

Delegated Report

Planning and Advertisement Consents Applications

Planning Application No: 20250664 and 20250665

Location: Land Opposite 154 Parrock Street Gravesend Kent

Description: **Planning:** Installation of 1 no. new communications Kiosk with integrated defibrillator and advertising display.
Advert: Application for Advertisement Consent for 1 no. digital advertisement display within proposed new communications kiosk.

Applicant: Mr Thomas Johnston

Site Visit Date: 15 July 2025

Submitted Documents/Plans

Application form
Drawing no. CK0135/01A (Location Plan)
Drawing no. CK0135/02A (Site Plan)
Drawing no. NWP-KIOSK/001 (Elevations)
Kiosk Overview and Specification
Kiosk Management Plan
Planning Statement

[Further to the KCC Highways comments, the applicant was approached to amend the proposal. Revised plans were then submitted.]

Superseded Drawings:

~~Drawing no. CK0135/01 (Location Plan)~~
~~Drawing no. CK0135/02 (Site Plan)~~

Relevant Planning History

There is no relevant planning history.

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS11 – Transport
- CS19 – Design and Development Principle

Gravesham Local Plan: First Review (1994)

- T1 – Impact of Development on Highway Network

Paragraph 34 of the NPPF (2024) sets out that policies within adopted local plans should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary. Such reviews are also a legal requirement as set out in Regulation 10A of the Town and

Country Planning (Local Planning) England Regulations 2012.

The Council undertook such a review in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the NPPF (2024), the Council will also seek to replace these.

National Planning Policy Framework (2024)

- Section 2 – Achieving sustainable development
- Section 4 – Decision-making
- Section 9 – Promoting sustainable transport
- Section 12 – Achieving well-designed places

Supplementary Planning Guidance

- Design for Gravesham – Design Code (2024)
- Supplementary Planning Guidance 3 – Advertisement control policy guidelines 2020

Consultations, Publicity and Representations

Consultees

Kent Police

We have considered this application regarding Crime Prevention Through Environmental Design (CPTED) in accordance with the National Planning Policy Framework (NPPF). Design and Access Statements (DAS) should demonstrate the design helps create an accessible and safe environment while minimising crime and disorder and fear of crime. Secured by Design (SBD) is the official UK Police flagship initiative combining the principles of designing out crime with physical security, found at www.securedbydesign.com.

I have reviewed the submitted documents and crime statistics for the local area for this application. Colleagues around the country were consulted to obtain up to date feedback on issues where these units are currently installed and active. I have significant concerns with the proposed units, as I do not believe that the resultant development would meet the requirements of:

- The National Planning Policy Framework 2021 paragraph 92(b); which states that Planning policies and decisions should aim to achieve healthy, inclusive and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion...
- The National Planning Policy Framework 2021, paragraph 130(f) which states that "Planning policies and decisions should ensure that developments create places that are safe, inclusive and accessible... and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience".

Whilst I acknowledge the benefits that free calls and Wi-Fi will bring to members of the public, I also have significant concerns regarding the opportunities for crime and ASB that they may create. Please see below for detailed reasons for concern;

Public Safety

High Streets and adjacent areas create significant demand on policing in terms of incidents, particularly during The Night Time Economy. These areas are deemed crowded places because of the number of people occupying the streets day and night. They require additional protection for the public in the form of formal police live-monitored CCTV. It is imperative for police to be able to monitor in real-time what is happening in these areas, and for the officers monitoring the cameras to be able to accurately identify, track, record and report incidents as they are happening. These CCTV cameras are utilised daily to detect and record crime, and also to direct officers to incidents or track and intercept offenders as they attempt to escape. The footage they capture is regularly used in formal criminal proceedings as evidence to prosecute

offenders and can sometimes, be the crucial piece of evidence in securing a prosecution. Following consultations with colleagues within our CCTV Office, it has been identified that the proposed location of new illuminated advertising boards can have a detrimental impact on our ability to monitor and detect crime utilising our CCTV network. This has had a direct detrimental impact on our operational response to crime or incidents in progress at these locations, undermining our ability to apprehend and prosecute offenders. The glare caused by these screens creates problems for our CCTV cameras, in that the brightness of the screen creates colour contrasting, darkening and softening of the images, reducing visibility and our ability to identify and monitor individuals. In addition, depending on the advert being displayed, we also experience colour casting, which again affects our ability to identify and describe individuals being monitored. Previous incidents have included inaccurate descriptions being given out to officers on the ground, offenders being lost in pursuit, and footage being of such low quality that it has no evidential value. We have experienced incidents elsewhere where passive CCTV images are also of no evidential use as the advertising screens in shot have diminished the picture quality.

Despite these areas being lit with street lighting, the brightness of proposed advertising boards interferes with the internal image processing mechanisms of the CCTV cameras themselves. The way images, brightness and focus are processed by cameras means that there is little to nothing police can do to improve the impact that these signs have on the camera image quality when live tracking an incident. A common problem experienced by the police is when tracking an individual during a crime in progress, the CCTV operator moves the cameras to follow them wherever they are going – when one of the illuminated advertising boards comes into shot, the camera automatically reacts to this sudden light source, often throwing the image brightness, contrast and focus out. This can take several seconds to correct itself, giving offenders ample time to escape from view and avoid capture.

Kent Police has a focus on public safety and preventing sexual violence in the Night Time Economy. A significant element of our effective response is our ability to monitor areas of Night Time Economy as described above, and at present our CCTV control room is able to maintain reasonable coverage to maintain public safety. We have significant concerns that if additional light sources, particularly of the type submitted in this application are introduced, then our coverage would be impacted to the point that it may create a public safety risk.

Drugs offences & ASB

Evidence around the country, particularly in city centre locations, shows that these units are regularly abused to support the purchase and supply of illegal drugs. Dealers and buyers of drugs are known to utilise the free Wi-Fi facilities and free calls to anonymously arrange for drug deals to take place. This is of particular concern where units are proposed in locations that are not currently covered by police monitored CCTV. This abuse of the units also creates a noted increase in antisocial behaviour around the unit, with users regularly congregating to make use of the free Wi-Fi and phone charging, whilst behaving in an antisocial manner.

Misuse of the 999 call button

Evidence from colleagues elsewhere in the country shows that there have been incidents of misuse of the 999 call button, again mainly in city centre locations. Misuse tends to be in the form of drunk people pressing the button for no particular reason, or to ask for taxis for example. This misuse of the system creates additional demand on already stretched 999 call centres, increasing the time spent waiting for real emergencies. Additionally, where BT units are proposed in areas where we do not have CCTV coverage, misuse of the 999 button may result in officers being unnecessarily dispatched to check on callers, if we are unable to verify misuse at the point of the call.

“Honey Pot” Vulnerability and pickpocketing

The provision of device charging and free Wi-Fi facilities creates an ideal location for criminal gangs to focus their attention. Pickpocketing is one of the most significant types of crime reported. The provision of charging and a Wi-Fi spot creates a honeypot effect, whereby a number of people with desirable technology such as phones and cameras may be encouraged to congregate in a small area. This provides the ideal opportunity for criminal gangs to focus their attention, where people are congregated and vulnerable due to being in a different place and may have lowered their guard because of this. The

provision of charging facilities also creates a risk that unless closely guarded, valuable possessions may be plugged in to charge, and left vulnerable to distraction/snatch theft.

Street clutter / pinch points

The proposed location of some BT Smart Hubs introduces additional pinch points, where the width of the footpath is reduced, creating spaces where an offender such as a pick pocket is provided a legitimate excuse to be within very close proximity of an offender. The height and width of the units also creates ideal hiding places, which reduce forward visibility for pedestrians. In addition, it would be impossible for someone walking towards a unit to know if an offender is hiding on the other side of it until they are directly alongside them.

Cycle theft

In addition, the proposed location of some units significantly reduces surveillance over cycle storage racks, which creates increased opportunities for cycle theft. Not only is natural surveillance compromised, but in some locations formal surveillance (Police CCTV) would also be significantly impacted. For this reason, it is imperative that all cycle parking areas are safe and attractive places to park. They must be located where they have a high level of natural surveillance, and where formal surveillance is not impeded, which acts as a deterrent to would be thieves.

Criminal damage

I have concerns that these units may be vulnerable to vandalism and criminal damage, particularly to the computer screen that facilitates phone calls, should the user get frustrated that the function has been suspended or isn't working. Should the units be damaged, it is imperative that there are mechanisms or management processes in place to ensure that this is quickly identified and repaired. Failure to do so promptly not only damages the street scene, it has been proven to perpetuate further offences around the location of the damage (Ref. Wilson and Kellings broken windows theory).

However, should this application be granted, I ask that the following condition be placed upon the approval:

This Street Hub must be managed in accordance with the BT Street Hub ASB Management Plan and must include the ongoing use of an algorithm to identify repeated anti-social number use, with a review after the first three months of installation between police and BT to assess any issues arising. Any change to the ASB management plan should be approved by the local planning authority and the Kent Police Designing Out Crime team.

This should also be for the lifetime of the device.

Reason: In the interests of good design and the creation of development where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Our comments are designed to show a clear audit trail for Designing Out Crime, Crime Prevention and Community Safety and to meet our and Local Authority statutory duties under Section 17 of the Crime and Disorder Act 1998. We welcome a discussion with the applicant/agent about site specific designing out crime. If the points above are not addressed, they can affect the development and local policing.

This information is provided by Kent Police Design Out Crime Team and refers to situational crime prevention. This advice focuses on CPTED and Community Safety regarding this specific planning application.

KCC Highways
23 July 2025

The Planning Statement (PS) states the Street Hub will be 0.45 metres from the edge of the carriageway, with the "Proposed Block Plan also showing this. No street furniture may project within 0.6 metres of the carriageway edge. Furthermore, the proposed location could result in pedestrians standing close to the

footway/carriageway edge of a road with high traffic volumes, alongside potentially distracting drivers. Consequently, the applicant is requested to relocate the Street Hub away from the carriageway edge.

[Further to the above comments, the applicant was approached to amend the proposal. Revised plans were submitted, and a further consultation was carried out with KCC Highways.]

KCC Highways
8 September 2025

I refer to the above planning application and confirm that provided the following requirements are secured by condition or planning obligation, then I would raise no objection on behalf of the local highway authority:

- The maximum value of luminance must not exceed the maximum permitted values for the relevant zone given in the Institution of Lighting Professionals 'Professional Lighting Guide 05: The Brightness of Illuminated Advertisements'. The zones and their corresponding maximum level of luminance are detailed below:

Size of Advert/Sign - Up to 10m²:

- * Zone E0 (Protected; dark) - 0 cdm-2
- * Zone E1 (Natural; intrinsically dark) – 100 cdm-2
- * Zone E2 (Rural; low district brightness) – 400 cdm-2
- * Zone E3 (Suburban; Medium district brightness) – 600 cdm-2
- * Zone E4 (Urban; High district brightness) – 600 cdm-2

All measurements are in Candelas per metre squared

- The illumination of any sign which is visible from the carriageway not to be of a flashing type.
- Rate of change of messages to be instantaneous, i.e. no fading, merging, etc.
- No moving images or sequencing of images over more than one advert.
- No message sequencing where a message is spread across more than one screen image.

The applicant should be aware that any planning permission granted by the Local Planning Authority does not constitute permission to undertake works to the highway. A separate application with KCC Streetworks will be required for the Hub installation, with further details provided in the below informative:

It is important to note that Local Planning Authority (LPA) permission does not convey any approval to carry out works on or affecting the public highway.

Any changes to or affecting the public highway in Kent require the formal agreement of the Highway Authority, Kent County Council (KCC), and it should not be assumed that this will be a given because LPA planning permission has been granted.

For this reason, anyone considering works which may affect the public highway, including any highway-owned street furniture or landscape assets such as grass, shrubs and trees, is advised to engage with KCC Highways and Transportation at an early stage in the design process.

Across the county there are pieces of land next to private homes and gardens and near the highway that do not look like roads or pavements but are actually part of the public highway.

Some of this highway land is owned by Kent County Council whilst some is owned by third party owners. Irrespective of the ownership, this land may have 'highway rights' over the topsoil.

Works on private land may also affect the public highway. These include works to cellars, to retaining walls which support the highway or land above the highway, and to balconies, signs or other structures which project over the highway. Such works also require the approval of the Highway Authority.

Kent County Council has now introduced a pre-application advice service in addition to a full formal technical approval process for new or altered highway assets, with the aim of improving future maintainability. Further details are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>

This process applies to all development works affecting the public highway other than applications for vehicle crossings, which are covered by a separate approval process. Further details on this are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/apply-for-a-dropped-kerb/dropped-kerb-contractor-information>

Once planning approval for any development has been granted by the LPA, it is the responsibility of the applicant to ensure that before development commences, all necessary highway approvals and consents have been obtained, and that the limits of the highway boundary have been clearly established, since failure to do so may result in enforcement action being taken by the Highway Authority.

The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under the relevant legislation and common law. It is therefore important for the applicant to contact KCC Highways and Transportation to progress this aspect of the works prior to commencement on site.

Further guidance for applicants, including information about how to clarify the highway boundary and links to application forms for vehicular crossings and other highway matters, may be found on Kent County Council's website:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>.

Alternatively, KCC Highways and Transportation may be contacted by telephone: 03000 418181.

Neighbouring properties

The application has been advertised on site and by individual neighbour letters to 12 properties. The overall consultation period expired on 8 August 2025.

No letters of representation have been received from neighbouring properties.

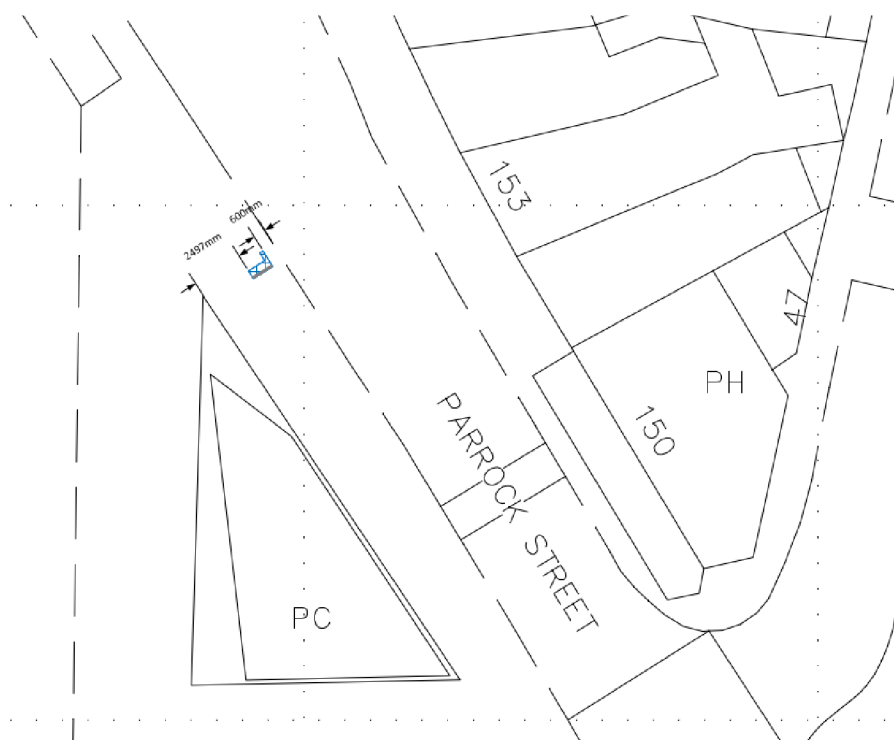
Local Ward Councillors were also consulted but no responses were received.

Officer's Analysis

Proposal

This application seeks planning and advertisement consent for a new communications Kiosk with integrated defibrillator and digital advertising display. Essentially, the proposal comprises an open plan public call box allowing for debit and credit card contactless payments, with the addition of touchscreen information to assist users with wayfinding/mapping information, as well as emergency numbers and a user's guide for operating the unit. The planning application relates to the structure of the kiosk and the advertisement consent relates to the display on the reverse of the kiosk.

The kiosk would be located adjacent to the Public Conveniences on Parrock Street, opposite No. 154:



The open design of the kiosk is to enable inclusive and open access to all users and to aid natural surveillance, in order to support designing out crime aims and a reduction in anti-social behaviour. There is internal lighting and the overhead canopy roof and side panel help users shelter from the elements. The keypad is vandal resistant and includes an armoured cord handset. The controls are located at an accessible height.

The 1635mm (h) x 924mm (w) liquid crystal display (LCD) digital display behind 9mm of toughened laminated safety glass is for advertising purposes, including public information, public health information and emergency incident messaging.

The display would portray static advertising images, changing every 10 seconds with no fading or swiping in transition. It features automated luminance control which adapts the display luminance to ambient light levels and benefits from remote diagnostics monitoring and content management systems.

A defibrillator would also be installed in the kiosk.

The application is accompanied by a Management Plan. This includes a minimum two weekly cleaning and maintenance programme.

Main Issues

The application site is in Gravesend Town Centre and has no particular constraints or designations. The proposals are therefore subject to the following planning policy considerations.

Section 12 of the NPPF 2024 relates to achieving well-designed and beautiful places and sets out the Government's requirements in relation to design issues. Paragraph 131 emphasises the importance of achieving high quality, beautiful and sustainable buildings and places. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

Paragraph 135 of the NPPF 2024 also seeks to ensure that development will add to the quality of an area, be visually attractive, and sympathetic to local character and history. Policy CS19 of the Core Strategy 2014 reflects these aims and requires that new development is well designed and respects the character and appearance of the surrounding area.

Paragraph 141 of the NPPF 2024 sets out that poorly sited and designed advertisements can have a negative impact on the quality and character of an area and that advertisements should be subject only to control in the interests of amenity and public safety, taking account of cumulative impacts.

The local interpretation of this policy approach is set out in Saved Policy TC8 of the Gravesham Local Plan 1994. This policy sets out that applications for advertisement consent will be determined with reference to the adopted SPG3 policy guidelines for advertisement control and that if displays are detrimental to public safety or to amenity, they will be resisted. In relation to the application site, which lies within the town centre, Policies 1, 7 and 8 of the Council's SPG3 apply.

Policy 1 sets out that advertisements, including illuminated advertisements, will generally be acceptable on business premises in the town centre shopping area. However, the Borough Council will wish to see that displays are well designed and attractive.

Policy 7 sets out that advertisement displays will be expected to be sympathetic to the appearance of the building or land on which they are displayed and should not be an over-intrusive feature in the street scene or locality; they should not cause or add to an impression or clutter on a building or other land.

Policy 8 sets out those advertisements should not obstruct visibility, interfere with the interpretation of road signs or traffic signals, or distract the attention of drivers.

On the basis of the above, the main issues in the determination of this application are whether it is acceptable in principle to have the kiosk with an illuminated digital advertisement at the application site, and if so whether the proposal would be appropriate in amenity and public and highway safety terms.

Appropriateness in principle

The proposed kiosk would be positioned adjacent the Public Conveniences on Parrock Street. It would be set away from the Public Conveniences building, with space between the kiosk and the carriageway edge. The appearance of the kiosk reflects that of a public telephone box but with a more modern design and would form an appropriate and unobtrusive part of the street furniture expected in such locations.

In line with SPG3 Policy 1 above, the proposed illuminated signage is acceptable and in keeping with other commercial signage in the town centre.

It is therefore considered that the principle of the kiosk and advertisement display in this location is acceptable in relation to design considerations, in line with paragraphs 135 and 141 of the NPPF 2024, Policy CS19 of the Core Strategy 2014 and saved Policy TC8 of the Local Plan 1994.

Residential Amenity

The NPPF 2024 states that planning decisions should aim to secure a high standard of amenity for all existing and future users, and where crime and disorder, and the fear of crime do not undermine the quality of life or community cohesion and resilience (paragraph 135f). The impact on amenity is also considered with regard to the criteria within Policy CS19 of the Core Strategy 2014, which states that new development should be located, designed and constructed to safeguard the amenity, including privacy, daylight and sunlight, of its occupants, and those of neighbouring properties and land; avoid adverse environmental impacts from pollution; and to minimise opportunities for crime and vandalism.

Policy 7 of SPG3 sets out that advertisement displays will be expected to be sympathetic to the appearance of the building or land on which they are displayed and should not be an over-intrusive feature in the street scene or locality; they should not cause or add to an impression or clutter on a building or other land.

The proposed kiosk and advertisement display will have a minimal impact on pollution and the amenity of any surrounding properties, due to the location of the site away from residential properties. The town centre location is an area with a plethora of street furniture and commercial signage; the proposal is in keeping with these surroundings and is not considered to provide excessive clutter in the street scene.

Kent Police have raised concerns over the opportunities for crime and anti-social behaviour (ASB) that the proposed kiosk may create, in particular relating to interference with CCTV through additional light sources; misuse of the 999 call button; provision of device charging and free wifi and calls creating an ideal location for criminals; and criminal damage.

The submitted Management Plan includes items that address many of the concerns raised, including ambient lighting, algorithms enabling the blocking of numbers, no charging facilities, and vandal resistant design features. On the basis of the content of the Management Plan, and the inclusion of a condition requiring a review of the use and management of the kiosk as recommended by Kent Police, the crime concerns are considered to be adequately dealt with.

As such, it is considered that proposed development would be in line with Policy CS19 of the Core Strategy, Saved Policy TC8 of the Local Plan 1994, the Council's adopted Advertisement Control Policy Guidelines (SPG3) and paragraphs 135 and 141 of the NPPF 2024.

Public and Highway safety

As set out in Policy 8, it is important that signage does not become a distraction for road users, which is not an issue in this case as the site is within a pedestrianised area.

This is a town centre location and provided lighting levels are conditioned not to exceed the maximum permitted values in line with the Institution of Lighting Professionals guidance, there would be no issues regarding lighting (from both an amenity and highway perspective). As the kiosk installation will be undertaken on the highway, an informative should also be added to remind the applicant to obtain the necessary KCC highway consents.

Overall, it is considered that the proposed kiosk and advertisement display would be acceptable in public and highway safety terms and would be in line with Policies CS11 and CS19 of the Core Strategy 2014, Saved Policy TC8 and T1 of the Local Plan 1994, Policy 8 of the Council's adopted Advertisement Control Policy Guidelines (SPG3) and paragraph 141 of the NPPF 2024.

Conclusion

The proposed kiosk and advertisement display would be in keeping with the type of street furniture and signage expected in this town centre area and subject to the imposition of the standard advertisement conditions, would have no adverse impacts on residential amenity or on public and highway safety.

Recommendation

Grant planning permission and advertisement consent subject to conditions.

(For detailed conditions and informatives, see draft Decision)

Case Officer:	Mrs Katherine Parkin	Team Leader:	Richard Hart
Signed:		Signed:	
Dated:	16 September 2025	Dated:	18th September 2025