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**Our Site Ref: NPO-05**

11<sup>th</sup> May 2026

Dear Planning,

**BT Street Hub Project**  
**Full Planning and Advertising Application**  
**NPO-05 Pavement adjacent Monmouthshire House, John Frost Square, Kingsway**  
**Centre, Newport, NP20 1PX**  
**(E 331227, N 187926)**

We write on behalf of our client, BT, relating to various sites across your authority for the installation of BT Street Hubs and the associated removal of BT payphones. We had pre-application correspondence with your authority and based on the positive feedback that was received, BT are moving forward with this particular case. BT are applying to Newport Council for full planning permission and advertisement consent for installation of 1 no. BT Street Hub and removal of 1 no. associated BT payphone.

**InLink Project**

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

**BT Street Hub Project**

BT is continuing to move forward with public connectivity and benefits in which Street Hubs will provide a sleek and modern answer to the demands of a digitally connected society. BT Street Hubs



include the ability to house 5G small cells which is very much in line with current UK Government's guidance on communications infrastructure and the National Infrastructure Strategy. This is echoed in the Welsh Government's commitment towards telecommunications deployment, which has been strengthened since the conception of InLinks and Planning Policy Wales 'PPW' confirms that,

*"Affordable, secure electronic communications infrastructure is essential to people and businesses. The availability and exchange of information afforded by telecommunications ensures people are connected to important services, their communities and the wider world and is essential for long term prosperity. Fast reliable connections are essential to meet the needs of businesses and other organisations, and to those at home accessing digital services and working."*

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

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

This submission comprises of the following documents:

- Site specific Planning and Design & Access statement;
- IApp forms and certificates generated by the Planning Portal;
- The prescribed fee of £1,334 (plus VAT) paid directly to the Council via the Planning Portal;
- Drawings including location plan map, proposed site plan, existing and proposed elevations;
- BT Street Hub Product Statement giving full details of the proposed structure;
- BT Anti-Social Behaviour Management Plan;
- 'The Institute of Lighting Professional's 'Professional Lighting Guide 05: The Brightness of Illuminated Advertisements' 2023 for your reference;
- International Commission on Non-Ionizing Radiation Protection (ICNIRP) certificate.

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

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

Yours sincerely,

*Louis Freeman*

**Louis Freeman**

Acquisition & Planning Surveyor

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07443678144

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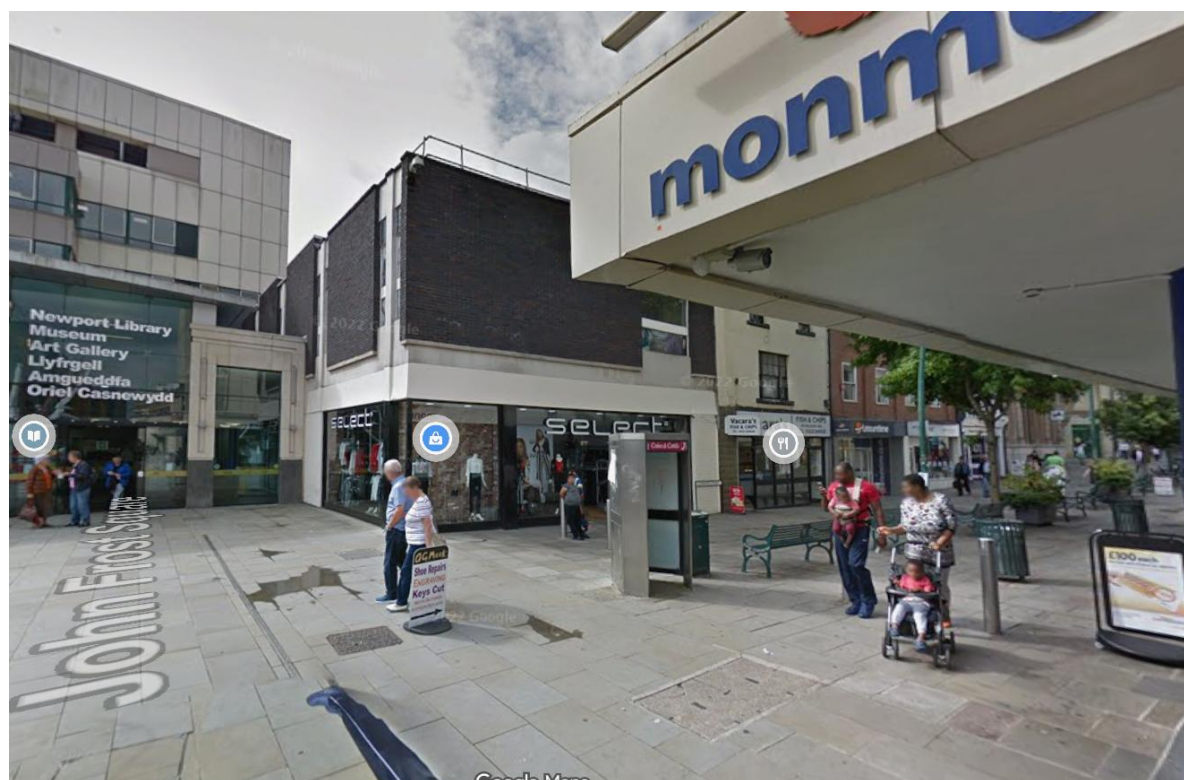
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## Planning, Design and Access Statement

|           |                                                                                                     |
|-----------|-----------------------------------------------------------------------------------------------------|
| Our Ref.  | <b>NPO-05</b>                                                                                       |
| Address   | <b>Pavement adjacent Monmouthshire House, John Frost Square, Kingsway Centre, Newport, NP20 1PX</b> |
| Lat/ Long | <b>51.585975, -2.994036</b>                                                                         |
| Site Type | <b>Direct Conversion</b>                                                                            |

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

### Existing Site – Image taken from Google Streetview:



### Photomontage of the Proposed Installation:



### Proposed Kiosk Removal

Tel: 01633 223 548

Address: Pavement adjacent to Monmouthshire House, John Frost Square, Kingsway Centre, Newport, NP20 1PX

### UK Digital Strategy

Digital connectivity in 2026 is now considered to be a utility, and modern life is increasingly impossible without it. Connectivity drives productivity and innovation and is the physical underpinning of a digital nation. Being connected is fundamental to the success in our modern world and Street Hub provides a cost-free way for communities to get online and take advantage of available opportunities. The Government has committed that every individual and every business should have the skills and confidence to seize the opportunities of digital technology and have easy access to high-quality internet wherever they live, work, travel or learn.

### National Infrastructure Strategy

Published in November 2020, the Government acknowledges in its National Infrastructure Strategy that investment in our infrastructure is critical as the UK seeks to recover from the Covid-19 pandemic. The Strategy puts innovation and new technology at its heart, in which BT Street Hub is at the forefront of this technological revolution. The Government's ambition is to support fast and

reliable digital connectivity that can deliver economic, social and well-being benefits because new technologies have enormous potential to improve the environment and the daily lives of people across the UK. BT Street Hub can contribute to this with its suite of features, including Wi-Fi and small 5G cells capabilities, air monitoring and much more.

## **Town and Country Planning (Control of Advertisements) Regulations 1992**

This application is for full planning permission under Section 62 of the Town and Country Planning Act 1990 [the 1990 Act] and express advertisement consent under the Town and Country Planning (Control of Advertisements) (Wales) Regulations 1992 [the Regulations]. Applications for full planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise. Under the advertisement Regulations, Express Consent is required for the advertisement element, notably the 2no digital screens on each side of the Street Hub. Applications for Express Advertisement Consent must be determined in the interests of amenity and public safety, considering (a) the provisions of the development plan, so far as they are material, and (b) any other relevant factors.

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

### **PART I - General**

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

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

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

*(b) in the case of public safety—*

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

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

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

*(3) Unless it appears to the local planning authority to be required in the interests of amenity or public safety, an express consent for the display of advertisements shall not contain any limitation or restriction relating to the subject matter, content or design of what is to be displayed.*

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

## National Planning Guidance

Planning policy is provided at the national level by Planning Policy Wales 'PPW'. It is a material consideration in planning decisions.

Planning Policy Wales (PPW) sets out the land use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars, and policy clarification letters, which together with PPW provide the national planning policy framework for Wales.

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

### Planning Policy Wales (February 2024)

The Welsh Government's latest Planning Policy Framework – Planning Policy Wales 'PPW' was published in February 2024 (Edition 12) and the Government's approach is to continue to strongly support communications infrastructure. PPW remains very supportive of high-quality communications. Under Chapter 5 - Productive and Enterprising Places, section 5.2 Electronic Communications is dedicated to discussions on high-quality communications, emphasising the importance that the Government attaches to digital connectivity. Key paragraphs from this section, which are relevant to this application, have been highlighted below:

Paragraph 5.2.1 states that *"Affordable, secure electronic communications infrastructure is essential to people and businesses. The availability and exchange of information afforded by telecommunications ensures people are connected to important services, their communities and the wider world and is essential for long term prosperity. Fast reliable connections are essential to meet the needs of businesses and other organisations, and to those at home accessing digital services and working. Greater numbers of individuals working from home are a growing trend and planning authorities should consider the implications of this when preparing their development plans."*

Paragraph 5.2.5 states that *"The planning system should support telecommunications infrastructure where it is required, whilst taking in to account the status of protected land and buildings as well as amenity considerations to protect what is valued most in our communities and environment."*

PPW continues to support the expansion of electronic communications networks at paragraph 5.2.9. *"Development plans should set out policies for telecommunications development, including criteria-based policies to guide development to suitable locations. Criteria should be sufficiently flexible to accommodate technical changes and may be concerned with the siting and appearance of apparatus, including location and landscaping requirements designed to minimise the impact on amenity consistent with operational requirements."*

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

Paragraph 5.2.11 states that *"New technologies such as 5G will result in the densification of mobile infrastructure particularly in urban areas which could require more small cell sites in street settings. The planning system will need to respond positively to this evolution in technology whilst being mindful of the impacts on amenity and the historic environment."*

Paragraph 5.2.12 states that *“Local authorities should refer to the Code of Best Practice on Mobile Phone Network Development for Wales which provides further advice in relation to siting and design of infrastructure, in particular requirements relating to 5G technology.”*

Paragraph 5.2.18 states that *“Provided that the development meets the International Commission on Non-Ionising Radiation Protection (ICNIRP) guidelines, planning authorities should not consider the health aspects of mobile telecommunication equipment. All new base stations are expected to meet the ICNIRP guidelines.”*

PPW emphasises on good design to be key in making good places in Chapter 3: Strategic and Spatial Choices. The following paragraphs are found to be relevant to the proposal and are noted as under:

Paragraph 3.3 states that *“Good design is fundamental to creating sustainable places where people want to live, work and socialise.”*

Paragraph 3.4 states that *“Meeting the objectives of good design should be the aim of all those involved in the development process and applied to all development proposals, at all scales.”*

At paragraph 3.7, the PPG encourages decarbonisation and the use of renewable resources. This is relevant to the proposal since all Street Hubs are powered by **100% renewable carbon-free energy**, with energy efficiency prioritised throughout the design process.

*“Good design promotes environmental sustainability and contributes to the achievement of the well-being goals. Developments should seek to maximise energy efficiency and the efficient use of other resources (including land), maximise sustainable movement, minimise the use of non-renewable resources, encourage decarbonisation and prevent the generation of waste and pollution.”*

PPW supports the provision and promotion of safe and attractive streets in Chapter 4: Active and Social Places. The following paragraphs are found to be relevant to the proposal and are noted as under:

At paragraph 4.1.6, the PPG refers to improvement in digital connectivity to be one of the key aspects to be addressed by planning authorities in their development plan:

*“Planning authorities must set out in their development plan an integrated planning and transport strategy. This should set out how the planning authority will:*

- integrate and co-ordinate sustainable transport and land use planning;*
- facilitate and promote accessibility for all;*
- improve physical and digital connectivity;*
- reduce the need to travel;*
- reduce dependency on private vehicles;*
- prioritise and support walking, cycling and use of public transport;*
- support the uptake of Ultra Low Emission Vehicles;*
- reduce transport related airborne pollution; and*
- facilitate the provision of transport infrastructure and necessary sustainable transport.”*

At paragraph 4.1.19, the PPG refers to the need for well-designed and safe streets:

*“Well-designed, people orientated streets are fundamental to creating sustainable places and increasing walking, cycling and use of public transport. New development should improve the quality of place and create safe, social, attractive streets where people want to walk, cycle and enjoy, and children can play.”*

At paragraph 4.1.20, the PPG refers to the need for safe and attractive public realm:

*“The design and layout of streets must give a high priority to their role as public spaces and meeting the needs of pedestrians, cyclists and public transport users, reflecting the principles of the sustainable transport hierarchy. To create streets that are social places, the public realm needs to be safe and attractive[...].”*

PPW states the following specifically in relation to advertisement control in Chapter 6: Distinctive and Natural Places:

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

With the above discussions in mind, the Government is already forward-thinking with regards to the evolution of data networks and seeks planning decisions to take account of this.

## **FUTURE WALES The National Plan 2040**

Future Wales – the National Plan 2040 is a national development framework, setting the direction for development in Wales to 2040. It is a development plan with a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of communities.

Future Wales is a spatial strategy that identifies and connects key national and regional centres, provides a basis for long term infrastructure investment, identifies priorities for the planning system and a framework for the management of natural resources.

Future Wales’ spatial strategy is a guiding framework for where large scale change and nationally important developments will be focused over the next 20 years. The strategy blends the existing settlement patterns and the distribution of jobs and homes with a vision of managing change and future trends for the benefit of everyone in Wales.

In the context of proposed development, the following policies are found to be relevant and are noted as under:

### *“Policy 1 – Where Wales will grow*

*The Welsh Government supports sustainable growth in all parts of Wales. In three National Growth Areas there will be growth in employment and housing opportunities and investment in infrastructure. The National Growth Areas are:*

- *Cardiff, Newport and the Valleys*
- *Swansea Bay and Llanelli*
- *Wrexham and Deeside[...].”*

### *“Policy 2 – Shaping Urban Growth and Regeneration – Strategic Placemaking*

*The growth and regeneration of towns and cities should positively contribute towards building sustainable places that support active and healthy lives, with urban neighbourhoods that are compact and walkable, organised around mixed-use centres and public transport, and integrated with green infrastructure. Urban growth and regeneration should be based on the following strategic placemaking principles:*

- *creating a rich mix of uses;*
- *providing a variety of housing types and tenures;*
- *building places at a walkable scale, with homes, local facilities and public transport within walking distance of each other;*

- increasing population density, with development built at urban densities that can support public transport and local facilities;
  - establishing a permeable network of streets, with a hierarchy that informs the nature of development;
  - promoting a plot-based approach to development, which provides opportunities for the development of small plots, including for custom and self-builders; and
  - integrating green infrastructure, informed by the planning authority's Green Infrastructure Assessment.
- Planning authorities should use development plans to establish a vision for each town and city. This should be supported by a spatial framework that guides growth and regeneration, and establishes a structure within which towns and cities can grow, evolve, diversify and flourish over time."

#### *"Policy 13 – Supporting Digital Communications*

*The Welsh Government supports the provision of digital communications infrastructure and services across Wales.*

*Planning authorities must engage with digital infrastructure providers to identify the future needs of their area and set out policies in Strategic and Local Development Plans to help deliver this.*

*New developments should include the provision of Gigabit capable broadband infrastructure from the outset."*

### **Technical Advice Note (Wales) 7, Outdoor Advertisement Control (1996)**

TAN 7 should be read in conjunction with Planning Policy Wales. They are considered to be material to decisions on individual planning applications.

In paragraph 6, 'Criteria for Dealing with Advertisement Applications' has been discussed, which is noted:

*"The general approach to dealing with advertisement applications is similar to the process of dealing with planning applications but with two important differences. First, the display of outdoor advertisements can only be controlled in the interests of amenity and public safety. Second, it is accepted that (with one minor exception in Areas of Special Control, where an applicant needs to show a reasonable requirement for an advertisement) anyone proposing to display an advertisement needs that advertisement in that particular location, whether for commercial or other reasons."*

In paragraph 7, 'Consideration of Amenity' has been discussed, which is noted:

*"When it is appropriate to consider how brightly advertisements should be illuminated, local planning authorities should have regard to available guidance."*

In paragraph 10, 'Considerations of Public Safety' has been discussed, which is noted:

*"In assessing an advertisement's impact on public safety, local planning authorities should have regard to its effect upon the safe use and operation of any form of traffic or transport on land (including the safety of pedestrians), on or over water, and in the air, including the likely behaviour of vehicle drivers who will see the advertisement, possible confusion with any traffic sign or other signal, and possible interference with a navigation light or an aerial beacon. 11. When considering public safety factors, local planning authorities should consult other relevant organisations such as the highway authority who have an interest."*

In paragraph 12, 'Advertisement Control Policies' has been discussed, which is noted:

*"Development plan policies, controlling outdoor advertisements in areas or parts of areas where the display of poorly designed advertisements will be especially harmful, will be a material factor in considering an advertisement application. Development plans should give clear guidance to prospective advertisers on the likely acceptability of their proposals and provide a basis for rational and consistent decisions on advertisement applications. Even though advertisement control policies or design guidance may have been formulated having regard to matters of amenity and public safety, references to these policies and guidance cannot by themselves be the decisive factor in determining whether an advertisement is to be permitted. It will always be necessary*

*to assess the specific amenity and public safety merits of the proposed advertisement display in relation to the particular application site.”*

In paragraphs 16 and 17, ‘Advertisements in Conservation Areas’ has been discussed, which is noted: *“Where an area is designated as a conservation area ‘... Special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area’ in the exercise of any of the provisions of the Planning Acts. This includes the control of outdoor advertisements.”*

*“The designation of a conservation area does not, of itself, necessarily justify it being defined as an Area of Special Control of Advertisements. Many conservation areas are thriving commercial centres where the normal range of advertisements on commercial premises may be expected, provided they do not detract from visual amenity. Local planning authorities should use advertisement controls flexibly in such areas, so as to conserve or enhance particular features of architectural or historic interest.”*

### **Code of Best Practice on Mobile Phone Network Development for Wales**

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

The Code of Best Practice is intended to facilitate the smooth roll-out and upgrading of mobile telecommunications apparatus in Wales. The intent for this code of best practice is to:

- support the roll out of mobile phone infrastructure and to provide guidance with regards to the complex requirements associated with network deployment;
- set out an engagement framework for mobile network operators and planning authorities when considering applications for prior approval and/or full planning permission for the improvement of mobile networks;
- seek to avoid areas of conflict and to minimise any perceived adverse impacts with the provision of telecommunications equipment;
- and support a more collaborative approach to the deployment and improvement of digital connectivity throughout Wales.

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

The Code of Practice sets out the legal and policy framework for the delivery of wireless infrastructure development. The document also sets out the importance of connectivity. The following paragraphs from the ‘Introduction’ section are noted in this regard:

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

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

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

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

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

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

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

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

In the Section 'Siting and Design', the following paragraph is noted in context of proposed development:

*"Once an MNO has identified a requirement for a new installation, a suitable and available site must be identified. Elements that make a site favourable include: having existing or ready access to a power supply, access to fibre optic cables, an existing vehicular access, and, other buildings and development which may provide a level of existing screening. Planning authorities should therefore consider these issues and balance the need for a site within a limited search area with the greater public benefit of improved connectivity."*

In the Section 'Special Technical and Operational Considerations', the following paragraph is noted in context of proposed development:

*"All telecoms installations are principally guided by the technical need for the site and the technical constraints placed upon broadcasting a signal.*

*The siting and design of such installations must therefore be balanced between perceptions of visual impact and the proposed installations' technical needs and constraints."*

Compliance of any development to ICNIRP guidelines is noted from the section 'ICNIRP Compliance':

*"All mobile phone apparatus must comply with the requirements of the radio frequency (RF) public exposure guidelines of the International Commission on Non-Ionizing Radiation Protection (ICNIRP)."*

The following paragraph from the Section 'Network Deployment Considerations' reflects the importance given to digital connectivity so far as it is balanced with a visual impact of a minor nature:

*“In assessing proposals, planning authorities should have due regard to the special technical and operational considerations, and not seek to place or make unrealistic design demands. Planning authorities should give consideration to the balance between improved digital connectivity and the perceived visual impact of the development.”*

In the Section ‘Consultation and Application’ there is adequate weightage laid on the need to engage with local planning authorities early in the process:

*“When proposing telecommunications development, it is important for operators to engage positively with the local authority. Pre-application discussions are important in helping to identify the most appropriate solution for any individual development. The circumstances of each case and the level of consultation needed will usually differ depending on the location and type of development.*

*Throughout the consultation stage the operator may provide the following to the planning authority:*

- an explanation of their needs in a particular area;*
- details of the location and type of telecommunications apparatus or structure intended to be constructed;*
- details of any other mobile phone systems on the building or site;*
- the area of search and details of possible alternative options, where requested by the planning authority, which may include other methods of providing the required coverage and;*
- design options for particular sites.”*

There is a Section on ‘Pre-application Consultation with Local Residents’, ‘Consultation with Schools and Further Education (FE) Colleges’ and ‘Consultation with Other Interested Parties’. However, due to the minor scale of the proposal, we considered to submit the application without any consultation of this nature.

While discussing the submission of application, ‘Declaration of Conformity with ICNIRP Public Exposure Guidelines’ is considered to be a statutory requirement for all applications for planning permission in Wales. An ICNIRP certificate has been submitted along with this application.

The Code of Practice sets out further considerations in Annex A - Site Selection and Design:

- Site Selection should take into account aspects like use of existing buildings or structures, impact on protected areas and heritage assets, minimising visual impact, highways safety, site accessibility for build and maintenance;
- Design should take into account aspects like minimising visual impact, site sharing principles where applicable, etc.

In conclusion, the Government recognises the key role that the planning system plays in delivering the digital infrastructure that we need, in a sustainable and well-designed way, especially as households and businesses become increasingly reliant on mobile connectivity. The added emphasis on support from Local Planning Authorities in the deployment of digital infrastructure is quite evident in the Code of Practice. The Code of Practice recognises the importance of collaboration and partnership to help drive network coverage across the country.

The above discussion should be taken into consideration in the assessment of the proposal.

## **Local Planning Policy**

The Newport Local Development Plan 2011 – 2026 was adopted in January 2015. The vision of the plan is:

*‘As a gateway to Wales, Newport will be a centre of regeneration that celebrates its culture and heritage, while being a focus for varied economic growth that will strengthen its contribution to the region. It will be a place that people recognise as a lively, dynamic, growing City, with communities living in harmony in a unique natural environment.’*

As part of the plan, a sustainable development strategy is proposed, with a focus on regeneration, building on the culture and heritage of the City, seeking to maximise the use of previously developed, brownfield land. The Plan also reflects a strong commitment of the Welsh Government towards low and zero carbon development.

It is considered that the following policies are applicable to the proposed development, and in accordance with this case:

- Policy SPI Sustainability
- Policy GPI General Development Principles – Climate Change
- Policy GP2 General Development Principles – General Amenity
- Policy GP4 General Development Principles – Highways and Accessibility
- Policy GP6 General Development Principles – Quality of Design
- Policy GP7 General Development Principles – Environmental Protection and Public Health
- Policy CE7 Conservation Areas

### **Policy SPI Sustainability**

*“Proposals will be required to make a positive contribution to sustainable development by concentrating development in sustainable locations on brownfield land within the settlement boundary. They will be assessed as to their potential contribution to:*

- i) *the efficient use of land;*
- ii) *the reuse of previously developed land and empty properties in preference to greenfield sites;*
- iii) *providing integrated transportation systems, as well as encouraging the co-location of housing and other uses, including employment, which together will minimise the overall need to travel, reduce car usage modes of transport;*
- iv) *reducing energy consumption, increasing energy efficiency and the use of low and zero carbon energy sources;*
- v) *the minimisation, re-use and recycling of waste;*
- vi) *minimising the risk of and from flood risk, sea level rise and the impact of climate change;*
- vii) *improving facilities, services and overall social and environmental equality of existing and future communities;*
- viii) *encouraging economic diversification and in particular improving the vitality and viability of the city centre and district centres;*
- ix) *conserving, enhancing and linking green infrastructure, protecting and enhancing the built and natural environment;*
- x) *conserving and ensuring the efficient use of resources such as water and minerals.”*

### **Policy GPI General Development Principles – Climate Change**

**“DEVELOPMENT PROPOSALS SHOULD:**

*[...] ii) be designed to minimise energy requirements and incorporate appropriate renewable, low or zero carbon energy sources, including on site energy provision where practicable;”*

### **Policy GP2 General Development Principles – General Amenity**

*“Development will be permitted where, as applicable:*

- i) there will not be a significant adverse effect on local amenity, including in terms of noise, disturbance, privacy, overbearing, light, odours and air quality;
- ii) the proposed use and form of development will not be detrimental to the visual amenities of nearby occupiers or the character or appearance of the surrounding area;
- iii) the proposal seeks to design out the opportunity for crime and anti-social behaviour;
- iv) the proposal promotes inclusive design both for the built development and access within and around the development;
- v) adequate amenity for future occupiers.”

#### **Policy GP4 General Development Principles – Highways and Accessibility**

“Development proposals should:

- i) provide appropriate access for pedestrians, cyclists and public transport in accordance with national guidance;
- ii) be accessible by a choice of means of transport;
- iii) be designed to avoid or reduce transport severance, noise and air pollution;
- iv) make adequate provision for car parking and cycle storage;
- v) provide suitable and safe access arrangements;
- vi) design and build new roads within private development in accordance with the highway authority’s design guide and relevant national guidance;
- vii) ensure that development would not be detrimental to highway or pedestrian safety or result in traffic generation exceeding the capacity of the highway network.”

#### **Policy GP6 General Development Principles – Quality of Design**

“Good quality design will be sought in all forms of development. The aim is to create a safe, accessible, attractive and convenient environment. In considering development proposals the following fundamental design principles should be addressed:

- i) **Context of the site:** All development should be sensitive to the unique qualities of the site and respond positively to the character of the area;
- ii) **Access, permeability and layout:** All development should maintain a high level of pedestrian access, connectivity and laid out so as to minimise noise pollution;
- iii) **Preservation and enhancement:** Where possible development should reflect the character of the locality but avoid the inappropriate replication of neighbouring architectural styles. The designer is encouraged to display creativity and innovation in design;
- iv) **Scale and form of development:** New development should appropriately reflect the scale of adjacent townscape. Care should be taken to avoid over-scaled development;
- v) **Materials and detailing:** High quality, durable and preferably renewable materials should be used to complement the site context. Detailing should be incorporated as an integral part of the design at an early stage;
- vi) **Sustainability:** New development should be inherently robust, energy and water efficient, flood resilient and adaptable, thereby facilitating the flexible re use of the building. Where existing buildings are present, imaginative and sensitive solutions should be sought to achieve the re-use of the buildings.”

In this section, at paragraph 3.4.3, there is a reference to developments relating to advertisements as below:

“In considering applications for signs and advertisements, regard will be had to guidance set out in TAN 7: Outdoor Advertisement Control (1996) and TAN 12: Design (2014). Within Conservation Areas and residential areas illuminated box signs, projecting signs and advertisement hoardings will not be permitted unless they can be successfully related to the design and detail of the building and do not detract from the special character of a group of buildings or a street.”

## **Policy GP7 General Development Principles – Environmental Protection and Public Health**

*“Development will not be permitted which would cause or result in unacceptable harm to health because of land contamination, dust, instability or subsidence, air, heat, noise or light pollution, flooding, water pollution, or any other identified risk to environment, local amenity or public health and safety.”*

## **Policy CE7 Conservation Areas**

*“Development within or adjacent to conservation areas will be required to:*

- i) be designed to preserve or enhance the character or appearance of the conservation area, having regard to the conservation area appraisal where appropriate.*
- ii) avoid the removal of existing historic features, including traditional shopfronts and joinery.*
- iii) use materials which are traditional, or appropriate to their context.*
- iv) complement or reflect the architectural qualities of nearby buildings which make a positive contribution to the character of the area.*
- v) pay special attention to the settings of buildings, and avoid the loss of any existing domestic gardens and open spaces which contribute to the character of the area.*
- vi) avoid adverse impact on any significant views, within, towards and outwards from the conservation area.”*

## **Shopfront Design Supplementary Planning Guidance (SPD)**

The SPG was formally adopted by Newport City Council on 15 October 2021. This SPG is relevant in the determination of this application due to some sections of it providing advice on advertisement applications.

At paragraph 2.6, the SPD advises that, *“TAN 7: Outdoor Advertisement notes the important economic implications of advertising should be recognised but that designers should be prepared to compromise on matters of corporate design where it is unsuitable in a particular area. Designing and siting signs to harmonise with their setting a key factor in this design guide.”*

At paragraphs 3.5 and 3.6, the SPD advises for advertisement applications that, *“The Council recognises that advertising is essential to successful commercial activity.”*

*“The Council has a statutory duty to protect and enhance the special interest of the Conservation Area. This does mean that some types of advertisement that usually has ‘deemed consent’ requires approval from the Local Planning Authority.”*

At paragraph 9.8, the SPD advises on lighting and illumination levels for advertisements. Though these are more specific to shopfronts, these may as well guide freestanding advertisements:

*“9.8.1 Lighting should be considered as part of the overall design rather than a later addition. Subtle lighting can add vitality to the night-time street scene but poorly designed illuminated signs are unattractive.”*

*“9.8.5 Over-illumination must be avoided. Inconsistent illumination of shops will spill into the public realm and increase the level of light on the streets at night in addition to street lights. Areas of bright light allows for dark areas, in particular pedestrian routes and small lanes, having the potential to attract crime.”*

*“9.8.7 Intermittent, flashing and moving displays are also not permitted as they can have a negative effect on streetscape.”*

## **Pre-application advice**

Due to the minor scale of the proposed development and in an effort to move the project forward as efficiently as possible, we have not undertaken any pre-application consultation in this instance. However, BT are keen to ensure that communication channels remain open over the course of the application to address any unforeseen issues.

## Planning History

There is a considerable history of Street Hub units found on the local planning authority's website from 2022. It has been observed that out of 29 applications, 6 applications were approved with conditions, while the others were refused.

The following application for the display of advertisements in the vicinity of the application site is noted as below:

- Address: Monmouthshire House, 13 John Frost Square, Newport, NP20 1PX

Proposal: Display of 2no. externally illuminated fascia signs and 2no. internally illuminated hanging signs / application reference: 18/0658 / approved: 27<sup>th</sup> September 2018

Reasoning: Extract from the planning report: “

*“The proposed advertisements would not result in a detrimental impact to the character or appearance of the area or public safety and are therefore acceptable.”*

## Direct conversion

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

The location already has many items of street furniture prevalent including streetlights, bollards and trees. Taking these matters into account while allowing BT to meet its deployment requirements as part of this project, the proposed Street Hub unit has been proposed on a wide stretch of pavement within this area of Newport Town Centre.

### Photograph of the Existing Telephone Kiosk to be Replaced



## **Siting Justification against Planning Policy**

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

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

Likewise, as Street Hubs can provide the Council with valuable data as each unit has environmental sensors that can monitor air, sound and light, we have tried to plan a sequence of Street Hub sites along key routes, so that the information gathered can be better analysed. This free environmental data has its own dashboard and will help the planning system actively manage patterns of growth in support of national air quality objectives and will be a useful source of real-time data in the delivery of the Council's own green agenda. In a similar vein, Street Hubs have the capability to monitor pedestrian, cyclist, and vehicle movements, hence in building a strategic network of Street Hub units, this will help the Council monitor and develop travel plans for the area.

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

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

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

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

### **Siting**

This proposal involves the removal of 1no. BT existing call box in association with the installation of 1no. proposed new Street Hub unit. The removal of the existing call box will declutter the street scene outside Monmouthshire House, and when comparing the footprint of the existing kiosk to be removed with that of the proposed Street Hub, the footpath will be decluttered while freeing up space.

The application site comprises a section of pavement adjacent to Monmouthshire House, fronting onto John Frost Square within the Kingsway Centre area of Newport city centre. It forms part of a pedestrianised public realm associated with the Friars Walk redevelopment, characterised by high footfall, active commercial frontages, and a modern urban environment. The site occupies a highly accessible and sustainable location within the primary retail and leisure core, approximately 20 metres east of the Newport Town Centre Conservation Area.

The proposal relates to the use of this space for a town centre-appropriate function and is considered to align with national policy set by the Welsh Government and local policy under Newport City Council, which support development that enhances the vitality and viability of city centres. The development will be compatible with the surrounding commercial context, maintain safe pedestrian movement, and shall have no adverse impact on nearby heritage assets. As such, it is considered acceptable in planning terms and consistent with the objectives of sustainable urban development.

It is considered that a Street Hub unit at this location will not look out of character, given the presence of commercial and business land-uses within the town centre. Given the wide nature of the pavement, there will be no impact on the movement of pedestrians and wheelchair users.

### **Appearance**

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

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

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

The installation will sit within a commercial setting and busy pedestrianised street that is dominated by pedestrian movements; hence it is well-lit throughout the day. While it is accepted that the BT Street Hub advertisements will be more visible during the hours of darkness or in dull conditions, its appearance shall not be out of keeping with this stretch of road which is well lit by streetlights, signage and window displays. The proposed Street Hub unit will be placed on a wide stretch of pavement, where it will benefit from context provided by the adjacent, modern buildings including Monmouthshire House and Kingsway Centre with their array of extensive frontages. In this context, we do not consider the BT Street Hub design will appear detrimental to the amenity of John Frost Square.

It is concluded that the design of the proposed Street Hub is justified, and its appearance is an improvement when compared to the ageing and outdated call box which is to be replaced. Overall, we consider the appearance of the proposed Street Hub is acceptable and in accordance with national and local planning policies.

### **Pavement Width**

The existing pavement width at this location is just over 10.5 metres wide (between Monmouthshire House and the adjacent building which comprises 38-39 Llanarth Street). The total width of the Street Hub is 1.236m. The Street Hub will occupy part of the site which is presently accommodating the telephone kiosk and will sit over 2.1 metres from Monmouthshire House and 4.8 metres from 38-39 Llanarth Street. The position of the site will ensure the footway remains clear for the safe passing of pedestrians, cyclists, wheelchair users and pram-users. This is in line with the national standards set for desirable pavement widths in Wales.

### **Advertisements**

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

In terms of public safety, the site of the BT Street Hub and the display of digital advertisements on its sides will allow for the continued safe movements of 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. Please note, the site is positioned within a pedestrianised street and there will be no impact to vehicular traffic.

Regarding pedestrian safety, the Street Hub is positioned on a wide section of pavement without impeding pedestrian movements as ample footway width shall be retained.

The area surrounding this specific site is visually busy due to proximity of the many shops, including the Kingsway Shopping Centre. The proposal will be an addition to the ground elevation and in context with the surrounding street furniture.

The proposed usage for the screens has been set in accordance with Schedule 1 of The Town and Country Planning (Control of Advertisements) (Wales) Regulations 1992:

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

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

5. be removed carefully where so required by the planning authority.

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

In addition to the above conditions, each Street Hub location has been assessed against and would comply with the following additional criteria from the TfL Guidance.

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

The lighting levels noted above are within the levels set for this type and size of screen (those under 10m<sup>2</sup>) as set by the Institute of Lighting Professionals, Professional Lighting Guide 05: The Brightness of Illuminated Advertisements (2023). A copy of this document is appended for clarity.

## Noise Management

As one of many features, Street Hubs provide free phone calls via a speaker and microphone system. The following document identifies the steps we are able to take to ensure that these calls, like all the features of the Street Hub, help improve the amenity of a local area whilst also respecting the expectations of local community over time. Please note: this noise management plan refers specifically to the noise from the Street Hub. Noise from pedestrians, users of the Street Hub, or from other nearby sources are not included and would typically be considered matters for the Police and other authorities who have the appropriate and relevant powers to act on such issues if necessary.

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

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

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



### **Daytime (07:00 – 21:00)**

Street Hub have controllable volume levels. This will default to 50% at the start of any user activity during the day and can be increased and decreased based on the preferences of the user.

### **Night Time (21:00 – 07:00)**

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

### **Exceptional Circumstances**

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

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

### **Further information**

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

### **Heritage Statement**

It is important to note that the application site is located just outside the Newport Town Centre Conservation Area (approximately 20 metres east of the Conservation Area), which seeks to preserve and enhance the architectural, historic and cultural significance of this part of the town. The proposal is also situated approximately 35 metres north-east of 42 Commercial Street, a Grade II listed building (record number: 23109).

The surrounding area forms a key retail frontage within the town centre and experiences a high level of pedestrian activity. In this context, the scale of surrounding buildings—typically two to five storeys—means that the proposed Street Hub, at 2.98 metres in height, will appear modest. It will be lower than much of the existing street furniture and, when viewed within the wider street scene, will assimilate with the established character, which is defined by active shopfronts and a variety of urban fixtures.

It is acknowledged that careful consideration must be given to balancing the potential for visual impact on designated heritage assets against the public benefits arising from new development. In this instance, when viewed in context, the siting and orientation of the proposed BT Street Hub shall not

appear incongruous, nor will it result in any significant adverse effect on the character or appearance of the conservation area, or the setting of the nearby listed building.

Any harm identified will be, at most, less than substantial and should be weighed against the clear public benefits of the proposal. These include enhanced digital connectivity in a busy and commercially active part of the town centre. Furthermore, the proposal will facilitate the removal of an outdated and visually prominent telephone kiosk, resulting in a net improvement to the quality and appearance of the streetscape.

Overall, the development is considered to preserve the character and appearance of the conservation area and listed building, while delivering meaningful public benefits.

## **Conclusion**

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

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

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

## **Planning Conditions**

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

- a. Within three (3) months of development commencing the existing BT payphone (to be replaced), shall be removed in its 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/m<sup>2</sup>) between dusk and dawn in line with the maximum permitted recommended luminance as set out by 'The Institute of Lighting Professional's 'Professional Lighting Guide 05: The Brightness of Illuminated Advertisements'.
- d. The digital display screens shall not display any moving, or apparently moving, images (including animation, flashing, scrolling three dimensional, intermittent or video elements).
- e. The minimum display time for each piece of content on the digital display screens shall be 10 seconds.

- f. The interval between each piece of content on the digital display screens shall take place over a period no greater than one second; the complete screen shall change with no visual effects (including swiping or other animated transition methods) between displays and the display will include a mechanism to freeze the image in the event of a malfunction.
- g. No content on the digital display screens shall resemble traffic signs, as defined in section 64 of the Road Traffic Regulation Act 1984.

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