



Applicant or Agent Details

☐ Applicant ☒ Agent

Agent Details

Telent

Martin

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☒ Organisation/Corporate entity

Applicant Details

Please enter Applicant details

Title:		You must enter a Building Name or Number, or both: *	
Other Title:		Building Name:	1
First Name: *		Building Number:	
Last Name: *		Address 1 (Street): *	Braham Street
Company/Organisation	BT Group PLC	Address 2:	
Telephone Number: *		Town/City: *	London
Extension Number:		Country: *	UK
Mobile Number:		Postcode: *	E1 8EE
Fax Number:			
Email Address: *	REDACTED		

Site Address Details

Planning Authority:	Glasgow City Council
Full postal address of the site (including postcode where available):	
Address 1:	
Address 2:	
Address 3:	
Address 4:	
Address 5:	
Town/City/Settlement:	
Post Code:	

Please identify/describe the location of the site or sites

Footpath opposite 794 Govan Road, Glasgow, G51 2YL

Northing	665697	Easting	255465
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Appeal Statement

**Installation of New BT Street Hub and Associated Display of
Advertisement Panels to Both Sides of the Unit.**

GLG-04

**Footpath opposite 794 Govan Road, Glasgow, G51 2YL
(E: 255465, N: 665697)**

Glasgow City Council

26/00411/FUL & 26/00410/ADV



**Submitted on behalf of
BT Group PLC**

by

**Telent Technology Services Ltd
Rutland House
5 Allen Road
Livingston
EH54 6TQ**

June 2026

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1.0 Introduction

- 1.1 This submission is a view of the planning matters relating to the proposal based on the information provided by third parties. All technical and background information, which forms part of this submission, is assumed to be factually correct and accurate.
- 1.2 Telent has been instructed by BT Group Plc to appeal Glasgow City Council's decision to refuse planning permission (LPA Ref: 26/00411/FUL) and express advertisement consent (LPA Ref: 26/00410/ADV) for the *Installation of 1No. BT Street Hub Unit and associated advertisement panels on either side of the unit* at Footpath opposite 794 Govan Road, Glasgow, G51 2YL (E: 255465, N: 665697).
- 1.3 On a procedural matter, this appeal will specifically focus on the full planning aspect of the development which will be submitted to the Planning Local Review Committee of the Council. A separate appeal will be submitted to the Scottish Ministers for the advertisement consent application (albeit against the same reasons for refusal).
- 1.4 The full planning application, refused by the council on the 1st May 2026, was refused for the following reasons:
1. *The proposal was not considered to be in accordance with the Development Plan and there were no material considerations which outweighed the proposal's variance with the Development Plan.*
 2. *By reason of its siting and design, the proposed development would be a conspicuous and incongruous feature in the local townscape and would have a detrimental impact on visual amenity and character of the conservation area. It would, therefore, not be in accordance with the National Planning Framework 4 Policies 9 and 14 and the Planning Authority's guidance through the City Development Plan on visual amenity in relation to Advertising: SG1 (Part 2) (Signs and Advertising).*
 3. *That by way of its siting and scale, the development has the potential to create an obstruction to pedestrians. As a result the development would not be considered to be acceptable in terms of public safety and as such is not in accordance with the National Planning Framework 4 Policy 23 and the Planning Authority's guidance through the City Development Plan on public safety in relation to Advertising: SG1 (Part 2) (Signs and Advertising).*

The below images show an aerial view and street view of the appeal site respectively.



Figure 1 – *Satellite view of the appeal site*



Figure 2 – *Streetscene of the appeal site.*

The appellant's case comprising a number of interrelated sections which will:

- describe the appeal site and surroundings in respect of visual character of the area (Section 2),
- provide a background to the street Hub project for the appeal proposal and general statement in respect of health and safety issues (Section 3),
- describe the regulatory framework and planning policy framework, in relation to the proposal, in terms of both the national and local policy (Section 4),
- focus on the grounds of appeal and the Council's reason for refusal (Section 5),
- further discussion of the public benefits of the scheme (Section 6),
- submit our conclusion (Section 7).

- 1.4 Reference will be made to the background papers that comprise the application and further information attached as appendices to this statement (if applicable), and it may expand on the documentation to support an opinion.
- 1.5 A separate appeal will be made to the accompanying application refused by the Council at this appeal site.

2.0 Application Proposals and Appeal Site Description

Application Proposals

- 2.1 The relevant application proposals was for the installation of a new BT Street Hub with associated LED digital display of advertisement on either side of the unit at the location outlined below. In 2017, BT started working as part of an exclusive partnership with InLinkUK to ensure communities in urban areas throughout the United Kingdom are well-served in the digital age through the roll out of 'InLink' units. These were developed and deployed to replace and rationalize the existing network of payphones.
- 2.2 Through collaboration with councils, BT helped in creating a service that revolutionized streetscapes and helped in providing a connected city solution that delivers the fastest and most robust free public Wi-Fi service in the UK. Councils across the UK have used the InLink units to meet key challenges head-on, upgrading local infrastructure, tackling the digital divide, and freeing the street(s) from unnecessary furniture.
- 2.3 Unfortunately, InLinkUK (who were supplying the units to BT within the partnership) went into administration in 2019, and, as such, the InLink product is no longer available. Since then, BT have been working on a new and improved unit - the 'Street Hub'. The Street Hub has all the existing benefits of the previous InLink unit, but has improved Wi-Fi range, environmental sensors, insight counting and small cell mobile connectivity. This addition of the 5G small cells to Street Hubs is very much in line with current UK Government's guidance on communications infrastructure and the National Infrastructure Strategy. Consequently, when installed, residents, local businesses and visitors will get a faster, more reliable connection for calls and internet access.
- 2.4 Additionally, these new units will be monitored 24/7, with weekly inspections and a minimum of bi-weekly cleaning services to keep the unit to a high standard of finish within the existing streetscape. All units will be fitted with a direct 999 call button to aid in the efficiency of operations of the emergency services, with emergency (i.e. Police) awareness messaging shown via their advertising screens on either side of the unit. Furthermore, Street Hubs are powered by 100% renewable carbon-free energy, making them sustainable and durable for years to come.
- 2.5 Whilst the main function of the Street Hub is to provide free electronic communications services, the funding of such services, whilst not being at the expense of the public purse, requires commercial viability and this is

provided by the advertising revenue from the integrated LED digital screens, one located either side of the Street Hub unit. Separate applications for full planning for the proposed Street Hub unit as well as for express advertisement consent were submitted to the Council and duly refused. The accompanying application refused forms the subject of a separate appeal under the relevant consenting regime, as outlined in the foregoing section.

- 2.6 The location of the appeal site is shown in the drawings forming part of this appeal and as submitted to the Council (see Figures 1 & 2 of this statement).



Figure 3 – *Evolution of BT telephone kiosk estate.*

Appeal Site Description

- 2.7 The appeal site comprises section of footpath opposite, 794 Govan Road, Glasgow. This proposal seeks approval to upgrade and slightly relocated the 1No. BT phone booth that exists to the south-west of the site to an upgraded singular Street Hub unit.
- 2.8 The site is located on a wide portion of pedestrian footpath to the south-west of the Govan Road which is a two-lane carriageway. The site is located outside an area public open space outside the Govan underground station. This portion of the footpath is currently occupied by existing street furniture including a public bin and bus shelter of which the proposed kiosk will maintain alignment with, kerbside on the footway. To the north-west the footpath continues to the reach the Govan Shopping Centre building. To the north-east, on the opposite side of Govan Road, are commercial tenancies.

The site is not located in proximity to vehicle junctions or pedestrian crossing points.

- 2.9 The surrounding area is categorised as a commercial area with uses including retail, a shopping centre and modern Govan Station, which is a modern station that completed redevelopment in 2016. The advertising theme includes fascia advertisements associated with adjoining commercial tenancies and double-sided advertisements associated with nearby bus shelters. The site is within Govan Conservation Area and nearby 784-796 (Even Nos) Govan Road, New Govan, Formerly St Mary'S, Church Hall and Shops Below (Grade B) listed building.
- 2.10 The proposal includes the removal of 2No. existing BT kiosk (1No. as mentioned on the footpath opposite, 788 Govan Rd, Glasgow and 1No. on the footpath adjacent 629 Great Western Rd, Glasgow). The removal of these phone boxes will assist in the decluttering of footpaths in the Council and enhance the broader area's visual amenity. Details of the kiosks proposed to be removed is provided in the table below.

Proposed Kiosk Removal	
Tel. 01414451103	Tel. 01413373180
Footpath opposite, 788 Govan Rd, Glasgow G51 3YL	Footpath adjacent, 629 Great Western Rd, Glasgow G12 8RE
	

Figure 4 – Photo of the existing BT kiosk set to be removed.

- 2.11 Whilst there is no relevant history relating to the proposed site, it is important to note that BT Group Plc lodged applications for Street Hub units in the City of Glasgow in 2021, of which 16No. of applications were approved. Some of these Street Hubs have since been deployed and are now well integrated within many street scenes within the LPA.

3.0 Background to the Street Hub Project in the Council Area: Need for the Site

- 3.1 This application is part of a wider scheme of BT Street Hub implementation throughout the U.K. In terms of roll-out, where possible and practicable, it is proposed to install Street Hubs either as a direct replacement for existing BT payphones, or in very close proximity to such payphones. As these existing payphones will be removed it should minimise impact on existing streetscenes by reducing street clutter, or at least not adding to it at particular locations. In this instance, the proposal would not see the removal of existing phone kiosks, however a number of kiosks are set to be removed elsewhere as part of a strategic package of applications submitted to the Council, containing a number of Street Hubs located within existing streetscapes in the Council area.
- 3.2 A Planning, Design and Access Supporting Statement was submitted as part of the full planning and express advertisement consent applications which provides technical details of the Street Hubs, a justification for the proposal's in terms of its siting and appearance and the added benefits it will bring to the public realm areas of this part of the Council area in terms of the modern services it provides to the public, visitors and business alike.
- 3.3 It is contended by the Appellant that in their determination of the applications, the LPA overestimated their consideration in respect of visual amenity concerns, particularly when considering the existing street scene and similar forms of development nearby meaning it would not be, as considered in the decision notice for full planning, visually incongruous. The need for modern and reliable telecommunications networks not something that the council should query as the NPF4 is clear in its view that Local planning authorities should not 'question the need' for such infrastructure.
- 3.4 The Appellant considers that in terms of the Council's assessment against its development plan policies they did not give sufficient consideration to the benefits of the electronic communications infrastructure in the planning balance against any perceived visual harm to the locale. Or indeed consideration in terms of the proposal seeing replacement of a piece of infrastructure that form part of the appellants existing estate and which has been a long-established piece of the street scene.
- 3.5 It is considered that modern cities and its inhabitants and visitors expect high level mobile communications network technology, whether this be Wi-Fi, or mobile services networks. The fact that free W-Fi network is to be provided in the Council area via the Street Hub has not been given due

weight by the Council in their determination of the Street Hub's visual impacts is contended. This Wi-Fi communications network would be free to the user and would not cost the Council to install or maintain. The main benefits as a result of the street hubs could be summarised as follows;

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

3.6 These benefits in addition to those provided by a traditional BT payphone should be given significant weight in the planning balance as required by the development plan and policy guidance in NPF4 against the consideration of any visual harm that may be predicted due to the alleged prominence of the Street Hub. For clarity, the existing kiosks to be removed forms part of the appellants estate and are still in use and will remain this way if the appeal proposal cannot be progressed.

3.7 As discussed, in some instances the proposal will not see the replacement or 'relocation' of nearby infrastructure, and will see the installation of a new unit, and in such instances additional kiosks will be removed from elsewhere within the council area (as identified by the appellant), and when considering their Ofcom requirements to provide public infrastructure. The proposed Street Hub's will help to deliver a comprehensive network of connectivity within the borough whilst enhancing the functionality of the Council's streetscene and use.

4. Planning Policy Framework

- 4.1 In accordance with the planning act the consideration in terms of the appeal proposal's determination regard should be had of the development plan and it determined accordingly unless material considerations indicated otherwise.

Town and Country Planning (Control of Advertisements) (Scotland) Regulations 1984

The Town and Country Planning (Control of Advertisements) (Scotland) Regulations 1984 set out the Government's advertisement control planning policies for Scotland and how these are expected to be applied and is considered to be a material consideration for the Express Advertisement Consent application. The Town and Country Planning (Control of Advertisements) (Scotland) Regulations 1984 state the following specifically in relation to advertisement control:

PART II - General Provisions

Control of advertisements to be exercised in the interests of amenity and public safety.

4. – (1) The powers conferred by these regulations with respect to the grant or refusal of consent for the display of advertisements, the revocation or modification of such consent, and the discontinuance of the display advertisements with consent deemed to be granted, shall be exercisable only in the interests of amenity and public safety.

(2) When exercising such powers, a planning authority-

- (a) shall, in the interests of amenity, determine the suitability of the use of a site for the display of advertisements in the light of the general characteristics of the locality, including the presence of any feature of historic, architectural, cultural or similar interest; and when assessing the general characteristics of the locality the authority may disregard any advertisements being displayed therein;
- (b) shall, in the interests of public safety, have regard to the safety of persons who may use any road, railway, waterway (including coastal waters), dock, harbour, or airfield affected or likely to be affected by any display of advertisements; and shall in particular consider whether any such display is likely to obscure, or hinder the ready

interpretation of any road traffic sign, railway signal, or aid to navigation by water or air;

But without prejudice to their power to have regard to any other material factor.

Scottish Planning Policy 2014 (SPP)

Scottish Planning Policy published in June 2014, is a statement of Scottish Government policy on how national important land use planning matters should be addressed across the country. This SPP was updated, and a revised document published in December 2020. SPP is supplemented by a series of Planning Advice Notes (PANs).

Paragraph 2 states that planning should take a positive approach to enabling high-quality development and making efficient use of land to deliver long-term benefits for the public while protecting and enhancing natural and cultural resources.

Paragraphs 22 and 23 under Outcome 4 '*A more connected place – supporting better transport and digital connectivity*', sets the stance for digital connectivity, stating that improved digital connections will play a key role in helping to deliver the spatial strategy for sustainable growth. By aligning development more closely with digital infrastructure, planning can improve sustainability and connectivity. Improved connections facilitate accessibility within and between places – within Scotland and beyond – and support economic growth and an inclusive society.

The presumption in favour of sustainable development, as set out within the SPP, states that the planning system should support economically, environmentally and socially sustainable term. The aim is to achieve the right development in the right place; it is not to allow development at any cost. Planning policies and decisions should support sustainable development. For the purposes of this policy, to assess whether a policy or proposal supports sustainable development, the following principles, of direct relevant to the proposal, should be taken into account:

- giving due weight to net economic benefits;
- responding to economic issues, challenges and opportunities, as outlined in local economic strategies;
- supporting good design and the six qualities of successful places;

Making efficient use of existing capacities of land, buildings and infrastructure including supporting town centre and regeneration priorities;

- supporting delivery of infrastructure, for example transport, education, energy, digital and water;
- improving health and well-being by offering opportunities for social interaction and physical activity, including sport and recreation;
- having regard to the principles for sustainable land use set out in the Land Use Strategy;
- protecting, enhancing and promoting access to natural heritage, including green infrastructure, landscape and the wider environment;

Paragraphs 292 – 300 of the SPP relates specifically to Supporting Digital Connectivity. It highlights the importance of our telecommunications and digital infrastructures across the whole of Scotland, including urban and rural areas and confirms that Scotland's economy and social networks depend heavily on having high-quality digital infrastructure. To facilitate investment across Scotland, planning has an important role to play in strengthening digital communications capacity and coverage across Scotland.

Of direct relevance to the proposal, Paragraph 293 *Policy Principle* states that the planning system should support:

- development which helps deliver the Scottish Government's commitment to world-class digital connectivity;
- the need for networks to evolve and respond to technology improvements and new services; and
- infrastructure provision which is sited and designed to keep environmental impacts to a minimum.

In addition to the above, paragraph 294 goes on to state that Local Development Plans should reflect, amongst others, the infrastructure roll-out plans of digital communications operators.

Paragraph 296 confirms that Local development plans should set out the matters to be addressed in planning applications for specific developments, including:

- an explanation of how the proposed equipment fits into the wider network;
- a description of the siting options (primarily for new sites) and design options which satisfy operational requirements, alternatives considered, and the reasons for the chosen solution;

- details of the design, including height, materials and all components of the proposal;
- details of any proposed landscaping and screen planting, where appropriate;
- an assessment of the cumulative effects of the proposed development in combination with existing equipment in the area;
- a declaration that the equipment and installation is designed to be in full compliance with the appropriate ICNIRP guidelines for public exposure to radiofrequency radiation; and
- an assessment of visual impact, if relevant.

It is considered that the proposal has address all relevant matters set out in the 'model' telecommunications policy relevant to the proposal in this instance.

In assessing applications for telecommunications/digital infrastructure development, paragraph 298 of the SPP confirms that *“Consideration should be given to how proposals for infrastructure to deliver new services or infrastructure to improve existing services will contribute to fulfilling the objectives for digital connectivity set out in the Scottish Government’s World Class 2020 document. For developments that will deliver entirely new connectivity – for example, mobile connectivity in a “not spot” – consideration should be given to the benefits of this connectivity for communities and the local economy”*.

Paragraph 299 then states that. *“All components of equipment should be considered together and designed and positioned as sensitively as possible, though technical requirements and constraints may limit the possibilities..... The cumulative visual effects of equipment should be taken into account”*.

Paragraph 300. States that *“Planning authorities should not question the need for the service to be provided nor seek to prevent competition between operators. The planning system should not be used to secure objectives that are more properly achieved under other legislation. Emissions of radiofrequency radiation are controlled and regulated under other legislation, and it is therefore not necessary for planning authorities to treat radiofrequency radiation as a material consideration”*.

Designing Streets and Designing Places: A Policy Statement for Scotland

Designing Places and Designing Streets stand together as the two key design policy statements for Scotland and can be a material planning

consideration. Within the Designing Places document, there are six qualities of successful places:

- Distinctive
- Safe & pleasant
- Easy to move around
- Welcoming
- Adaptable
- Resource efficient

The BT Street hubs are designed to improve and enhance the areas they are placed within. As this application involves the installation of a modern and clean designed unit, the street design and sense of place will be enhanced. As the BT Street Hubs are more suited to the current societal needs of urban areas with multi-faceted benefits such as advertising, air quality monitoring and tourist info, the six qualities of successful places can be met.

Development Plan Policies

In determining applications for planning permission, the authority should have regard to the provisions of the development plan, so far as they are material to the application, and to any other material considerations (Section 37(2) of the 1997 Act. In this regard, the current Development Plan for the Glasgow Council is currently the Glasgow City Development Plan (2017).

Glasgow City Development Plan

The Glasgow City Development Plan ('Development Plan') was adopted in March 2017 and replaced the previous City Plan 2 (2009). The Development Plan puts forward positive measures that will keep Glasgow at the heart of Scotland's future and allow it to make the most of its resources for the benefit of residents, businesses, employees and visitors. In this regard, one of the four strategic outcomes set out to achieve these key aims is to make the city '*A Connected Place*.' The aim is to achieve a city that is a place where it is easy to move around with active travel and public transport given priority and a place where investors, businesses and residents have good access to physical and digital infrastructure. The importance of Digital Connectivity is key in supporting the development of digital connections to allow mobile working and local business to flourish.

This also allows Glasgow to maintain the attractiveness of the City Centre as an investment location.

The following policies are of direct relevance to the proposal:

Policy CPD 1: 'The Placemaking Principle'

The aim of CPD 1 is stated as the following:

'The Policy aims to improve the quality of development taking place in Glasgow by promoting a design-led approach. This will contribute towards protecting and improving the quality of the environment, improving health and reducing health inequality, making the planning process as inclusive as possible and ensuring that new development attains the highest sustainability levels.'

The principles set out to achieve this include the following points:

- *Delivering highly creative, innovative, and technical design including for infrastructure;*
- *Embedding community facilities and promoting connectivity whilst ensuring an integrated approach to infrastructure delivery;*
- *Making the city an appealing place to live, work and visit and recognising the needs of all members of society;*
- *Providing high quality amenity and respecting the historic and natural environment.*

Policy CDP 3: 'Economic Development'

The aim of CPD 3 is stated as the following:

'The Plan will promote the creation of economic opportunity for all the City's residents and businesses and encourage sustained economic growth.'

The Plan will be supportive of developments that achieve the following:

- *Supporting investment in new infrastructure and environmental improvements to unlock the development potential of constrained Economic Development locations including through the use of planning agreements;*
- *Support and improve the City's energy, transport and digital infrastructure;*

IPG3: (SG3) Economic Development

As referenced as supplementary guidance to support policy under CPD 3, the Interim Planning Guidance *IPG3: (SG3) Economic Development*, under Section 8, deals specifically with telecommunications, and would therefore be relevant in this instance. Within this planning guidance it sets out that the Council recognises the importance of new telecommunications infrastructure as part of meeting economic development objectives and maintaining the city's competitiveness. It also highlights the importance of supporting proposals for new or enhanced high speed broadband, telecommunications and digital infrastructure which would enhance the competitiveness and operation of local economic enterprises and businesses, while ensuring that any visual impact is minimised. The Council will therefore support proposals for new telecommunications infrastructure, where:

- (i) they accord with Placemaking and Sustainable Spatial Strategy policy aims and objectives;*
- (ii) high-speed broadband is provided, especially where this is delivered via discrete underground cabling;*
- (iii) the site proposed has been identified and justified as the most appropriate solution following a search for alternative locations and options, including sharing or co-location of sites. Reasons for rejecting sites should be submitted as evidence;*
- (iv) visual impact is minimized through careful and sensitive design and siting;*
- (v) it is demonstrated that cumulative impact has been considered and limited;*
- (vi) careful landscaping or screening can be incorporated into the proposal, where appropriate.*

Policy CDP 4: Network of Centres*1. Town Centres including the following:*

- The City Centre: The primary location for retail, office, commercial leisure, tourism and civic uses serving the city region as well as a national transport hub.*
- Major Town Centres (consisting of Partick/Byres Road, Shawlands, Pollok, Parkhead and Easterhouse, and are identified as the City's Strategic Centres in the SDP): These locations provide a full range of town centre uses, and are important shopping, commercial and civic destinations serving a wider population catchment than Local Town Centres.*

- *Local Town Centres (a sub network of 34 Centres): These locations serve local communities, but vary widely in scale, function and character with some being predominantly retail based and others service based. Supplementary Guidance sets out a policy approach to development that is tailored to the different types of Local Town Centre in the City.*

2. Other Retail and Commercial Leisure Centres: Locations for trading formats that cannot be easily accommodated in a town centre.

3. Local Shopping Facilities: Small scale shops and service provision to meet the day to day needs of local communities.

ASSESSMENT OF DEVELOPMENT PROPOSALS

The Plan directs appropriate uses to Town Centres in line with the 'town centres first' principle set out in SPP. Development proposals outwith town centres will be assessed in line with the sequential approach and other criteria set out in SPP and Supplementary Guidance.

Development proposals within the Network of Centres will be assessed according to the following approach:

1. Town Centres

The Council will favour proposals that:

- a. Support the primary retail, office and leisure functions of the City Centre, in accordance with Supplementary Guidance, the Glasgow City Centre Strategy and Action Plan 2014-2019 and associated Spatial Supplementary Guidance.*
- b. Support the retail function and/or improve the quality and diversity of Glasgow's Major Town Centres, subject to compliance with criteria set out in Supplementary Guidance.*
- c. Support the function of each Local Town Centre by maintaining an appropriate balance of uses, as outlined in Supplementary Guidance.*
- d. Support public transport connections between Town Centres, as highlighted in Figure 9 of Policy CDP2: Sustainable Spatial Strategy, and also promote access to Major Town centres and local shopping facilities for peripheral communities.*
- e. Support new and enhanced active travel routes to, within and between Town Centres. (Refer also to Policies CDP 1: The Placemaking Principle and CDP 12: Delivering Development)*

2. Other Retail and Commercial Leisure Centres Ensure development is: a. Complementary to and does not undermine Town Centres b. Consistent with the role and function of these centres as set out in Supplementary Guidance

3. Local Shopping Facilities

- a. Local Shopping Facilities will be protected in line with the criteria defined in Supplementary Guidance unless it can be demonstrated that there is a lack of demand for continued retail use.
- b. Significant new housing developments must include provision for new Local Shopping Facilities where any part of the development is more than 800 metres walking distance from existing Centres.

Policy CDP 9: Historic Environment

The Council will protect, preserve and, where appropriate, conserve and/or enhance the historic environment, in line with Scottish Planning Policy, Historic Environment Scotland Policy Statement, and this policy together with associated supplementary guidance (SG), for the benefit of our own and future generations. For clarity, historic environment encompasses, in this context, world heritage sites, listed buildings, conservation areas, scheduled monuments, archaeological sites, Inventory and non-Inventory gardens and designed landscapes and Inventory battlefields. The Council will assess the impact of proposed developments that affect historic environment features and/or their settings according to the principles set out in relevant SG. The Council will not support development that would have an adverse impact on the historic environment, unless SG criteria are fully satisfied. Figure 16 illustrates the extent of designated historic environment assets, with the exception of listed buildings (which is available online).

Supplementary Guidance

SG1: Placemaking Part 1 and Part 2

8. Signs and Advertising

8.1 In determining the acceptability of an advertisement display, each case will be assessed against its impact on: a) visual amenity, see Definition (not only of the property itself but also neighbouring properties and the surrounding area); and b) public safety (particularly the safety of pedestrians, drivers and other road users).

8.2 Visual Amenity - To ensure that the visual amenity (see Definition) of an advertising site or the surroundings is not adversely affected: a) all advertising signs should be of high quality materials. The Council will welcome innovative design and will look for the improvement of existing authorised signs where the opportunity arises; b) the Council will resist the accumulation of advertising clutter; c) all advertising on premises should be seen as part of the overall

design of the property and should respect its original design, not appear as an addition. d) consent will be resisted for directional signs remote from the curtilage of the premises to which they relate; e) on listed buildings, and within conservation areas, a higher quality of design and materials will be expected to reflect the property or area's character and appearance (signage should complement the original architectural style and features of the building); and f) any original or historically significant signage should be retained and incorporated into refurbishment, where possible.

8.3 Public Safety - To ensure that public safety, see also SG1 - Placemaking, Part 1, is not adversely affected, the following will be taken into account: a) proximity to traffic signals; Colours and level of luminance should not interfere or cause distraction to road and cycleway users in the vicinity of signals; b) proximity to other hazards on the road where the advertising sign may interfere with visibility or cause driver/cyclist distraction e.g. junctions, queuing traffic and pedestrian crossing points, the approach to traffic signal controlled junctions; c) cumulative impact relative to existing signage, including road signs; d) proximity to a roundabout or complex priority junction; and e) the potential obstruction of paths and cycleways, including headroom (advertising signs adjacent to any pedestrian and/or cycle route should be displayed at least 2.5m above ground level).

In respect of the above the proposal would unquestionably, given its purpose and use, encourage the active and continued use of the area through its use and, given the illumination associated with the advertisement element, create a safer and more accessible space and so ensure, as far as is practicable, safer communities through reduced fear of crime. This is also consistent with paragraph 135 (f) which seeks to ensure the same from development proposals, albeit not every form of development can be considered as requiring this. This will again be elaborated upon further and given further consideration below, albeit that such matters were set out within the supporting document submitted as part of the suite of documents at the application stage named 'Street Hubs – Beyond Connection' which specifically addresses safer communities as well as the supporting document named 'Anti-Social Behaviour Management Plan', which again addresses such matters that are considered material ones.

4.4 Details of the Street Hub design, its inclusiveness and accessibility are included within the Planning, Design and Access Supporting Statement. The award-winning design was created by urban design firm Antenna, led by Masamichi Udagawa whose work is displayed in the Museum of Modern Art in New York. It is appropriate for the Street Hub's function in terms of

scale, form, quality of materials and sustainability.

- 4.5 The siting criteria, whilst taking into account the impact of the Street Hub in terms of the character and appearance of its proposed setting, also contain considerations of public safety, including pedestrian movement, sightlines and public/highway safety.
- 4.6 The impacts of the appeal proposal in terms of relevant material planning considerations were also outlined in the Appellant's Planning, Design, and Access Supporting Statement and are further discussed in the following section containing their grounds of appeal against the Council's refusal to grant planning permission and advertisement consent for the Installation of the proposed Street Hub and associated advertising at this location.

5. Grounds of Appeal

5.1 On 1st May 2026, Glasgow City Council as Local Planning Authority refused the applications for both full planning and advertisement consent. The reasons for refusal for the full planning application are set out below:

- 1. The proposal was not considered to be in accordance with the Development Plan and there were no material considerations which outweighed the proposal's variance with the Development Plan.*
- 2. By reason of its siting and design, the proposed development would be a conspicuous and incongruous feature in the local townscape and would have a detrimental impact on visual amenity and character of the conservation area. It would, therefore, not be in accordance with the National Planning Framework 4 Policies 9 and 14 and the Planning Authority's guidance through the City Development Plan on visual amenity in relation to Advertising: SG1 (Part 2) (Signs and Advertising).*
- 3. That by way of its siting and scale, the development has the potential to create an obstruction to pedestrians. As a result the development would not be considered to be acceptable in terms of public safety and as such is not in accordance with the National Planning Framework 4 Policy 23 and the Planning Authority's guidance through the City Development Plan on public safety in relation to Advertising: SG1 (Part 2) (Signs and Advertising).*

5.2 The appellants note the concerns of the LPA, but fundamentally believe that the proposal to which this appeal relates represents a sustainable form of development, with any perceived visual or other harm outweighed by the myriad of significant public benefits. On a procedural matter whilst this appeal specifically focuses on the full planning proposal, the appellants contend the LPAs reasons for refusal to both applications.

5.3 The Appellants consider that the policy tests used to determine the planning application have relied too heavily on its consideration that the proposal would be significantly detrimental to the visual amenity of the contrary to the relevant policy objectives, as well as consideration that the proposal would see the removal of 2No. existing kiosks which forms part of the appellants estate and offers no contribution to the appearance or setting of the streetscene.

- 5.4 Within the National and Local Planning Policy, key themes emerge in relation to the strategic directions and policy objectives. The proposal to upgrade the appellants estate to Street Hub units appropriately responds to these policies by:

Providing communication infrastructure in a strategic location that will be a high-quality design and provide enhanced digital connectivity;
Improving public safety through providing access to emergency services, increased street illumination and reducing anti-social behaviour currently present in existing BT payphone booths;
Achieving advertising displays that are appropriately illuminated and designed to ensure no hindrance to surrounding transport networks;
Promoting accessibility and inclusivity with fully accessible community features;
Enhancing and improving the quality of the public environment and ensuring valued characteristics are protected and the proposal commensurate with surrounding land-uses, to create safe, functional places with strong sense of connection; and
Promoting sustainability with units being powered by 100% renewable carbon-free energy.

Overall, the proposal is considered to be a highly appropriate response to strategic vision and objectives.

- 5.5 The Appellants consider that the design of the Street Hub's in terms of its sleek modern and innovative appearance is more consistent with that found within many streetscene settings throughout the country. The design, as discussed above, is of high quality and reflects a historical design which is a common and expected feature across many streetscapes around the United Kingdom, including that of non-heritage and heritage importance. It is also important to emphasise that the proposal is a means for BT to meet its obligations under the USO with Ofcom to provide a universally available service at this location, by locating the required services in an area that would be of most benefit to the public.

Visual Harm & Heritage Impact Considerations

- 5.6 It is accepted that balancing visual impact with the functional requirements of street-based development can be challenging, especially when in the presence of heritage assets. This assessment must consider both the immediate street scene and the wider visual context in which the proposal would be viewed. Street scenes inevitably evolve over time in response to technological change, user demand and urban growth. This is particularly

relevant for telecommunications and advertisement structures, which form an integral part of connected, sustainable cities.

- 5.7 The proposed Street Hub has a slender, contemporary profile, considerably reduced in bulk compared to that of an existing phone box within the appellant's current estate. Its appearance is consistent with other freestanding communication and advertising units already present across the UK, notably elsewhere within Glasgow City Council. The Street Hub represents an evolution of BT's infrastructure, designed to replace outdated kiosks with a more efficient and visually streamlined form.
- 5.8 The primary function of the proposal is for the upgrading of appellant's (BT) existing communications estate. In this instance 2no. existing kiosks will be removed to make way for the installation of a Street Hub at a slightly revised location. This development seeks to provide a function to nearby users, allowing connectivity and promoting inclusion with the aim of connecting people and places, as well as the additional benefits in an area with a strong commercial context and where telecommunications infrastructure is already established.
- 5.9 Moving onto matters relating to the appeal site and proposal, Govan Road is a key, arterial route through this area to the West of Glasgow city centre and a highly commercial locale with modern shop frontages at the ground floor level of tall buildings (often with office and residential space above). The unit is positioned on a wide area of pedestrianised highway outside of the Govan subway station and bus depot (itself redeveloped circa 2016). However, it is important to note that despite its modern surroundings the site is found within the Govan Conservation Area (albeit towards the designation's Eastern boundary). It is recognised and acknowledged that the Conservation Area has significance related to important views and gateways to historic buildings and areas of open space (Elder Park) and is described as the following in the appraisal document:

"This area includes Govan Cross and the traditional street pattern which extends as far as Elderpark Street to the west. The area contains redevelopment opportunities that require to take account of the historic layout and the strong character of surviving fabric including the fine buildings and monuments at and around the Cross. The area has a homogenous quality due to the tenemental form but this breaks down at Water Row and directly to the south-east of the Cross. Behind the properties on Burleigh Street, Harmony Row and Langlands Road there is also a loss of character and cohesion due to the alignment of Golspie Street and the car park that it encircles."

Furthermore, the key features are described as:

“Govan’s distinctive character lies not only in the quality of the buildings and monuments but also in its rich social history. This history is reflected in the layout and design of the built environment, with the names of streets, buildings, spaces and monuments often being connected to the people and events that shaped the area.”

As set out in the case officer’s report, the Council’s primary concern appears to be that the proposed Street Hub ‘*would be a conspicuous and incongruous feature in the local townscape*’. Whilst these concerns are noted, the appellants do not agree. In selecting this location, it is considered that the proposal would be commensurate with the existing form and surrounding land use of the locality in keeping with the busy, commercial area of Glasgow, even when accounting for the presence of important heritage assets.

5.10 As indicated in Figures 2-10, this very wide, pedestrianised section of Govan Road already contains an array of existing street furniture including bus shelters, litter bins, benches, bollards, lampposts, bike racks, road information signs, utility cabinets and the aforementioned BT payphone kiosks. Temporary seating and signage is also occasionally present at nearby commercial properties. The appellants contest that the presence of existing clutter means that rather than appearing visually incongruous, the proposal will respect the established appearance of the streetscene and effectively assimilate into its surroundings whilst respecting nearby heritage assets and pedestrian mobility (which will be discussed in greater detail in the following section of this statement).

5.11 It is also important to note the site’s relative proximity to a category b listed building on the opposite side of the road. The full Historic Environment Record for this monument describes the asset as:

‘2-storey sneaked rubble gothic block containing shops under church hall and church officer’s house. Ground floor to Govan Road concealed behind modern cladding, but gothic door survives at Greenwell Street. House at W end, 1st floor and attic of gusset. 1st floor sash windows under false pointed arches with trefoils. Cornice broken by 3 segmental arched dormer windows with fleur de lis finials. Oculus in dormer at head of gusset. 1 ridge and 2 wallhead stacks; slate roof. Hall has 3 pairs of 3 lancets facing Govan Road linked by a continuous hoodmould. E elevation blank rubble. Plain

interior. Behind hall: 2-storey rubble and brick extension, and a square stone tower, with eaves cornice, large wooden belfry. This replaced the original 150 foot spire.'

- 5.13 The appellants do not dispute the presence of nearby heritage assets, nor wish to downplay their architectural and historical significance or contribution to the wider area. However, the development has been progressed in what could be considered one of the 'least sensitive' areas of this part of Govan with regards to potential heritage impact. It is considered that there is a sufficient distance of separation to the nearest assets, with the unit viewed more so in the context of the modern, recently redeveloped subway station, bus depot and pedestrianised highway. The appellants therefore consider that any harm to heritage assets or the wider streetscene will be at a negligible to very minor level.
- 5.14 The proposed luminance levels of the Street Hub's screens have been kept to a technical minimum, with all displays being of a static nature lasting for at least 10 seconds, mirroring the nearby digitised bus shelter displays and other freestanding digital advertisement structures. All of which demonstrates the appellant's significant efforts to respect the sensitive surrounding area to make sure that the proposal contributes positively to its local character and that any visual impact or harm to heritage assets is strongly outweighed by the myriad of public benefits (discussed in further detail in chapter 6).
- 5.15 While any addition to the public realm introduces some visual change, this does not equate to significant or severe harm. Through sympathetic siting and a high-quality design, the development will integrate well within its urbanised, commercial context, enhancing the area's connectivity and public amenity. Given the dual function of the proposal, the Street hub also has a much more slender and slimline profile than that of an existing phone that will be removed and indirectly converted into a Street Hub.
- 5.16 The proposed development is highly comparable in form and appearance to the existing digital advertising units than can be found elsewhere in Glasgow City Council, most commonly at bus shelters. Freestanding digital advertisement structures including BT's first generation Street Hubs (InLink units) and other communication hubs can be found across the authority, as well as far larger 48-sheet digital billboards. As shown in the photos displayed within the Appendix, the deployment of similar advertisement structures could have been considered as adding visual clutter which was at odds with historic surroundings, but over time these have become an established part of their streetscene settings accepted by the Council.

These units along with other forms of digital advertising sets a precedent of sorts in favour for this form of development in Glasgow.

- 5.17 The similarities of BT Street Hubs to digital bus shelter displays and other communication hubs in terms of their size, scale and bulk demonstrates how the development will be able to effectively and safely assimilate into the streetscene, as well as providing significantly greater telecommunications services and public benefits compared to bus shelter displays. Furthermore, this stretch of pedestrianised pavement is very wide allowing for a significant amount of space retained following Street Hub installation. Through careful alignment with the unit positioned items in line with other items of street furniture there will not be a reduction in openness of the streetscape or an introduction of visual clutter. As will be discussed below pedestrian flow will also not be impacted.
- 5.18 Clearly there will always be challenges faced in finding a balance between limiting any harm created by the siting of development upon heritage assets when weighed up against the public benefits it will bring to the area. It should also be considered that streets within conservation areas, like all streets, will always be subject to change through time, changing demand, and users expectation. This is of particular relevance when considering advertisement and telecommunication within street scenes throughout the country with a focus on sustainable and connected cities. The appellants contend that whilst there could be some less substantial harm, overall, this would be significantly outweighed by the public benefits of the scheme.
- 5.19 It is the appellant's view that the prevailing historic character, sense of place, and local distinctiveness of this part of Glasgow including the listed buildings which can be sustained at the same time as delivering this state of the art, multi-faceted, publicly-accessible development. The proposal is therefore considered to be in accordance with the National Planning Framework 4, Policies 9 and 14 and the Planning Authority's guidance through the City Development Plan on visual amenity in relation to Advertising: SG1 (Part 2) (Signs and Advertising).



Figure 5 – Existing street scene from the Northwest towards the appeal site.



Figure 6 – Proposed street scene from the Northwest towards the appeal site with the Street Hub in-situ.



Figure 7 – Existing street scene from the Southeast towards the appeal Site



Figure 8 – Proposed street scene from the Southeast towards the appeal site with the Street Hub in-situ



Figure 9 – Existing street scene from the South towards the appeal site.



Figure 10 – Proposed street scene from the South towards the appeal site with the Street Hub in-situ.



Figure 11 - Existing street scene from the West towards the appeal site (side on).



Figure 12 - Proposed street scene from the West towards the appeal site with the Street Hub in-situ (side on).

Pedestrian Flow/ Highway safety

- 5.20 In their decision making the Council provided a secondary reason for refusal based on consideration that the appeal proposal would create an obstruction to pedestrians to the detriment of highway safety considerations. Whilst these concerns are noted, the appellants do not agree. In determining the appropriate siting of the unit and suitable width of remaining footpath widths, consideration was given to the Department for Transport Manual for Streets (2007) which confirms that there is no minimum width for footways. It suggests that in lightly used streets, the minimum unobstructed width for pedestrians should generally be 2000mm, and that in areas of higher pedestrian flow the quality of the walking experience can deteriorate unless sufficient width is provided.
- 5.21 Inclusive Mobility (2002) advises that ideally the width of the footway should be 2000mm to facilitate two people in wheelchairs to pass each other comfortably. Where this width is not possible, a clear width of 1500mm should be provided, with an absolute clear minimum width of 1000mm in exceptional cases. The phrase 'clear' refers to the effective width taking into account permanent obstacles on the footway such as streetlamp standards, trees, telegraph poles, bus shelters for example. Furthermore, the Disability Discrimination Act (DDA) itself recommends a minimum footway width of 1200mm.
- 5.22 Considering the guidance above, the unit is considered compliant with the recommendations, with 2.9m of the front section of the adopted public highway retained with a vast expanse of pedestrianised highway outside of the subway station to the South. Following the installation of the structure 600mm from the kerb, there would be a substantial amount of useable and unobstructed footpath at this point, which is more than sufficient and above the recommended guidance, and furthermore will not impact movements for pedestrians utilising the nearby street furniture or the pedestrian flow through the area. The appellants therefore consider that whilst pedestrian flow is expected to be high, the footpath will remain largely unobstructed allowing for the safe movement of pedestrians, including wheelchair users, people with mobility or visual impairments and push chairs.
- 5.24 The photographs below, and photomontages above demonstrate the primary pedestrian walkway to the rear of the pavement will remain largely uninterrupted by the development. As shown, the BT Street Hub unit has been carefully positioned so that it is aligned with the adjacent bus shelter and litter bin also positioned at the front of the pavement. This alignment will help to preserve pedestrian movability and maintain highways safety for

users including those in vehicles and on bike. As such, contrary to the LPA's assertion, it is clear that there would be minimal conflict with the main pedestrian routes and desire lines. The overall legibility of the road network would therefore be preserved on a reasonably wide section of public footpath to avoid impacting driver attentiveness to cause distraction.

- 5.25 It is also worth reiterating that as part of the development 1 no existing BT payphone kiosk will be removed from Govan Road, positioned to the rear of the bus shelter will the Street Hub repositioned so that all street furniture is carefully aligned and consolidated. A second kiosk is also set to be removed from Great Western Road, admittedly this structure is found some distance from the appeal site itself, however its removal is still a critical component of the development. Overall, these removals will result in 1.6 metres of floor area and 3.5 cubic metres in overall density removed from Glasgow City Council's public highway, thereby helping to declutter and enhance pedestrian moveability. This will allow for the achievement of high-quality, accessible environments for all users at two separate locations.
- 5.26 The introduction of a BT Street Hub, a relatively small-scale development will be in-keeping with its well-lit, commercial surroundings in Glasgow, an area approximately 2 miles West of the main city centre. These characteristics help to create a modern environment where the overall contrast between the adverts associated with the structure and the streetscene will be minor. Furthermore, the level of luminance of the screens will be kept to a technical minimum in line with the limits specified in the ILP, as well as imagery that is static and changes only every 10 seconds in order to avoid creating distractions for road users as much as possible.
- 5.27 Given the above, it is clear that whilst the development is found in a location of high footfall, the proposed Street Hub's careful positioning kerb-side on a very wide pedestrianised section of public highway, that avoids the primary pedestrian desire line to the rear of the footway, would in no way undermine the free flow of pedestrians to a significant degree. It is therefore considered the above sets out the position in respect of the LPAs reason for refusal of these applications and demonstrates the development's accordance with the National Planning Framework 4 Policy 23 and the Planning Authority's guidance through the City Development Plan on public safety in relation to Advertising: SG1 (Part 2) (Signs and Advertising).

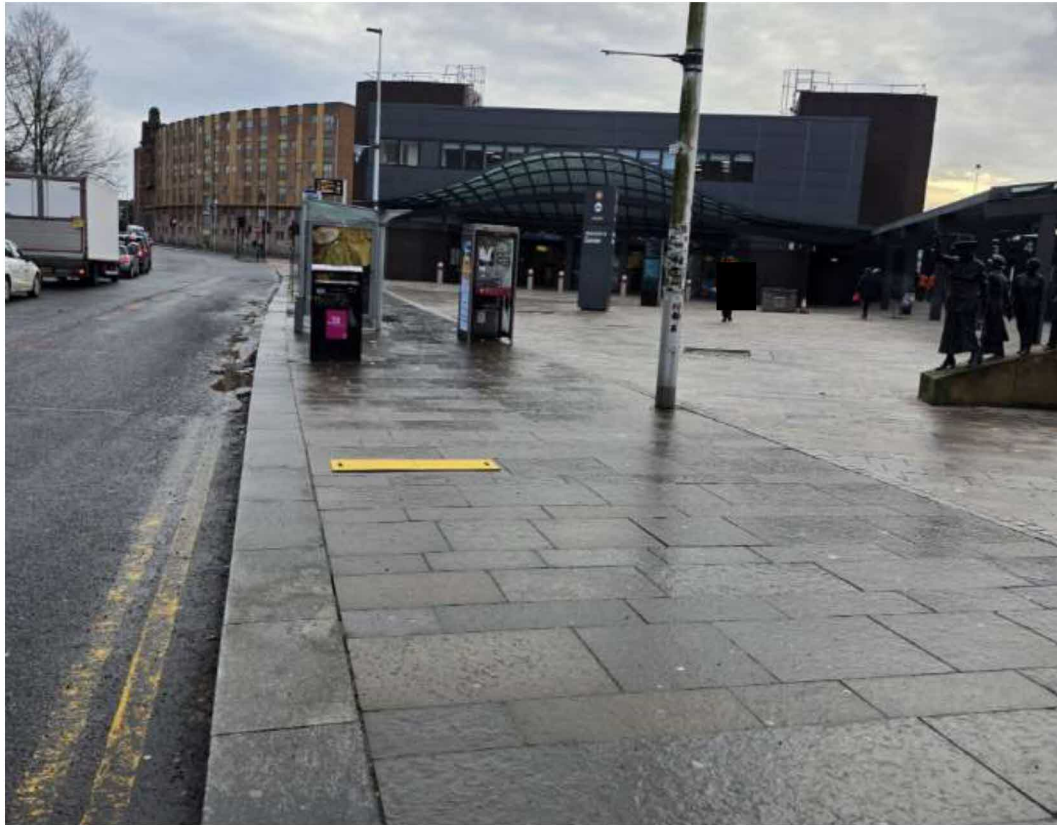


Figure 14 – Main pedestrian desire to the rear of the footway.

6.0 Public Benefits

- 6.1 The appellants are concerned that the myriad of public benefits of the proposed development are not being properly accounted in the planning balance. This chapter therefore looks to reiterate the array of public benefits being delivered by the units.
- 6.2 In respect of digital infrastructure and economic development, these new Street Hubs are the perfect form of infrastructure for positive change, enabling councils to collaborate and configure infrastructure to support smarter, safer and more sustainable places for residents, visitors and businesses alike. BT is moving public connectivity forward, evolving their existing and long-established payphone estate further with a move from the 1st Generation 'InLink' units that have seen deployment throughout the country, to the proposed Street Hubs, a sleek modern answer to the demands of a digitally connected, converged-media society and at no cost to the Council.
- 6.3 On this point, recent press releases highlight that BT gifted up to £7.5m of free advertising space to local businesses via its Street Hub units in 2023-24 as the new units are rolled out to new locations across the UK, whereby BT (in conjunction with the LPAs) contacted local businesses and the public in these areas in order to encourage them to nominate local firms who could benefit from the offer.
- 6.4 This came as a new BT study found that more than 60 per cent of small businesses agree that local advertising would help to increase awareness of their business, with 40 per cent saying it would encourage more people to shop at their local high street. However, almost half (49 per cent) said that cost was a major obstacle to them investing in local Out Of Home (OOH) advertising. BT is now taking action to remove one of the biggest barriers to adoption, with the Street Hub's digital advertising screens designed to help small firms attract more customers following the local and national lockdowns.
- 6.5 Additionally, BT's new Street Hub units can also help local councils achieve their social and economic improvement and sustainability goals. Each local authority is provided with 5 per cent of total screen time on each Street Hub (which equates to 875 hours a year for each screen on every unit) to promote local community and municipal services such as food banks, health and social care or leisure activities. They can also inform the local community about developments or issues affecting their area. For example,

during the peak of the Covid-19 pandemic, the 400 existing Street Hub units across the country played a vital role in displaying key public health advice from Public Health England and local councils, provided to the Local Authority on each unit, for free. Furthermore, the Government's ambition, as set out within the National Infrastructure Strategy, 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.

- 6.6 With nearly two thirds of all local authorities aiming to become carbon neutral by 2030, each Street Hub unit can also be fitted with air quality and CO2 sensors. This will provide local councils with the insight needed to help them take action to improve air quality, contributing to the health and wellbeing of local people, and has been used by council's already.
- 6.7 The above shows how the proposed units would assist in council's agendas to have more people return to our high streets, not prejudice this, and consistent with National Policy in respect of creating safer streets and encouraging the active and continued use of public spaces. The overall aim of the Street Hubs is to enhance digital connectivity and services for communities through features such as free mobile device charging, access to an emergency call button, charity helplines, and local wayfinding via an integrated tablet, as well as the additional benefits set out previously. BT's InLink and Street Hub estate consists of approximately 1000 Units, across numerous UK cities. The usage levels of the entire estate, from the period of 1st April 2024 to 31st March 2025, are shown below. During this time period:
- Over **1.6 million phone calls** were made, including:
 - o 1,464 to **Childline**
 - o 4,465 to **End Youth Homelessness**
 - o 1,528 to **Samaritans**
 - o 1,097 to **Missing People**
 - **3.9 million people** connected to free Wi-Fi, with **780,254** new users registering this year.

The above data is a clear indicator of the value that the existing Units bring to the general public. Just under 6% of the UK's population connected to the free wi-fi in the last 12 months, with new users being added continuously throughout the year. This trend is expected to continue throughout 2025 and

beyond.

- 6.8 It is considered that the public benefits were in fact set out in detail as part of the application submissions, to which the council have offered little or no weight to as stated. Instead, as stated the consideration of the council that the units are simply obtrusive and unnecessary is contrary to the NPPF whereby it is clear that councils should not question the need. The applicant is upgrading their public estate with a new modern digital unit reflective of the times, while also giving due consideration in respect of their Ofcom requirements for such provision. Access to such infrastructure, and its free services, provides significant public benefits, which is essential for sustainable economic growth and plays a vital role in enhancing the provision of such services within the local area. This type of free connectivity allows residents, businesses, and visitors to the area to access essential public networks and assists in reducing digital exclusion within the Local Authority area.
- 6.9 Furthermore, we consider the addition of the Street Hub unit in the proposed location will improve the public realm and pedestrian experience, particularly through the following which would be afforded weight in support of the proposal:
- Providing in-direct street lighting from the illuminated advertising signs to increase pedestrian safety.
 - Providing access to contact emergency services, phone charging ability and connection to Wi-Fi with no charge that are accessible for all members of the community.
 - The unit will be a high-quality design complementing the existing development on site but also enhancing visual amenity.
 - Consistency with mixed-use setting: integration into a vibrant, commercial urban area and commensurate with the surrounding land uses.
- 6.10 The benefits of the proposal, some of which have been addressed in detail above and particularly with regards to opportunities to reduce crime and antisocial behaviour, should be afforded a string degree or weight. The below image provides a snapshot of what a Street Hub is, as additional information is provided in further detail with the accompanying document submission.

What is a Street Hub?

- **Street Hubs are free to use, fully accessible community assets connecting and improving local streets in urban areas.** At no cost to taxpayers or end users, Street Hubs provide communities with an unprecedented suite of essential urban tools:
- **Ultrafast public and encrypted Wi-Fi**
- **Powered by 100% renewable carbon-free energy**
- **Inspected weekly and cleaned at least every two weeks, monitored 24/7**
- **Free phone calls**
- **Display community and emergency (i.e. police) awareness messaging**
- **Ability to house IoT sensors such as air quality, traffic etc.**



Figure 16 – Extract of BT Street Hub product statement highlighting an array of the public benefits.

7.0 Other Relevant Planning Appeal Decisions

- 7.1 Visual impact was a consideration in recent appeal decisions for similar structures to that being proposed whereby, and even when considering the different locations to which these appeals relate the Inspectors determined the following in respect of similar proposals and being viewed within the context of the surrounding street scene as opposed to being viewed in isolation, which principles should still apply in this instance:

Appeal ref: APP/Z5630/H/3209488, Fife Road, Kingston upon Thames:

“Therefore, due to the smaller footprint and slender profile of the proposed kiosk, the proposal would not be visually intrusive or create visual street clutter. The proposal would also not represent an incongruous addition due to its similarities with the existing digital signs within the town centre.”

Appeal Ref: APP/N5090/Z/22/3296138, High Street, Barnet:

“given the limited amount of street furniture nearby, and existing advertising, which is primarily on the buildings themselves, these proposed advertisements would not introduce a significant sense of visual clutter. Although I did not observe any other nearby digital displays on my visit, modern, statically illuminated digital displays are not an uncommon feature in commercial High Street locations such as this.”

Appeal Ref: APP/J2373/W/22/3305075, Whitegate Drive, Blackpool:

“Street furniture in the immediate locality of the appeal site is limited to a phone box and street lighting column. As such, the area does not have a cluttered feel. The proposed street hub unit would replace the existing phone box, albeit in a new, close by location. Whilst it would not result in a reduction of street furniture in total, it would nevertheless not result in any increase in this locality therefore it would not be an overbearing addition. It would be of a slimmer design and smaller footprint to the existing phone box and would be viewed in association with the commercial backdrop. Thus, it would be in keeping with this commercial setting.”

- 7.2 In addition to the above, there are numerous examples of street furniture and advertising displays of a similar nature, which should be considered when assessing any potential impact on the setting and/or appearance of any heritage assets. As a result, the character of the area or listed building in this instance, with particular regard to street level, is not exclusive of similar structure to that being proposed and therefore the proposal in this instance should not be considered as being visually incongruous. This was covered in a recent appeal decision whereby the inspectorate outlined that:

Appeal Ref: ADA-180-2017, 40 High Street, Dundee:

"I do not agree with the council's view that the proposed illuminated advertisements would have an adverse impact on amenity. I observe that the area's character is heavily influenced by the busy retail and commercial environment at street level, featuring information boards and other street furniture, a number of existing advertisements, and shopfronts with illuminated signage and display windows with internal lighting, including in the adjacent Primark store. I do not consider that the introduction of the proposed digital advertisement displays would be at odds with this character. The size of the proposed advertisements is broadly comparable with others in the area. Although the site's busy city centre location means the proposed advertisements would be seen by large numbers of pedestrians, their positioning between two street trees means they would not be overly prominent in the street scene. The advertisements would generally be viewed in context with the modern Overgate shopping centre nearby, with its illuminated signage and window displays, and would not appear obtrusive in that setting. I therefore do not consider there would be any harm to the amenity of the area, including the character or appearance of the conservation area, which I am satisfied would be preserved. I also do not consider there would be any adverse impact on the setting of any of the listed buildings in the area."

Appeal Ref: APP/J2373/H/22/3305072, Whitegate Drive, Blackpool:

"The appeal site falls within the Raikes Hall Conservation Area (the RHCA) whose significance is partly derived from the largely unaltered original grid street pattern of attractive suburban residential properties. Whitegate Drive is one of the main routes through the RHCA and contains an array of businesses, including the retail unit and café immediately adjacent to the appeal site. This gives the locality a strong commercial character. The appeal site makes a neutral contribution to the RHCA."

APP/L5240/W/21/3285398, High Street, Croydon

'The removal of the metal and plastic BT phone box would not harm the townscape of the street or the attractiveness of the public realm. I appreciate that the street hub would be taller and broader than the phone box which it would replace. However, it would be narrower. It would have more slender proportions, a plainer form, slicker detailing, and a restrained, dark monotone colour, giving it a more neutral, background character in the street than the more corporately identified phone box. It would appear less bulky and less conspicuous than the phone box it would replace.'

APP/C3105/W/25/3366449, High Street, Banbury, Cherwell

'The appeal proposals would involve the replacement of an existing relatively modern telephone kiosk that already displays sizeable, fixed advertisements. As such, the proposal would not add to street clutter. The proposed structure although taller and wider than the existing telephone box, would have a slim profile resulting in a reduced footprint and bulk. In the context of other tall elements within the streetscene, I do not consider the size of the proposal would appear untoward.....the street hub would have a modern design and the use of large digital displays would result in a more striking appearance than the existing structure to be replaced. Still, subject to relevant conditions that control the display of the digital screens, notably the use of static imagery and illumination, I am satisfied that the proposal would not stand out as an incongruous, over-dominant or unduly prominent feature within this existing commercial streetscene.....Views of the proposed development alongside each of the listed buildings would be available. However, the slim profile of the proposed development would mainly result in only oblique views being available in connection with nearby listed buildings. Additionally, the views would also be somewhat interrupted by other features such as existing mature vegetation, parked vehicles, and other street furniture and paraphernalia. Indeed, the setting of each of the above listed buildings is already largely defined by the busy commercial activity, including a range of modern signage and street furniture. Accordingly, I find the effect on their setting and significance would be neutral in this instance. Likewise, given my above findings, I find that the effect on the character, appearance and significance of the CA, as a whole, would also be neutral.'

- 7.3 The above only represent a small number of appeal decisions in allowing appeals on the basis that the LPA refused these applications on. Furthermore, with regards pedestrian flow and moveability the appellants also wish to highlight the following:

Appeal Ref: APP/K5030/W/22/3301293, Queen Victoria St, City of London

'In terms of pedestrian flow, because of its marginally greater width combined with much smaller footprint the Street Hub would be less of an obstruction than the existing two kiosks. In addition, the site is in a position close to where the pavement widens to turn the corner and pass under the large canopy at the entrance to No. 60. Furthermore, from my observations at a busy time of day and of the surrounding land uses it would appear unlikely that this section of pavement is ever subject to a density of movement whereby obstruction would occur with any harmful effects.'

Appeal Ref: APP/K5030/W/22/3301229, High Holborn, City of London

'On the second issue the Council argues that would be an unacceptable obstruction by impeding pedestrian flow and sightlines. However, the existing BT Payphone kiosk takes up 1.58sqm of footpath space whereas the Street Hub would occupy just 0.43sqm. It would therefore be less of an obstruction to movement and visibility than the kiosk to be removed and in any event the pavement outside Nos. 320 & 322 is particularly wide given that it extends to include the colonnade.'

Appeal Ref: APP/Z0116/W/25/3367960, Southmead Road, Bristol

'The hub in appeal G would be in general alignment with nearby bike storage racks, and both it and the racks would be at a similar distance from the nearside edge of the carriageway. As such, the hub would not lead to a further material reduction in the depth of the unobstructed parts of the pavement in this area. Nevertheless, some future users of the hub would reasonably expect to sit or stand close to it, and by doing so, it is possible that the depth of the remaining parts of the clear pavement would be reduced. However, such obstructions are likely to be infrequent and for short periods of time. Any resultant reduction in the free flow of pedestrians past the development would therefore be occasional and temporary. Notwithstanding this, the proposed removal of the phone kiosk outside of Lidl would widen the available part of the pavement in a location where there is an existing pinch-point. This would be of benefit to the ease and flow of pedestrian movements past it. For these reasons, the development as a whole would not harmfully reduce the convenience or flow of pedestrian movements in the area.'

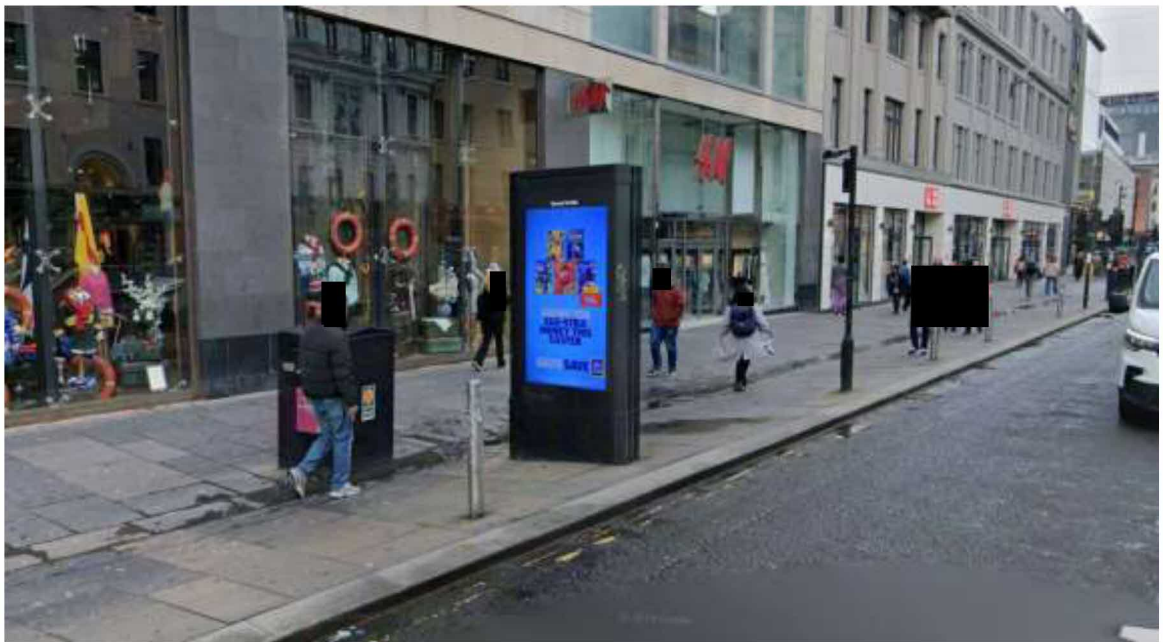
8.0 Conclusion

- 8.1 Balancing the visual amenity of an area and the impact that additional street furniture may or may not have is an issue for central government, local government and statutory undertakers alike. The necessity to address all the pertinent factors in the consideration of such proposals is imperative to ensure that the most appropriate decision is reached. However, this must be undertaken correctly and against what would be relevant and material planning considerations at the time of assessment.
- 8.2 Relevant legislation, government advice and development plan policy must be taken into full account when arriving at a decision. The relevance of the key issues relating to the benefits of the Street Hub in terms of social inclusion and economic support, by providing free Wi-Fi connectivity and the other services, must be weighed against the visual harm in the wider public interest and be based upon the particular merits of the Street Hub design and scale in relation to its contextual siting in each case.
- 8.3 The appeal proposal for a Street Hub at this location forms part of a wider Street Hub project across the council area which will provide free ultra-fast Wi-Fi to the local community, as well as a number of other added benefits which these Street Hub units will provide, all of which seek to encourage people back to our high streets in a sustainable way and support local people, businesses and visitors alike, as well as encouraging the active and continual use of public areas and so creating healthy and safer communities. It has been demonstrated within this appeal that the current context of the area is unlikely to be significantly impacted by the introduction of the proposed street Hub, nor would public safety be detrimentally impacted upon either by way of Highway Safety or perceived crime related matters. The Appellant considers that the Council's reasons for refusing this application is unreasonable and not based upon any evidence to support them in terms of degree of impact if any at all when weighed against the myriad of public benefits.
- 8.4 The Planning Local Review Committee of the Council is respectfully requested to consider the merits of the appeal proposal based on the evidence provided in support of this appeal and to approve both planning permission for the appeal proposal.

9.0 Appendix 1 – Other digital advertisement structures in Glasgow



BT InLink – Bothwell Street, Glasgow



Freestanding Bauer Media digital advertising unit – Argyle Street.



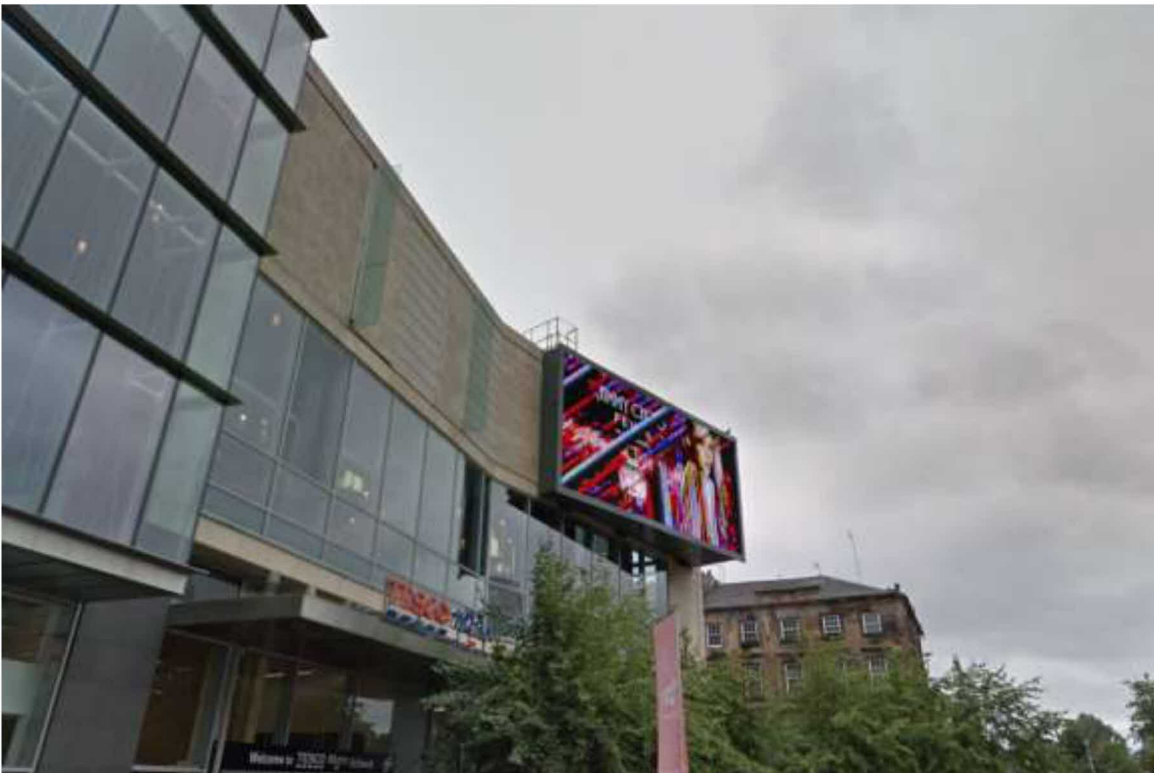
Freestanding JC Decaux unit with defib – Buchanan Street, Glasgow



Digital bus shelter displays – Argyle Street, Glasgow



Digital bus shelter displays – Union Street, Glasgow



48-sheet billboard display – St Encoch Square, Glasgow.