

Planning and Building Control
Liverpool City Council
Cunard Building
Water Street
Liverpool
L3 1AH

30th April 2021

Dear Planning and Building Control

**BT STREET HUB PROJECT
FULL PLANNING AND ADVERTISING APPLICATION
LIV003 – OUTSIDE NO 18-20 CHURCH STREET, OPPOSITE THE JUNCTION WITH WILLIAMSON STREET,
LIVERPOOL, L1 3AP**

We write on behalf of our client, BT, following previous discussions held between, BT, Mono and Liverpool City Council regarding the installation of several BT InLink units in Liverpool city centre back in 2018. More recently we sought to engage with the Local Planning Authority and sent a pre-application consultation email in March 2021 to introduce the BT Street Hub project and sites, including this one, where we are looking to propose a new Street Hub unit.

To recap, the InLinkUK service was first launched in 2017 and since then 494 InLink structures were rolled out in 23 cities. These units offered 1Gbps free public Wi-Fi, free UK calls, USB charging, included an emergency services button and a range of other digital services for those in the vicinity. HD displays on the sides are used to carry advertising which helped to fund the units. However, the screens can also be used to show local content free of charge.

You will be aware that applications for the installation of BT InLink units in Liverpool were never submitted. This was due to the incumbent supplier, InLinkUK entering administration and therefore becoming unable to supply units to BT, hence this product is no longer available. Since then, BT have been working over the last 18 months on a new and improved unit, the BT Street Hub, that they are keen to rollout in your City.

BT Street Hub Project

BT is continuing to move forward with public connectivity and Street Hubs will provide a sleek and modern answer to the demands of a digitally connected society. BT Street Hub has all the existing benefits of the previous structure but with better Wi-Fi range, air quality monitoring, insight counting and small cell 5G mobile connectivity. The addition of the 5G small cells to Street Hubs is very much in line with current UK Government's guidance on telecommunications developments and the National Infrastructure Strategy. Since the start of the original BT InLink project, the Government's commitment towards telecommunications deployment has been strengthened and NPPF 19, para 112 confirms that, *'Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G)'*.

The Street Hub will help future proof the high street making them smarter, safer, and more sustainable. Investment in the high street is at an all-time low but that has not slowed BT down as they look to ramp up their rollout of new Street Hubs across the UK. They are continuing their commitment to invest and improve in the high street one Street Hub at a time and therefore decluttering these environments with the associated removal of existing BT phone boxes. Due to the increased functionality of the new Street Hub, a slightly larger structure than the one that was originally proposed unit is required. We have appended some imagery of the new structure, which is 34cm longer than the original unit, but only 7cm wider and 8.5cm taller.

Mono have previously entered into paid pre-application consultation with the LPA for a number of InLink structures across the city. On the 3rd August 2018, we had a walkaround of the sites with Richard Byrne and Gemma Escoffery. Responses were received on 21st September 2018 and a meeting was held on 1st November 2018 with representatives of BT, Mono and the Council at the Cunard Building to discuss the rollout of InLinks and the overall BT strategy for Liverpool. After this meeting the sites identified for InLink by Mono were put on-hold and not submitted as formal planning applications as at the time in parallel there were various ongoing appeals for InLink sites and associated removals that a previous agent had progressed. More recently, we wrote to your LPA on the 23rd March 2021 to introduce and explain the new BT Street Hub project. No response has been received for this particular site, however when finalising the Street Hub proposal, we have taken onboard the comments made in relation to the original InLink proposal. In this respect, this is a formal application for full planning permission and consent to display advertisements, relating to the installation of 1no. BT Street Hub at the entitled address and the associated removal of 2no. BT phone boxes.

This submission comprises of the following documents:

- Site specific Planning and Design and Access statement;
- 1App forms and certificates generated by the Planning Portal;
- The prescribed fee of £928 paid directly to the Council via the Planning Portal;
- Drawings including location plan map, proposed site plan, existing and proposed elevations;
- BT Street Hub Product Statement giving full details of the proposed structure;
- BT Street Hub Anti-Social Behaviour Management Plan;
- 'The Institute of Lighting Professional's 'Professional Lighting Guide 05: The Brightness of Illuminated Advertisements' 2015 for your reference;
- International Commission on Non-Ionizing Radiation Protection (ICNIRP) certificate.

Where possible, we have specifically drawn the red line around the proposed BT Street Hub and any associated BT phone boxes found immediately adjacent to try and encompass the removals as well. BT are a statutory undertaker on adopted highways controlled land, so we have notified the Highways Department and where applicable any registered owner(s) as part of our planning submission.

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

Yours sincerely

Lewis Baldwin

Lewis Baldwin BA, MSc

Planning and Acquisitions

Mono

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For and on behalf of BT as a duly authorised agent

Planning, Design and Access Statement

Our Ref.	LIV003
Lat/Long	53.405240, -2.98482
Project Type	BT Street Hub
Conservation Area	Not within a Conservation Area
Statutory Listed Buildings in vicinity	Compton House, II (1206203) 25 and 25A Church Street, II (1356328)

As part of our collaborative approach to connecting and improving local streets, Full Planning Permission and Express Advertisement Consent is sought for the installation of one (1) BT Street Hub and removal of two (2) associated BT payphones.

Proposed Install (Site Location Photo)

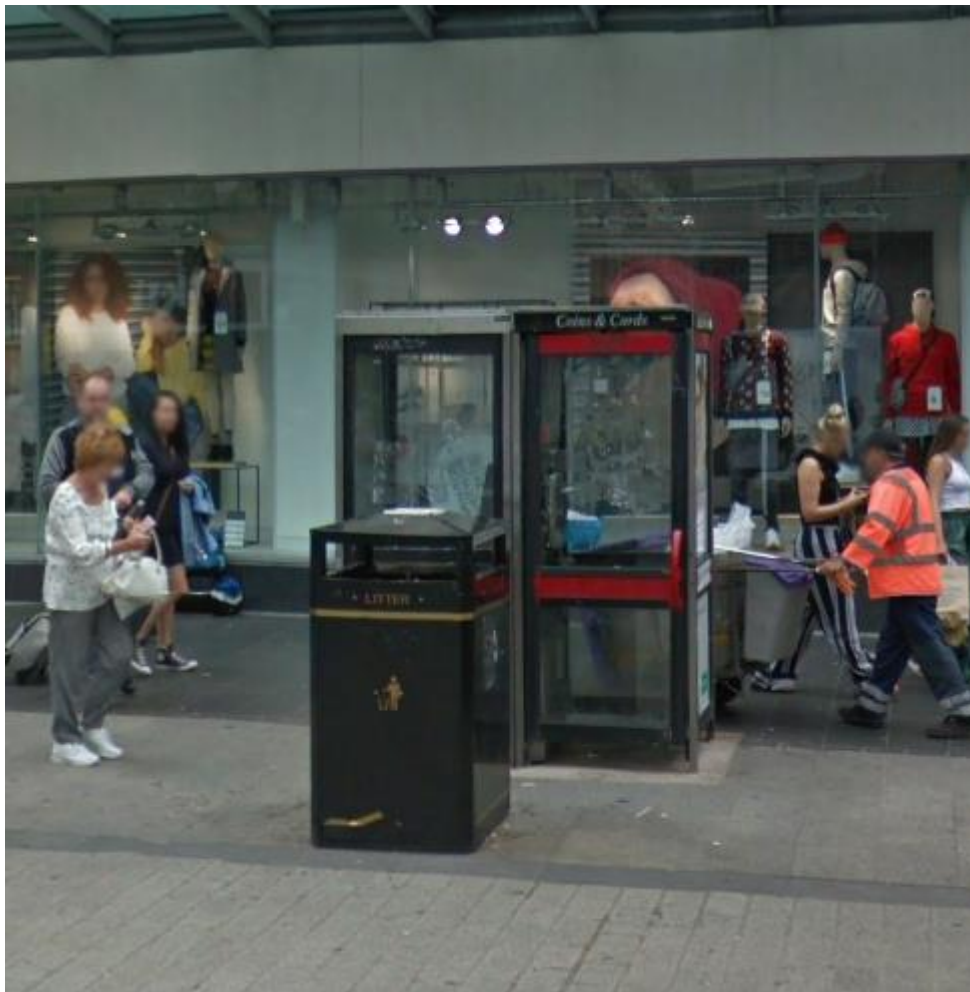
Outside no 18-20 Church Street, opposite the junction with Williamson Street, Liverpool, L1 3AP

NB – Existing BT kiosks to be removed in association with an allowed InLink appeal to be installed elsewhere.



Proposed Removals

X2 BT kiosks - Outside Primark, no48 - 56 Church Street, Liverpool, L1 3AY

**PLANNING LEGISLATION & POLICY**

This application is for full planning permission under section 62 of the Town and Country Planning Act 1990 [the 1990 Act] and express advertisement consent under regulation 9 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 [the Regulations]. Applications for full planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise (Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the 1990 Act). Under the advertisement Regulations, Express Consent is required for the advertisement element, notably the 2no digital screens on each side of the Street Hub. As per regulation 3 of the Regulations, applications for Express Advertisement Consent must be determined in the interests of amenity and public safety, considering (a) the provisions of the development plan, so far as they are material, and (b) any other relevant factors.

UK Digital Strategy

Digital connectivity is now considered to be a utility, and modern life is increasingly impossible without it. Connectivity drives productivity and innovation and is the physical underpinning of a digital nation. Being connected is fundamental to the success in our modern world and Street Hub provides a cost-free way for communities to get online and take advantage of available opportunities. The Government

has committed that every individual and every business should have the skills and confidence to seize the opportunities of digital technology and have easy access to high-quality internet wherever they live, work, travel or learn. An update to the UK's Digital Strategy has unfortunately been postponed due to the Covid-19 pandemic but is now due to be published in 2021 and drafts indicate continues to promote the government's policy of improved digital connectivity.

National Infrastructure Strategy

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

National Planning Policy Framework

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

Paragraph 109 - Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Paragraph 110 - Within this context, applications for development should: [...] c) create places that are safe, secure and attractive, which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards.

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

Paragraph 112 - Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. Policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).

Paragraph 113 - The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate.

Paragraph 115 - Applications for electronic communications development (including applications for prior approval under the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development.

Paragraph 116 - Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.

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

Paragraph 132 - The quality and character of places can suffer when advertisements are poorly sited and designed. A separate consent process within the planning system controls the display of advertisements, which should be operated in a way which is simple, efficient and effective. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.

LOCAL PLAN POLICY

Liverpool Unitary Development Plan

The Unitary Development Plan (UDP) is a statutory document that plays a major role in shaping the future of the city. It shows what every piece of land in the city can be used for. It was adopted in November 2002. Under the new planning system, the UDP is a 'saved plan', which means it is a Local Plan Document within the Local Plan framework.

GEN6 – Transportation

The Plan aims to provide a balanced provision of transport infrastructure which:

- i. provides access to employment, leisure, retail and other facilities for all of the City's residents;
- ii. meets the transport needs of people who are economically and socially disadvantaged;
- iii. allows for the safe, efficient and easy movement of goods into and throughout the City, in order to help secure the regeneration of the local economy;
- iv. protects & enhances the environment through reducing the reliance on the private car.
- v. promotes, in conjunction with the Passenger Transport Authority, investment in the public transport network and associated facilities;
- vi. improves facilities for cyclists and pedestrians;
- vii. provides a framework for investment in the efficiency of the road system; and
- viii. reduces the availability of car parking facilities which would attract car borne commuters.

GEN9 – Liverpool City Centre

The Plan aims to maintain and enhance the City Centre's role and function as a regional centre by:

- i. furthering economic development;
- ii. securing new retail investment in the Main Retail Area;
- iii. promoting the development of the Paradise Street Development Area;
- iv. improving access and circulation;
- v. enhancing the living environment;

- vi. improving the general physical environment; and
- vii. promotion, marketing and gathering of information

HD5 – Development Affecting the Setting of a Listed Building

Planning permission will only be granted for development affecting the setting of a listed building, which preserves the setting and important views of the building. This will include, where appropriate:

- i. control over the design and siting of new development;
- ii. control over the use of adjacent land; and
- iii. the preservation of trees and landscape features.

HD18 – General Design Requirements

When assessing proposals for new development, the City Council will require applications to comply with the following criteria, where appropriate, to ensure a high quality of design:

- i. the scale, density and massing of the proposed development relate well to its locality;
- ii. the development includes characteristics of local distinctiveness in terms of design, layout and materials;
- iii. the building lines and layout of the development relate to those of the locality;
- iv. external boundary and surface treatment is included as part of the development and is of a design and materials which relate well to its surroundings;
- v. all plant machinery and equipment are provided within the building envelope or at roof level as an integral part of the design;
- vi. the development pays special attention to views into and out of any: adjoining green space, or area of Green Belt;
- vii. the development has regard to and does not detract from the city's skyline, roofscape and local views within the city;
- viii. the satisfactory development or redevelopment of adjoining land is not prejudiced;
- ix. there is no severe loss of amenity or privacy to adjacent residents;
- x. in the case of temporary buildings, the development is of a suitable design and not in a prominent location;
- xi. adequate arrangements are made for the storage and collection of refuse within the curtilage of the site and the provision of litter bins where appropriate;
- xii. the exterior of the development incorporates materials to discourage graffiti; and
- xiii. adequate arrangements are made for pedestrian and vehicular access and for car parking.

HD25 - Advertisements

1. Consent will not be granted for advertisements which by virtue of their size, siting, proliferation, or method of display, including illumination would:

- i. be a hazard or distraction to road users to the detriment of public safety; or
- ii. dominate or otherwise adversely affect, the amenity of an area.

HD27 – Telecommunications Code Systems Operators

Proposals for masts or other structures by telecommunications code systems operators will be considered having regard to the visual impact on the built and natural environment and the technical and operational requirements of the equipment and will normally be permitted provided that:

- i. there is no suitable alternative site, structure or building that can be satisfactorily used for the purpose and that there is no reasonable possibility of sharing existing facilities;

- ii. the proposal does not have a detrimental effect on the amenity of adjoining premises or on the overall visual amenity or character of an area. Particular attention will be paid to the character or appearance of a listed building or a conservation area;
- iii. the proposal is designed, landscaped and screened to minimise their effect on the appearance and amenity of its surroundings; and
- iv. the proposal will replace existing masts or structures or will facilitate future network development by reducing the need for additional masts or structures.

Planning History to the Site

Mono have previously entered into paid pre-application consultation with the Local Planning Authority for a number of InLink structures across the city. On the 3rd August 2018, we had a walkaround of the sites with Richard Byrne and Gemma Escoffery. Responses were received on 21st September 2018 and a meeting was held on 1st November 2018 with representatives of BT, Mono and the Council at the Cunard Building to discuss the rollout of InLinks and the overall BT strategy for Liverpool. After this meeting the sites identified for InLink by Mono were put on-hold and not submitted as formal planning applications as at the time in parallel there were various ongoing appeals for InLink sites and associated removals that a previous agent had progressed. More recently, we wrote to the Local Planning Authority on the 23rd March 2021 to introduce and explain the new BT Street Hub project. No response has been received to date for this particular site, however when finalising the Street Hub proposal, we have taken onboard the LPA comments made in relation to the original InLink unit proposed here.

Matters considered in the original site identification were the preference on locations with wide pavements, the whereabouts of existing BT kiosks that could be removed in association and a new units relationship with existing street furniture, so as to avoid undue proliferation and clutter wherever possible. It should be recognised that BT's legacy estate of payphones has grown organically over the years, in which their whereabouts can now sit in environments that have changed dramatically around them amidst an ever-evolving society with changing connectivity demands. BT has a universal service obligation with Ofcom to provide a street level phone service, so the selection process of kiosks to be removed had to cater for this, although there was an appreciation by all that the use of phone boxes has dramatically changed since kiosks were first conceived but obviously WI-FI and mobile coverage has increased massively.

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

Siting Justification against Planning Policy

The introduction of any form of development within a particular environment will always be, to some degree, a noticeable addition or change to those residents, businesses and regular passers-by found closest. However, it should be appreciated that the visibility of something that is new, the change in form of something that has an established presence on-site, does not automatically result in an overwhelming adverse harm occurring. The starting point and fundamental principle applied by the applicant is always to replace existing BT call boxes with Street Hub units where they will be in-keeping

with their existing surroundings. In this regard it is seen as an opportunity to improve the street scene and meet the communication needs of today's society.

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

Justification for the siting and appearance of the proposed Street Hub, has been assessed against up to date national and local planning policies and any other material considerations. Our assessment has concentrated on whether the removal of the existing BT call boxes when balanced against the replacement with a new Street Hub at the application site, creates a significant visual harm as to outweigh the public benefits that the new unit will bring to the area in terms of its suite of inbuilt features as documented in the attached Product Statement.

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

Siting

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

Church Street is a busy pedestrianised street. The street scene context immediate to the proposed Street Hub site is primarily made up of national retail premises. In the immediate vicinity of the proposed Street Hub site there is existing street furniture including road signage, CCTV pillars, utility cabinets and litter bins. Also, there are existing BT kiosks to be removed here in association with an allowed InLink appeal to be installed elsewhere. Therefore, viewed within this street scene context, it is considered that the siting of the proposed Street Hub is appropriate.

It is noted that other forms of advertisements have been accepted in the vicinity of the proposed Street Hub that is subject of this application. There is an allowed InLink advertisement appeal (PINS Ref APP/Z4310/Z/18/3205102) outside 1-5 Church Street and across the street from the application site there is a Clear Channel double sided digital advertisement board positioned outside 9-15 Church Street that was approved by the Council in July 2018 (LPA Ref 18A/1403).

The application site is not found within a Conservation Area however, it is within approximately 50 metres of Compton House and approximately 25 metres from 25 and 25A Church Street which are Grade II Listed Buildings.

Clearly there will always be challenges faced in finding a balance between limiting any visual harm created by the siting of development upon heritage assets when weighed up against the public benefits it will bring to the area. When seen in perspective within the street scene, the proposed siting and orientation of the Street Hub is not considered to have a significant material impact on the setting or views of the aforementioned Listed Building. Indeed, it is considered that any harm upon heritage assets would be outweighed by the removal of the existing call boxes and the public benefits of the Street Hub proposal.

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

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

Appearance

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

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

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

The structure will be set within a generally commercial setting and busy stretch of road that is dominated by vehicular and pedestrian movements, hence it is well-lit throughout the day. While it is accepted that the Street Hub advertisements will be more visible during the hours of darkness or in dull conditions, its appearance would not be out of keeping with this stretch of road which is well lit by street lights, window display, other advertisements and bus shelters containing advertisement panels. In this context, the Street Hub design would not appear detrimental to the amenity of Church Street nor the setting of any nearby Listed Building.

It is concluded that the design of the proposed Street Hub is justified and its appearance is an improvement when compared to the BT call boxes that are to be removed in association. Therefore, it is considered that the appearance of the proposed Street Hub is acceptable and is in accordance with national and local planning policies.

Pavement Width

The total width of the Street Hub is 1236mm tapering down to a footprint width of 1201mm on the pavement. The Street Hub is located on a wide pedestrianised street, in which when taking into account the land that will be freed up by the removal of the onsite kiosks, then there will be ample remaining footway for the safe passing of pedestrians.

Advertisements

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

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

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

With regards pedestrian safety, the Street Hub is positioned away from any road edges on a wide section of pavement, so it would not impede pedestrian movements as ample footway width would be retained. Allowing for the orientation of the Street Hub's user interface in relation to passing motorists, the public safety of those using it would not be put at risk as they would be set off the kerb edge. Furthermore, the proposed Street Hub would be located in a position currently used by existing phone boxes. Given that the proposal would be smaller in its footprint it is deemed that the proposal would not be detrimental to ease of access and movement or the operation of the highway when compared to those present that would be replaced.

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

Planning Conditions

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

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

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

Conclusion

Street Hubs have the potential to significantly enhance the provision of local community communications facilities and services. It is precisely the type of high-speed digital infrastructure that the government is seeking to support as part of the presumption in favour of sustainable development. It will deliver social, economic, and environmental benefits by providing a suite of essential urban tools/services, including free ultrafast Wi-Fi to residents, businesses and visitors in this area.

The proposed Street Hubs structures are of a high quality, accessible design that would be a significant improvement when compared to the existing payphones that are to be replaced. We consider the proposed structure to be appropriately sited; to reduce street clutter, to improve available footway widths in the locality and not to negatively affect heritage assets or adversely affect amenity or public safety.

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