcare services such as NHS 111, virtual GP appointments, and ordering online deliveries of essential medical supplies.

5G will prove critical in providing the infrastructure required to deliver remote health services over the next decade. By design, 5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high-definition images and video), increased capacity and heightened security are going to be fundamental in scaling the patient benefits of remote healthcare and keeping medical records secure and private. For instance, trials have shown that connecting ambulance crews to expert resources using 5G allows paramedics to work with doctors and conduct specialist procedures in real time whilst on the road.

The proposed relocation will continue operators to provide high quality 2G, 3G and 4G coverage and capacity, as well as 5G when applicable, supporting the Government's aim to 'focus on ensuring everyone is connected to the information highway'. This fully meets the aspirations of National Policy.

4.0 Maintenance and Servicing

Maintainability and durability were key considerations in the design, with regular cleaning and servicing planned. BT is responsible for the management of Street Hub services with each unit physically inspected weekly across the estate.

Inspection Regimes

The Street Hubs are visited every two weeks for cleaning, by hand and with pressure washers. The materials used make this process easy with defined materials and

processes. Whilst cleaners are on site, they check for damage and ensure the tablets and screens are working. In addition, BT's in-field quality inspection teams visit at least every two weeks on an alternative schedule to their cleaning team, performing several checks including (but not limited to):

- Full walk-around with supporting photos to check for damage, graffiti and black screens
- Functionality checks on the tablet to test calls, maps, 999 and USB charging.

BT can also send out emergency visits if reported as necessary by internal sensors.

Monitoring and Repair Management

Street Hubs are monitored remotely 24/7, with this being the primary mechanism to spot faults with the above local inspections ensuring the effectiveness of this monitoring. Once identified, BT have processes to resolve issues within agreed service levels. Most will be resolved within three working days, with safety and power issues having a more rapid resolution target than cosmetic issues like graffiti.

Design Materials

High-quality materials have been used to ensure longevity, holding up to abuse and diminishing scratches. These include:

- A galvanised mild steel structure, powder coated external grade aluminium exterior
- Painted powder coated aluminium main casing – attractive, durable, easy to service, and cooling
- Displays fronted by tempered and laminated glass to reduce glare
- RF transparent radio compartment

The modular design of exterior and interior components makes servicing simple and economical.

Future Upgrades

BT plan to make changes as needed to address identified faults or to improve services. Whilst some may involve physical attendance at the unit, the majority will be done remotely via software upgrades. All updates are rigorously quality assured before release.

5.0 Health and Safety

Telecommunications planning guidance states that it is not for the local planning authority to seek to replicate through the planning system controls under the health and safety regime as it is a matter for the Health and Safety Executive.

The Government guidelines state that provided a proposed base station meets the ICNIRP guidelines for public exposure, then it should not be necessary for the local planning authority to consider the impacts of health concerns.

The proposed Street Hub will not be fitted with small cell technology integrated inside the unit casing. When BT do opt to implement small cell technology within this Street Hub, however, this will be managed through the submission of a license notification under Regulation 5 of the Conditions and Restrictions of the Communications Act 2003 (as amended) in respect of upgrading works to an existing telecommunications mast. This will be the chosen route as these works constitute permitted development under Class A of Part 16 of The Town and Country Planning (General Permitted Development Order) 2015 (as amended). Regardless of the absence of small cell technology upon deployment, an ICNIRP certificate is attached to this application to confirm that the equipment complies with both national and international emissions standards and that the proposed design and location allows the equipment to be well within the parameters set by the ICNIRP standard.

6.0 Conclusion

The Street Hub, in providing free Wi-Fi connectivity, improved 4G and 5G coverage, air quality monitoring and other valuable services to shoppers, tourists and others (thereby encouraging greater use of the city centre and enhancing recreational areas) is part of the wider digital connectivity expected in modern cities. It is precisely the type of high-speed digital infrastructure that the government is seeking to support as part of the presumption in favor of sustainable development.

The proposed Street Hub is considered to gain support in terms of its location for Wi-Fi connectivity, and its appearance in terms of overall impact on the existing streetscene. Street Hubs are of a high quality, accessible design that would be a significant improvement over the existing payphones in the Council's area, along with the associated direct public benefits including;

- Ultrafast public and encrypted Wi-Fi
- Access to public services
- Multiple accessibility options
- Powered by 100% renewable carbon-free energy
- Inspected weekly and cleaned at least every two weeks, monitored 24/7
- Secure power-only USB ports for rapid device charging
- Free phone calls Direct 999 call button
- Display community and emergency (i.e. police) awareness messaging
- Environmental sensors to measure air quality, noise, traffic and more.
- Improved 4G and 5G coverage to local communities
- 876 hours of free council advertising per unit per year

As such, the Council should support the proposal in the interest of the significant public benefits which would outweigh any harm caused when weighing up all material planning considerations. Both the planning application and accompanying application for advertisement consent should be timeously approved, with appropriate conditions attached if necessary.