

NWP Street Ltd Planning Statement

Gravesham Borough Council

New World Payphones
33 Golden Square
London
W1F 9JT

Gravesham Borough Council
Civic Centre
Windmill Street
Gravesend
Kent
DA12 1AU

30 June 2025

Town and Country Planning Act 1990

Town and Country Planning (Control of Advertisements) (England) Regulations 2007

RE: Installation of a Network of Communication Kiosks within Gravesham Borough Council

Application Address:

Site 1: CK0134 – Land outside 30 New Road, Gravesend, DA11 0AA

Site 2: CK0135 – Land outside 154 Parrock Street, Gravesend, DA12 1ER

Dear Sir/Madam,

Please find enclosed details of two Communication Kiosk applications within Gravesham Borough Council. The dual applications are submitted under the provisions of Regulation 62 of the Town and Country Planning Act 1990 and Regulation 9 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 for planning permission and advertisement consent, respectively. The right to install, operate and maintain communication apparatus is granted through section 106 of the Communication Act 2003, due to New World Payphones (NWP Street Ltd) rights as a Code Systems Operator.

The functionality of public communications kiosks has evolved to include greater service flexibility, with the proposed new communications Kiosk featuring various public communications functions including advertising. Therefore, this statement accompanies related applications for Planning Permission and Advertisement Consent objected with achieving a small network of new communication Kiosks across the Gravesham Borough Council.

The complementary legislation notwithstanding, the proposal - the new communications Kiosk with public communications functions including advertising - comprises a single scheme. Absent any part thereof (the new communications Kiosk or advertising display) it cannot come forward. Accordingly, the proposal should be considered as a single scheme.

Introduction

The application letter provides an overview of the joint planning permission and advertisement consent applications for the installation of Communication Kiosks within Gravesham Borough Council. Each site has been considered due to the aims of providing a base level coverage of accessible communication facilities across towns and cities across the United Kingdom, balanced with planning merits and local policy. The planning permission relates to the structure of the kiosk while the advertisement consent relates to the display on the reverse of the kiosk. The application documents contained for each site include a location plan and site plan specifying the position of the proposed kiosk, elevation drawings providing detailed measurements of the kiosk. A further supporting document detailing the kiosk specification and public benefit of the proposed installation is also included.

Need for Public Payphones

Public call boxes can provide a safety net for people without access to a landline or working mobile phone. In areas with poor mobile coverage, a public call box can be the only option for making calls, including to the emergency services. Telephone kiosks continue to provide a necessary public service, as recognised by the regulator Ofcom; “For those without access to a landline or working mobile, or in areas with poor mobile coverage, a public call box can be the only option for making calls to friends and family, helplines and, crucially, emergency services” (Ofcom). Around 2.68 million people in the UK, and around 560,000 people in metropolitan London do not own a mobile phone. For people without a mobile, or for those in areas with poor mobile coverage, these can be a lifeline for making calls to friends and family, helpline services and accessing emergency services. Almost 150,000 calls were made to emergency services from phone boxes in the year to May 2020, while 25,000 calls were made to Childline and 20,000 to Samaritans. At the same time, the services people need from public call boxes are changing. NWP plans to

reflect these changes, upgrading and adapting the communication kiosk to allow a base level coverage provision across urban areas fit for the 21st century.

Overview of NWP Street Ltd

Introduction & Benefits

New World Payphones (NWP Street Ltd) is modernising its telephone kiosk estate across the United Kingdom. The traditional kiosk is in need of updating to reflect the modern society that we live in. NWP recognise legacy kiosks have historic problems including lack of access for wheelchair users, problems with calling cards, and often attract the use of anti-social behaviour.

NWP have chosen a new modern design, reflecting the instantly recognisable telephone kiosk heritage, ensuring it provides open access for all. It is a robust construction made of stainless steel which will aid reduction of vandalism and assist with ease of maintenance. As a responsible telephone operator NWP will also operate a high standard of cleaning on the new estate.

The kiosks will now be a multi-communication hub for the future. Telephony is still a key provision; it is an important lifeline for many people even with the proliferation of mobile phone use. Our kiosks are regularly used to report emergencies and are used by the vulnerable: 999, 111, Childline, Samaritans and Shelter are all examples of where service provision remains vital, along with the normal use of the general public.

The kiosk will also offer the additional benefit of touchscreen information to assist users with wayfinding / mapping information. The telephone itself will allow for debit & credit card and contactless payments. To provide additional connectivity, small cell access nodes will be available in kiosks where they are able to be housed. Other location-based information may be included including NFC and Bluetooth, with ability to modernise provisions with the most up to date generation technology as it progresses.

As part of legacy kiosks across the United Kingdom, traditionally, vinyl advertising has adorned one side of the kiosk glazing. This will not be implemented in this proposal, rather the new kiosk design will integrate a digital screen to the reverse of the structure, smartening its image. The overall area of the screen is smaller than other advertising formats currently found on street furniture.

NWP have also partnered with Trees for Cities as part of our environmental commitment. When installing a kiosk, we will offer the opportunity to provide a tree for planting in discussion with the local authority.

Overview of NWP Communication Kiosk

The proposed NWP communication kiosk is ergonomic, well-designed, and strongly built with specially designed components and durable and easily cleaned surfaces. The kiosks are therefore long lasting and suitable for being situated within urban environments where these standards are usually higher due to increased usage and demand. To support this, every two weeks the kiosks are washed and maintained, at no cost to the Council, to ensure the accessibility and presentation are maintained for the lifetime of the unit.

Design – Heritage and Inclusive

Through a careful and thorough process, the communication kiosk has been designed to create an instantly recognisable yet modern structure to be installed within the streetscape. The style is instantly recognisable to its utility and a telephony kiosk, presenting an identifiable element of street furniture for locals and visitors alike across the United Kingdom. The kiosk has combined a traditional approach to the design, drawing from an appropriate influence from Britain's design heritage, coupled with a modern telephony provision to serve the public with a communication utility.



The communications Kiosk is purposefully 'open plan' to enable an inclusive and open access to all users, including those with mobility impairments. Further, the exposed nature of the proposed kiosk supports natural surveillance due to eradicating the enclosed space and removing the doors. Therefore, the kiosk inherently supports design out crime aims and the reduction in anti-social behaviour linked with these types of facilities. The internal lighting provides the necessary illumination for the operation of the telephony unit and a well-lit, secure space for users. The overhead canopy roof and glazed side panel provide those operating the kiosk with shelter from the elements and shielding from road noise alongside. The communications Kiosk complies with the latest Inclusivity standards for public telephone kiosks, contained in British Standards BS8300-1:2018 and BS-2:2018.

Touchscreen

As a key element of the kiosk, an interactive touchscreen is included on the operational side of the unit. The interactive LCD screen will display useful information, including wayfinding maps with relevant points of interest, emergency numbers and a user's guide for operating the unit.

This offering will not only enhance the benefits for locals and visitors, but also nearby businesses and facilities to direct pedestrians to their services. There is a further accessibility options whereby when switched on this moves the interactive buttons lower on the screen for easier access. This increases the tangible benefit the kiosk can provide to the community it serves.



Key Interactive options include -

- Local Area Map with POIs
- Basic map showing current location & 5, 10 and 15 min walk radius lines and Points of Interest. The Points of Interest are gathered from Google's API based on our pre-approved categories.
- Points Of Interest (POI) (information card)
- An information card shown when a POI is selected on the map or in the list. It presents more details on the POI, e.g. street address, opening hours, contact information and

about text. It also has a QR-code that can be scanned by the user with their own mobile device to get turn-by-turn directions shown on their mobile device.

- Emergency Numbers (button open separate page)
- As well as the usual Police/Fire/Ambulance numbers for Samaritans, Rape Crisis Centre, Childline, International Embassy numbers etc. are also included.
- How To Use The Phone (button open separate page)
- Includes call costs, payment methods and current kiosk address.

Touchscreen

The integral element of the communication kiosk is the telephony unit. The public telephony equipment accepts card payments and includes free calls to emergency numbers and designated charities. The alphanumeric keypad is vandal resistant to ensure the unit can last the excesses of the urban environ-



ment, including an armoured cord handset with internal steel lanyard and inductive coupling for users wearing hearing aids. The telephone controls are located at an accessible height for disabled users (max. height 1060mm), in accordance with British Standards BS8300-1:2018 and BS-2:2018. Throughout the lifetime of the equipment, there is the capability of running remote diagnostics and monitoring.

Display – British-Made

Reflecting changing user needs and technological and market developments, the new communications Kiosk operates as a multi-functional unit. As one side provides the telephony and touchscreen, the reverse includes a 1635mm H x 924mm W Liquid Crystal Display (LCD) digital display behind 9mm of toughened laminated safety glass, in accordance with British Standards. The screen is for advertising purposes, including public information, public health information, and emergency incident messaging.

Our distinctive kiosk screens are manufactured in the UK by Amscreen at their factory in the north of England. With a network of more than 12,000 screens and over 20 years' experience, Amscreen are an established global leader in the sector. Amscreen ensure that our kiosks combine cutting-edge technology with elegant, functional design that's always fit for purpose.

The Digital display is primarily for advertising purposes, however, has the provision to be open for not-for-profit communications (e.g. public service alerts, local Elections, public health messaging) at no cost to the Council, and emergency incident messaging. The display would also be made available to local businesses/enterprises at a discounted rate, to contribute towards the vitality and viability of the local area. Via the advertising display, the communications Kiosk will contribute to Business Rates and thereby towards Local Authority services delivery.

As per established norms within the advertising sector, the display would portray static advertising images, changing every 10 seconds, with no fading or swiping in transition. The display features automated luminance control, which adapts the display luminance to ambient light levels, in line with the most recent Institute of Lighting Professionals Guidance. To ensure ongoing maintenance, the screen benefits from comprehensive remote diagnostics monitoring system (RDM) and secure remote Content Management System (CMS).

Management Plan

The application is accompanied by a Management Plan for the proposed new communications Kiosks. Prepared in 2022 and updated in 2024 following liaison with Metropolitan Police Design Out Crime Officers, it details the Maintenance strategy comprising weekly inspection, cleaning and maintenance, and measures to avoid misuse or antisocial behaviour.

Community Messaging

In addition to the foregoing, the proposals include granting the not-for-profit use of the advertising display within the proposed new communications Kiosks for their own communications, for example, local service announcements, Election support campaigns, public health messaging, and so on, at no cost to the Council. In addition, the displays would be available for emergency incident messaging.

Small Cells

The communication kiosks can be equipped with built-in small cell connectivity, enhancing 4G mobile signal for residents and visitors in the area.

Small cell technology, provided by any infrastructure-as-a-service provider, can be installed wherever there is a NWP kiosk and a need to boost network capacity in the vicinity. By integrating this technology into communication kiosks, the network capacity can be increased without cluttering the streets with additional infrastructure. These outdoor small cells immediately enhance access to top speeds and capacity, making it easier for people to stay connected.

This innovative approach not only improves connectivity but also utilises existing street assets effectively. As the demand for connectivity infrastructure continues to grow, communication kiosks offer an appropriate option for network operators seeking to strengthen their networks.

International Commission on Non-Ionizing Radiation Protection (ICNIRP)

Radiofrequency electromagnetic fields (EMFs) are used to enable a number of modern devices, including mobile telecommunications infrastructure and phones, Wi-Fi, and Bluetooth. The requirements for the radio frequency (RF) public exposure guidelines are set out in the International Commission on Non-Ionizing Radiation Protection (ICNIRP) and the EU Council recommendation of 12 July 1999 (Ref: 1999/519/EC). The proposed communication kiosk equipment and installation, as detailed in the attached documentation, is designed to be in full compliance with the requirements on the limitation of exposure of the general public to electromagnetic fields (0 Hz to 300 GHz)” in all areas legitimately accessible to the public.

A Declaration of Conformity with Public RF Exposure Guidelines (formerly known as “ICNIRP Declaration”) is available upon request.

Trees for Cities

Every day an average of 58 street trees are being removed from streets across Britain. Around 150,000 street trees have disappeared from streets since 2010, despite the fact that people benefit from, and care about the trees in their communities, with cam-



paigns and action groups rising up all over the country to call a halt. With 80% of the population living in towns or cities, many people now breathe dirty air, are at risk of flooding and are struggling with rising temperatures worsened by the urban heat island effect. Without urban trees, physical and mental health are all affected, and connection with nature becomes lost.

The applicant is working alongside Trees for Cities to plant new street trees across the UK. The most important part of planting a new tree is making sure it is looked after properly. Trees for Cities care for the new trees forever. In partnership, the applicant and Trees for Cities have been planting the new street trees since October 2016 and are already seeing the benefits that they are bringing to communities in need. For every phone kiosk we install, we plant a tree on an urban street.

To achieve this, the applicant works in partnership with Trees for Cities, a charity dedicated to creating greener cities. The charity's focus is on planting trees and greening community spaces, trees to help clean the air and turn bare urban streets into friendlier, more pleasant places to be.

Defibrillator

There are more than 30,000 out-of-hospital cardiac arrests in the UK each year and currently less than 1 in 10 survive. Without immediate intervention with a Defibrillator, most cardiac arrests are fatal. Every minute without CPR and a Defibrillator, reduces survival chances by up to 10%.



According to Resuscitation Vol.167, Oct 2021, there is a 37.1% chance to save a life if the person is suffering from cardiac arrest and is within a 100m radius of the defibrillator, a 22% chance to save a life if the person is within a 200m radius of the defibrillator and a 12.8% chance of survival if the person is within a 300m radius of a defibrillator. In terms of time, survival rate was 35.2% for people receiving AEDs within 5 min, 36.6% between 5 min to 10 min, and 28.4% for longer than 10 min.

A Defibrillator is used to give an electric shock to restart a patient's heart when they are in cardiac arrest. Its purpose is to restart the heart pending the arrival of the emergency services. Therefore, in the event of someone having a cardiac arrest, the order of events is to:

- Call 999;
- Start chest compressions; and
- Locate a Defibrillator

NWP is partnered with a charity working to support communities in the provision of Defibrillators. Once installed, the Defibrillator would be registered on the national defibrillator network, known as The Circuit – the national defibrillator network, thereby ensuring its precise location is known to ambulance services.

Endorsement of NWP Communications Kiosks

The proposed communications kiosks represent a fundamental improvement to the kiosk, both in amenity terms but also in its functionality. This has been referenced in several decisions across the United Kingdom which are similar proposals. In Hillingdon, one Inspector stated:

“the existing phone box, which would be replaced as part of the proposed advertisement, is a tired looking feature...the new kiosk would introduce a more appropriate, modern feature and in this respect, it would improve visual amenity” (PINS Ref: APP/R5510/Z/16/3157043).

Similar decisions in the London Boroughs, where Inspectors have commented favourably on the design and integration of the kiosks with the street scene further support this view. In the Royal Borough of Kensington and Chelsea, where 19 new kiosks were permitted, one Inspector considered that the project:

“the replacement of the unsightly kiosk with a new kiosk of more modern and open design would be an improvement to the area’s appearance. The black colour scheme would integrate visually with other forms of street furniture of a similar colour, notably the nearby equipment boxes and frame of the bus shelter on the opposite side of the road.” (PINS Ref: APP/K5600/W/17/3190377).

Further, in Middlesbrough, the Council approved a similar scheme in February 2023. In granting consent (Plan Ref: 22/0734/FUL), the local planning authority stated:

“The application is satisfactory in that the design and appearance of the proposed telephone kiosk accords with the principles of the National Planning Policy Framework (NPPF) and, where appropriate, the Council has worked with the applicant in a positive and proactive way in line with paragraphs 186-187 of the NPPF. In addition, the telephone kiosk accords with the local policy requirements (Policy CS5, CS13, REG20 & DC1 of the Council's Local Development Framework).

In particular the telephone kiosk is designed so that its appearance is complementary to the area and will not have a detrimental impact on the appearance of the street scene or any adjoining residents. The proposed telephone kiosk will not prejudice highway safety either by obscuring visibility or be of a conspicuous or prominent appearance.” (Page 4: Plan Ref: 22/0734/FUL)

NWP have been able to support national and local development objectives to the benefit of the public and the built environment. The merits of both the communication kiosk’s design and functionality are recognised across the United Kingdom.

Development Control Framework

Section 70(2) of the Town and Country Planning Act 1990 states that in dealing with applications for planning permission, the authority shall have regard to the provisions of the development plan so far as material to the application, any local finance considerations so far as material to the application, and any other material considerations. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states the determination must be made in accordance with the plan unless material considerations indicate otherwise.

The display of advertisements is subject to a lighter touch consent process within the planning system, comprising the Town and Country Planning (Control of Advertisements) (England) Regulations 2007. Under the Regulations, a Local planning authority (LPA) shall exercise its powers in the interests of amenity and public safety, taking into account (1)(a) the provisions of the development plan, so far as they are material, and (1)(b) any other relevant factors. Without prejudice to the generality of paragraph (1)(b), (a) factors relevant to amenity include the general characteristics of the locality, including the presence of any feature of historic, architectural, cultural or similar interest. Development plan policies are material insofar as they are relevant to the proposal but cannot by themselves be decisive in any determination.

Unlike the majority of advertisement proposals, the advertisement in this case is part of a free-standing communications Kiosk. Therefore, it involves various other relevant factors as provided for in the Regulations, and which the Regulations notes are without prejudice to the generality of, which an LPA shall take into account in exercising its powers.

National Policy

National Planning Policy Framework (NPPF)

The National Planning Policy Framework (NPPF) sets out the governments planning policies for England and how they should be applied. The NPPF provides a framework for local-policy makers and is a material consideration in the decision-making process, with a presumption towards sustainable development. Sustainable development is defined in the NPPF as “meeting the needs of the present without compromising the ability of future generations to meet their own need.” (Para 7). To achieve sustainable development, the NPPF states three overarching inter-dependent objectives, which should be mutual pursued. The NPPF details in Para 8 the details of each objective:

“an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure

a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and

an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.” (Para 8)

The NPPF encourages the building of a strong, competitive economy as detailed in Part 6. Planning policies should be able to create conditions where businesses can invest, expand and adapt to the ongoing challenges of commercial activities. In particular, the NPPF states “significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development” (Para 85). In addition, the importance of supporting the development of British innovation is paramount.

Part 8 of the NPPF promotes the development of healthy and safe communities through relevant planning policies. In particular, in Para 96 there is an emphasis on promoting social interaction through developing active streets which are safe and accessible, reducing the risk that crime and disorder, or the fear of crime, undermines the quality of life or community cohesion.

Specifically relevant to the development of the communication kiosks is section 10: Supporting high quality communication infrastructure. Para 118 states “Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being”. The NPPF promotes the expansion of electronic communications and the roll out of high-quality digital infrastructure which are expected to be delivered and upgraded over time. Notably, decision making at a local level should fall within planning merit only, with national policy stating -

“Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.” (Para 122)

The desire to create high quality and sustainable development and places is fundamental to the planning process. There is an emphasis in the NPPF on good design which supports creating better places for communities to live and work in. In particular Para 135 details specific steps to consider to achieve well-designed and beautiful places -

“Planning policies and decisions should ensure that developments:

(a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

(b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

(c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

(d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

(e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

(f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for 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.”

(Para 135)

Further, through the partnership with Trees for Cities, there is a tangible benefit of the communication kiosk development. For every installation of a kiosk, a tree will be planted in an appropriate area through Trees for Cities and in agreement with the Council. Trees make an important contribution to the character and quality of the urban environment which is supported by national policy aims. Through the partnership, there is a long-term maintenance plan for the newly

planted trees which shall be agreed upon through discussions with local planning authority's highways and tree officers, as supported by Para 136 of the NPPF.

As detailed, the reverse of the communication kiosk holds an integrated advertisement display. When assessing the display, the Advertisement Regulations, 2007 provide clear criteria for advertisement applications, in such that the planning merit can only be considered on visual amenity and public safety. To concur with the 2007 Regs, the NPPF states:

"The quality and character of places can suffer when advertisements are poorly sited and designed. A separate consent process within the planning system controls the display of advertisements, which should be operated in a way which is simple, efficient and effective. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts." (Para 141)

While developments would ideally be situated away from heritage assets and sensitive areas, due to the growth of urban areas there is often an unavoidable crossover in the development process. However, this does not prohibit development as long as there is a full and thorough consideration process. The NPPF requires a description of the heritage asset which is proportionate to the asset's importance. For each site, the relevant historical record would be consulted, and an appropriate assessment of the development would be undertaken, in line with the requirements of Para 200. The significance of the heritage asset should be considered when assessing the effect of the proposed development and the extent to which it will be affected. Where a development will lead to less than substantial harm to the designated heritage asset, the harm should be weighed against the public benefits of the proposal (Para 208).

Planning Policy Guidance (PPG)

The use of Planning Policy Guidance helps explain how particular planning systems work within National Policy and Regulations. In particular, Advertisements and Heritage are two areas which are of key importance within this joint application.

Advertisements

Express advertisement consent is required for an application of this type, fall outside of the classes set out in Schedule 1 and Schedule 3 as described within the Advertisement Regulations 2007. All advertisements are subject to the standard conditions set out in Schedule 2 to the Regulations. These are:

no advertisement is to be displayed without the permission of the owner of the site on which they are displayed (this includes the highway authority, if the sign is to be placed on highway land);

no advertisement is to be displayed which would obscure, or hinder the interpretation of, official road, rail, waterway or aircraft signs, or otherwise make hazardous the use of these types of transport;

any advertisement must be maintained in a condition that does not impair the visual amenity of the site;

any advertisement hoarding or structure is to be kept in a condition which does not endanger the public; and

if an advertisement is required to be removed, the site must be left in a condition that does not endanger the public or impair visual amenity.

As detailed within the NPPF, Regulation 3 requires that local planning authorities control the display of advertisements in the interests of amenity and public safety, taking into account the provisions of the development plan, in so far as they are material, and any other relevant factors.

Amenity

“Amenity” is not defined exhaustively in the Town and Country Planning (Control of Advertisements) (England) Regulations 2007. It includes aural and visual amenity (regulation 2(1)) and factors relevant to amenity include the general characteristics of the locality, including the presence of any feature of historic, architectural, cultural or similar interest (regulation 3(2)(a)).

It is, however, a matter of interpretation by the local planning authority (and the Secretary of State) as it applies in any particular case. In practice, “amenity” is usually understood to mean the effect on visual and aural amenity in the immediate neighbourhood of an advertisement or site for the display of advertisements, where residents or passers-by will be aware of the advertisement.

So, in assessing amenity, the local planning authority would always consider the local characteristics of the neighbourhood: for example, if the locality where the advertisement is to be displayed has important scenic, historic, architectural or cultural features, the local planning authority would consider whether it is in scale and in keeping with these features.

This might mean that a large poster-hoarding would be refused where it would dominate a group of listed buildings, but would be permitted in an industrial or commercial area of a major city (where there are large buildings and main highways) where the advertisement would not adversely affect the visual amenity of the neighbourhood of the site.

Public Safety

All advertisements are intended to attract attention but proposed advertisements at points where drivers need to take more care are more likely to affect public safety. For example, at junctions, roundabouts, pedestrian crossings, on the approach to a low bridge or level crossing or other places where local conditions present traffic hazards. There are less likely to be road safety problems if the advertisement is on a site within a commercial or industrial locality, if it is a shop fascia sign, name-board, trade or business sign, or a normal poster panel, and if the advertisement is not on the skyline.

Heritage

As set out in the NPPF, the assessment of the effect of a development nearby a heritage asset must be determined by its significance and the likely effect on its amenity. The PPG concurs with this assessment and supports appropriate development.

Importantly, the term significance is paramount in assessment. The guidance identifies “‘Significance’ in terms of heritage-related planning policy is defined in the Glossary of the National Planning Policy Framework as the value of a heritage asset to this and future generations because of its heritage interest. Significance derives not only from a heritage asset’s physical presence, but also from its setting.

As further detailed within the guidance “Heritage assets may be affected by direct physical change or by change in their setting.” which a full assessment is required to understand its importance. This assessment must be from an early stage to support the development process.

The guidance identifies all heritage assets having a form of setting; however, the curtilage and the setting may be of varied extent. The guidance provides a broad definition, detailing best practice and stating “The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated

visual/physical considerations.” This detail can help support the identification of locations in relation to the heritage asset within the streetscape. This is important as the NPPF “makes clear, significance derives not only from a heritage asset’s physical presence, but also from its setting.”

When assessing the proposal, if any harm is identified, it must be weighed against the public benefit of the proposal. Due to the economic, social and environmental objectives of the proposal, and supporting of national and local policy, the public benefits derived from the proposal will benefit the public at large.

Streetscape Guidance

The installation of street furniture must be considered in relation to the potential effect on pedestrian flow. The installation of a new communication kiosk should advocate a coordinated approach in relation to other street furniture and pedestrian flow. Guidance has been prepared by the Department of Transport and Transport for London. The TfL documents, while understood to be London specific, includes principles and relevance for any location across urban centres across the United Kingdom.

The Department for Transport published guidance in December 2021, titled Inclusive Mobility - A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure. Within the document, the guidance states 2000mm is considered that in “normal circumstance... is the minimum that should be provided” (Para 4.2). Where possible, this is the aim for the footpath width after installation. However, if this becomes unfeasible, “a minimum width of 1500mm could be regarded as the minimum acceptable under most circumstances” (Para 4.2) which still allows an acceptable level of movement within the footpath. Finally, DoT guidance states, “the absolute minimum width should be 1000mm, but the maximum length of such a restricted space should

be 6 metres” (Para 4.2) which ensures a continued restricted is not over an excessive level of footpath.

The Transport for London guidance, published in 2022, identifies and separates the footpath into four distinct zones: Kerb zone, Furniture and planting zone, Footway clear zone, Frontage zone. Each will vary in scale and importance given the context of the environment. In particular, the Kerb zone should have a minimum clearance of 450mm from the road edge to prevent damage from vehicles overhanging the carriageway edge. The footway clear zone should be entirely free of obstructions to allow for unhindered pedestrian movement along the footway. The minimum width requirement of 2000mm as the “Preferred minimum unobstructed width” (Page 210) and can comfortably accommodate peak pedestrian demand and satisfy acceptable levels of service. However, in line with Government 2021 advice, 1500mm has been identified as the “Minimum acceptable unobstructed width” (Page 210) with 1000mm identified as the “Absolute minimum unobstructed width” (Page 210).

Further, to emphasise cooperation through the proposal, the guidance suggests “Where more telephone boxes exist than deemed necessary, or where a unit or units adversely impact on the quality and functionality of the streetscape, the highway authority should work with the operator to reach an agreement to relocate or remove the structure, while retaining adequate service coverage” (Section 11.11).

Through the considered level of assessment for the proposal, the introduction of the new communication kiosk will leave at least an acceptable minimum level of width for pedestrians in line with national and specific local guidance while ensuring a base level coverage.

UK Digital Strategy (October 2022)

The Ministerial forward to the UK Digital Strategy (UKDS) states, “Digital technology has transformed our lives and will continue to do so. The UK’s economic future, jobs, wage levels, prosperity, national security, cost of living, productivity, ability to compete globally and our geo-political standing in the world are all reliant on continued and growing success in digital technology.”

The UKDS states, “There are 4 foundational pillars upon which a vibrant, resilient and growing digital economy is built.” The first of these is a “robust digital infrastructure.” On this subject, the UKDS states, “Digital infrastructure plays a vital role in our daily lives and is the foundation of a thriving digital economy. Every part of the UK needs world-class, secure digital infrastructure that enables people to access the connectivity and services they need - where they live, work or travel.” The Government’s goal is to ensure that everyone, wherever they live or work in the UK, can access the connectivity and services they need for the ever-digitising world.

Local Policy

Within the local policy documents of the Gravesham Local Plan Core Strategy (2014), Gravesham sets out a number of ambitious but achievable aims to develop the Borough. Gravesham, like the NPPF, sets a presumption in favour of sustainable development within the Core Strategy, Policy CS01, stating “*When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework and in this Core Strategy*” (Policy CS01). The proposed development for the deployment of a communication kiosk provides a sustainable solution to an element of street furniture which is currently in situ across many urban environments across the United Kingdom in an economically, environmentally, and social manner. Policy CS19 issues the desire for developments within Gravesham to enhance their public realm.

The Policy states: *“New development will be visually attractive, fit for purpose and locally distinctive. It will conserve and enhance the character of the local built, historic and natural environment, integrate well with the surrounding local area and meet anti-crime standards”* (Policy CS19).

As described in the details above, the proposed kiosk supports these aims and objectives. Further, Policy CS12 states *“There will be no net loss of biodiversity in the Borough, and opportunities to enhance, restore, re-create and maintain habitats will be sought”* (Policy CS12). The aims of this Policy are achieved through the installation of a communication kiosk and the applicant’s partnership with Trees for Cities. Further, the proposal will be respectful to these aims through the installation of an inclusive and open plan kiosk within an open area of pavement.

Further, the proposal will be respectful to identified heritage assets within the area. This includes Listed Buildings and Conservation Areas as set out in Policy CS20 which states: *“The Council will accord a high priority towards the preservation, protection and enhancement of its heritage and historic environment as a non-renewable resource, central to the regeneration of the area and the reinforcement of sense of place”* (Policy CS20). As an integral part of the Communication Kiosk, the advertisement display on the reverse of the kiosk is required to be assessed on its own merits. Saved Policy TC8 of the Gravesham Local Plan First Review (1994) - Saved Policies details Gravesham’s approach to the application, setting out: *“All applications for advertisement consent will be examined in the light of the Borough Council’s adopted policy guidelines for advertisement control and displays which are detrimental to public safety or to amenity will be resisted”* (Saved Policy TC8).

While one frontage of the Communication Kiosk would contain an advertisement display, the primary use of the kiosk is for telecommunication purposes. The open and inclusive design will ensure the communication equipment is accessible to all, and the style of the kiosk ensures the use is clear and legible to any passer-by. While some effect maybe perceived within or nearby a

heritage asset, the kiosk will provide a level of enhancement through its design and public benefits to support its approval.

The installation of the Communication Kiosks across Gravesham Borough Council supports the need for appropriate telecommunication equipment. Through the overall provision as set out across the Borough, the guidance as detailed in Policy CS10 will be met. Specifically, the Council's aims to ensure *"Support will be given to proposals and activities that protect, retain or enhance existing physical and social infrastructure, or lead to the provision of additional infrastructure that improves community well-being"* (Policy CS10)

The installation of the communication kiosk will provide a necessary and desirable public benefit, which holistically achieves the Councils development goals.

Borough Strategy

New World Payphones (NWP Street Ltd) proposes to install a relatively small communication kiosk estate across Gravesham Borough Council which is fully considered as in line with National and Local aims. The two proposed communication Kiosks are set within the busy urban centres where the need for communication infrastructure has an increased requirement. Therefore, holistically, the telecommunication provision will support the need for a base level coverage across Gravesham, in particular the busier urban centres while respecting the overall character and heritage assets. As a result of the thorough development proposal, the residents and visitors to Gravesham will be able to benefit from the new communication kiosks and public benefit.

Site Assessments

Site 1 – CK0134 – 30 New Road, Gravesend, DA11 0AA

The proposed application site is located to towards the centre of Gravesend, the main conurbation of Gravesham Borough Council. New Road is a main shopping high street within Gravesend, with a main commercial and retail emphasis. The ground floor properties all have an active frontage, with numerous colours and branding at pedestrian level. The pavement is wide, with a relatively coordinated line of street furniture either side of the central access road.

The installation of a communication kiosk will support the telephony coverage of the area within a structure of high build quality and heritage design. The proposed communication kiosk will ensure a base level coverage of telephony provision within an accessible and inclusive kiosk while including additional public benefit of the touchscreen. The proposed communication kiosk will sit within an area of retail context and have a limited effect on pedestrian flow. If any harm is perceived, the public benefit of the proposed communication kiosk, as described above, would support this application.

The local area has an overly commercial context, with continuous ground floor commercial frontages along the high street. The style and finish are mixed with numerous awnings and signs extending from the building line. This is typical of many high street locations across the United Kingdom, with many chain stores within the vicinity. The adjacent buildings are neutral in contribution to the environment, neither adding nor detracting from the local character. On the opposite side of the high street, the style and finish are also neutral, with a large supermarket store within a unique building design. The area does not lie within a Conservation Area, nor does the proposed communication kiosk affect the curtilage or setting of a Listed Building. Accordingly, a Heritage Statement is not required for this site. The proposed communication kiosk with its traditional design and high build quality will reflect and enhance the identified local character.

The proposed communication kiosk is within a mainly pedestrian environment in line with other elements of street furniture. The pavement width is wide enough so the installation will not affect pedestrian flow or likely desire lines. It is identified the access road within the middle of the high street. As such, the proposed communication kiosk is set back from this access way in line with DfT guidelines. The integrated advertisement display will be subject to the below conditions to ensure continued operational management. Therefore, the proposal will not create public safety conflict with National or Local aims.

Site 2 – CK0135 – 154 Parrock Street, Gravesend, DA12 1ER

The proposed application site is located to the south-east of Gravesend, a main conurbation of Gravesham Borough Council. The proposed communication kiosk will be installed to the reverse of a public accessible toilet by the side of a large car park. On the other side of the road, there is a public house and a small shopping parade with retail outlets at ground floor level. These ground floor properties have an active frontage and their own design finishes for individual outlets.

The installation of a communication kiosk will support the telephony coverage of the area within a structure of high build quality and heritage design. The proposed communication kiosk will ensure a base level coverage of telephony provision within an accessible and inclusive kiosk while including additional public benefit of the touchscreen. The proposed communication kiosk will sit within an area mixed in context and have a limited effect on pedestrian flow. If any harm is perceived, the public benefit of the proposed communication kiosk, as described above, would support this application.

The local area has a relatively mixed context with a large car park on one side of the street and a mixed used row of properties on the other. The mixed use properties are generally two or three stories high with retail found at ground floor level. The style and finish are mixed, with a functional toilet building found at the corner of the car park and a generally positive public house building found at the end of the small shopping parade. The retail properties are generally sympathetic

to the street scape, with a mix of properties uses and frontage at ground floor level. The area does not lie within a Conservation Area, nor does the proposed communication kiosk affect the curtilage or setting of a Listed Building. Accordingly, a Heritage Statement is not required for this site. The proposed communication kiosk with its traditional design and high build quality will reflect and enhance the identified local character.

The proposed communication kiosk is relatively near an identified crossing point. However, given the long-range visibility of the communication kiosk and the kiosk being set back from the road edge an appropriate distance, there should be a limited effect on pedestrian safety. The pavement width is wide enough so the installation will not affect pedestrian flow or likely desire lines. The integrated advertisement display will be subject to the below conditions to ensure continued operational management. Therefore, the proposal will not create public safety conflict with National or Local aims.

Suggested Conditions

In order to ensure the ongoing compliance with the agreed operation and to alleviate any perceived visual amenity and public safety concerns of the advertisement display, the below conditions have been suggested to be included as part of the decision notice. These are in line with the six tests for conditions according to the NPPF. The standard conditions, as detailed in Schedule 2 of the Advertisement Regulations, 2007, are to be contained within any advertisement consent approval.

1 - That the display of the advertisement (s) shall be permitted for a period of five years from the date of this decision.

2 – The Standard Conditions (Schedule 2, Regulation 2(1))

2.1. No advertisement is to be displayed without the permission of the owner of the site or any other person with an interest in the site entitled to grant permission.

2.2. No advertisement shall be sited or displayed so as to—

(a) endanger persons using any highway, railway, waterway, dock, harbour or aerodrome (civil or military);

(b) obscure, or hinder the ready interpretation of, any traffic sign, railway signal or aid to navigation by water or air; or

(c) hinder the operation of any device used for the purpose of security or surveillance or for measuring the speed of any vehicle.

2.3. Any advertisement displayed, and any site used for the display of advertisements, shall be maintained in a condition that does not impair the visual amenity of the site.

2.4. Any structure or hoarding erected or used principally for the purpose of displaying advertisements shall be maintained in a condition that does not endanger the public.

2.5. Where an advertisement is required under these Regulations to be removed, the site shall be left in a condition that does not endanger the public or impair visual amenity.

Reason: The conditions are imposed by virtue of the Regulation 2(1) of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

3 - There shall be no moving images, animation, video or full motion images displayed unless otherwise permitted by this consent.

Reason: In the interests of amenity and in order to retain effective planning control.

4 - In the hours of darkness, the advertisement display luminance shall be no greater than 300cd/m² in accordance with the recommended maximum night-time luminance value set out in Table 10.4 within the Institution of Lighting Professionals - Professional Lighting Guide (PLG 05) 'Brightness of Illuminated Advertisements including Digital Displays' (or its equivalent in a replacement guide) in cd/m².

Reason: In the interests of amenity, public safety and in order to retain effective planning control

5 - In daylight hours, the advertisement display luminance shall be controlled in order to reflect ambient light conditions (to ensure it is neither too bright or too dull), and shall at all times be no greater than the recommended maximum daytime luminance values set out in Table 10.5 within the Institution of Lighting Professionals - Professional Lighting Guide (PLG 05) 'Brightness of Illuminated Advertisements including Digital Displays' (or its equivalent in a replacement guide) in cd/m².

Reason: In the interests of amenity, public safety and in order to retain effective planning control.

6 - Unless otherwise permitted, the minimum display time for each advertisement shall be 10 seconds and the advertisement shall not include any features which would result in interactive messages / advertisements being displayed.

Reason: In the interests of amenity, public safety and in order to retain effective planning control.

7 - The interval between successive advertisements shall be no greater than 1 second and the complete display shall change without effect. The display to include a mechanism to default to a blank or black screen in the event of malfunction, or if the advertisement is not in use.

Reason: In the interests of amenity, public safety and in order to retain effective planning control

Conclusion

The joint application for planning permission and advertisement consent for the installation of communication kiosks within Gravesham Borough Council will provide significant public benefit. The kiosks will be constructed with durable materials while touching upon the design heritage of Britain to provide a useful and attractive element of street furniture. The public benefit of providing telecommunication with a base level coverage enhances the streetscape and living and working environment. The provision of accessible telecommunications is incredibly important for all, but especially the most vulnerable, especially in urban areas where access to services can be limited.

Through the provision of the communication kiosks, the applicant, in partnership with Trees for Cities, believes the proposal supports policies set out at National and Local level in creating a sustainable development, through economic, social, and environmental benefits, which will enhance the local area.

I trust the above planning statement and enclosed documentation clearly illustrate the details of the proposal. If any more details are required, please do not hesitate to contact me on the details below.