

Appeal against the Wokingham Borough Council's refusal of Full Planning and Consent to Display Advertisements

Appeal Site:

Pavement o/s Poundstretcher, 25 Peach Street, Wokingham RG40 1XJ (E 481353, N 168603)

Our BT Street Hub Ref:

WKM-001

Council LPA Ref(s):

252518 - Appeal A

252519 - Appeal B

Proposal:

Removal of the existing BT payphones and the installation of a freestanding BT Street Hub providing free ultrafast Wi-Fi and other community services and with excess space returned to the community.

Associated BT Public Kiosk Removals:

Pavement o/s Poundstretcher, 25 Peach Street, Wokingham RG40 1XJ (E 481343, N 168596)

Appendix

Appendix A – Application submission

Appendix B – Planning and design drawings

Appendix C – Full Planning Application Decision Notice

Appendix C – Full Planning Application Officers' Report

Appendix C – Advertisement Application Decision Notice

Appendix C – Advertisement Application Officers' Report

Appendix D - Review of the Universal Service Obligation

Appendix E - Inclusive Mobility - A Guide to Best Practice

Appendix F – Existing KX100+ kiosk Elevation drawings with dimensions

Appendix G – Appeal Decision 3369080 & 3369081 Parsonage Road, Dursley

Appendix H - Appeal Decision 3308266 and 3308267 London Road, Headington, Oxford



Image 1 – Existing Streetscene (Google Streetview August 2023)



Image 2 – Photomontage illustrating Proposed Streetscene (Image taken at survey June 2025)

Introduction

For the avoidance of background repetition, so far as is practicable in this appeal statement, the appointed Inspector is respectfully asked to refer to the documents submitted as part of the full planning permission and advertisement consent submission.

The proposed development is a freestanding Street Hub unit that forms an integral part of a new network across Wokingham, based on upgrading the existing BT estate of public call boxes. The Street Hub network will provide the residents and visiting populations with an unprecedented suite of essential urban tools, including free ultrafast Wi-Fi, phone calls, wayfinding, device charging, an emergency 999 call button, public messaging capabilities, and a platform for interactive technologies on the streets such as air quality monitoring.

This appeal proposal is part of a wider rollout of Street Hub units across Wokingham and will bring forward significant social, economic and technological benefits to the public. Street Hubs seek to upgrade their existing BT estate, by associating one kiosk removal for every one new unit, in which the fallback position is the retention of the existing payphone infrastructure.

An application for planning permission was submitted to the Council on 14th October 2025 (Appendix A and B) and was refused on 01st December 2025 (Appendix C).

The Positive Case for Street Hub

This statement will outline in greater detail how the proposal is in accordance with National and Local Plan policies, guidance and the public benefits of the Street Hub proposal. We have outlined in detail the tangible benefits, but we would go further by highlighting how this proposal and the overall strategy will help deliver the goals of the Local Plan and Digital Strategy.

It is important to note from the outset that this appeal forms part of an overarching project to remove and replace some of the existing BT kiosks in Wokingham that will improve the public realm by upgrading them with the modern Street Hub. The existing payphone kiosks in the town that are each reaching the end of their optimum functional state and as noted above, the Street Hub is next phase of rolling replacement that has been ongoing for over 100 years.

This appeal considers that it is of the utmost importance to highlight that BT has an Electronic Communications Code license and Universal Service Obligation (USO) governed by Ofcom to provide and maintain publicly accessible call boxes on the street, irrespective of whether or not there is a perception that they are used or not. We would refer to the links below, which outline BT's license obligations in terms of the USO (Appendix D).

Whereas 30 years ago, BT's public obligation was to provide access to universal communications by the means of a landline telephone. In 2025, the nature of telecommunications has changed and the public service is Wi-Fi, free telephone calls and the other functions that the Street Hub will provide. We consider that BT's agreement with Ofcom addresses this issue, as the proposal is to replace existing BT kiosks and that the proposal should not be considered as a positive development on that basis. However, it is important to state that each existing kiosks are not being individually replaced and each proposal has been made in a measured way that provides the optimum service and does so in the sensitive manner possible.

Whilst it is acknowledged that the proposed Street Hub may have some minor negative impacts, it is the appellant's considered opinion from an objective perspective, that these impacts are outweighed by the significant benefits provided by the proposed unit. This appeal statement will provide a comparative assessment of the positive benefits and negative impacts associated with the development to reinforce our view that this proposal should be supported and the appeal should be allowed.

National Planning Policy Framework 2024

2. Achieving sustainable development

Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

a) 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;

b) 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

c) 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.

It is considered that the existing payphone kiosks, which the proposed Street Hub will replace, will provide valuable services such as free Wi-Fi, which the general public increasingly expects and therefore contributes to the needs of the community. The presence of the existing kiosk acts as a precedent for a public service at this location and will not compromise the identity of the area.

The Street Hub project seeks to justify the proposed development by removing the of existing BT telephone kiosks that are no longer fit for purpose and do not provide a public service that supports their continued presence in the public realm. The Street Hub provides a host of free services compared to the existing kiosks that only offer a service for voice calls that require payment. Therefore, the proposal represents a significant improvement to the efficiency of the use of public space with an improved public service. The service of calls that require payment clearly no longer provides a tangible benefit to the community, so the proposed kiosk will contribute to meeting the future needs of the community.

In terms of the contribution to economic success of the centre of Wokingham, which is an important tenet of sustainability, whilst the services offered do not directly attract visitors to the area, they will improve the experience by helping to project a positive experience that will inevitably lead to return visits. The benefits will be available to the local community and to visitors, with wayfinding services that will support the retail sector and tourism, which in turn leads to visitors returning to the area and further investment to the area.

Street Hubs connect their communities to the fastest and most robust free public Wi-Fi service in the UK, 1Gbps within 150m. Full fibre connectivity enables speeds up to 13.9 times faster than standard fixed line home broadband and can handle large numbers of connected users without any reduction in speed.

An omnidirectional outdoor Wi-Fi access point at the top of each Street Hub is connected directly to the fibre broadband network, with co-channel interference mitigated by directing Wi-Fi signals away from neighbouring access points. Our full fibre solution allows capacity upgrades by orders of magnitude (e.g. 1Gbps to 10Gbps) without street works. This will provide a social service to the local area and residents who may not have access to broadband in an inclusive and non-exclusionary way, which will contribute to economic success and reduce isolation in the area. The proposed Street Hub will therefore provide an important economic and social benefit outlined in the Product Statement that accompanies the application.

The proposed development supports the aims of the environmental facet of sustainable development by being powered by 100% renewable, carbon-free energy. In addition, the Street Hub kiosk supports the reduction in the use of private car and increase the use of public transport, cycling and walking through its touch screen wayfinding services that are supported by Government advice. Inclusive Mobility: A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure (Appendix E) states on Chapter 12 as follows;

'Digitally provided information and communications technology (ICT) is increasingly enhancing the accessibility of public transport infrastructure and the pedestrian environment. This section focuses on ICT commonly used in public transport: touchscreens, contactless ticketing, real-time information and wayfinding technologies. ICT has the potential to greatly improve and enhance the journey experience for public transport users. This includes supporting wayfinding, supporting intra-station navigation, and providing passengers with accessibility data about stations and stops so they can make informed travel choices regarding accessibility of services.'

8. Promoting healthy and safe communities

Paragraph 96 states, *'Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:*

- promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages.*
- enable and support healthy lives, through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.'*

One of the key characteristics of the Street Hub design is that the services are available to all members of the public, in a manner that the existing KX100 kiosks are not. The existing kiosks restrict access to disabled people with mobility issues, due to the needs to open a door and the Street Hubs open access resolves this issue. For obvious reasons, services are not available to those with sight or hearing impairments, which the Street Hub will resolve. As outlined above, the secure high-speed Wi-Fi means that those without access to internet services can benefit from the free unrestricted access provided by the Street Hub

10. Supporting high-quality communications

Paragraph 119 of the NPPF stipulates that *'Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections.'* As one of the primary purposes of the proposal, this is provided by the Street Hub unit and clearly contributes to the achievement of the policy.

Paragraph 120 goes further by stating the *'Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate.'* The design of the proposal as an advertising column, similar to well-established street furniture such as advertisements built into bus shelters, provides WiFi capability but also crucially small cell coverage and capacity for 5G services. All of this is camouflaged within the unit, contributing to the extension of the 5G network which undoubtedly becomes a contentious issue in the near future.

Furthermore, the rollout of the 5G network is continuing at apace and the constant issue of providing effective coverage to areas such as the above is a constant source of frustration for all parties concerned. The under-appreciated benefit of the Street Hub is that it offers the area small cell 5G coverage with inbuilt equipment, in a manner that does not impact the integrity or visual amenity of the heritage asset in the same way as traditional installations.

12. Achieving well-designed places

Paragraph 131 states *'The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. 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.'* The proposed Street Hub is an award-winning and well-designed feature, that aims to replace existing BT kiosks that no longer positively contribute to the aesthetic of the public realm.

Paragraph 135 (f) continues that development should *'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.'* We would highlight that the core principle of the Street Hub design is to ensure that the unit is inclusive and accessible to all, something that the existing kiosks that have been designated for and in many cases will continue to deteriorate from their optimum condition.

With specific regard to advertisements, paragraph 141 states that *'The quality and character of places can suffer when advertisements are poorly sited and designed.'* Payphone kiosks are an established means of accommodating advertising, but as the kiosk degrades in quality, so does the quality of the advertisement and its effectiveness. The Street Hub, with its digital format and the rigorous cleaning schedule that BT has undertaken to maintain, will fundamentally improve the quality of advertisement that the applicant intends to provide.

Wokingham Borough Development Plan Core Strategy (Adopted 2010)

CP1 – Sustainable development

Planning permission will be granted for development proposals that maintains or enhances the high quality of the environment;

The Street Hub project seeks to justify the proposed development by removing the existing BT telephone kiosk that are no longer fit for purpose and do not provide a public service that supports their continued presence in the public realm. The Street Hub provides a host of free services compared to the existing kiosks that only offer a service for voice calls that require payment. Therefore, the proposal represents a significant improvement to the efficiency of the use of public space with an improved public service. The service of calls that require payment clearly no longer provides a tangible benefit to the community, so the proposed kiosk will contribute to meeting the future needs of the community.

As a replacement of the existing kiosk, the proposal seeks to provide a modern and highly designed improvement to an item of street furniture that no longer provides a benefit to the area and is in a gradual state of deterioration. The choice of location was based on the immediate area being within the context of Peach Street, which is predominantly commercial and is designated in the Local Plan as a Primary Shopping Area. As such, a highly designed feature such as the Street Hub that is intended to use by visitors to the area is considered to be ideally suited to this environment.

CP3 - General Principles for development

Planning permission will be granted for proposals that:

- a) Are of an appropriate scale of activity, mass, layout, built form, height, materials and character to the area together with a high quality of design without detriment to the amenities of adjoining land users including open spaces or occupiers and their quality of life;*
- b) Provide a functional, accessible, safe, secure and adaptable scheme;*
- c) Have no detrimental impact upon important ecological, heritage, landscape (including river valleys) or geological features or water courses.*
- d) Maintain or enhance the ability of the site to support fauna and flora including protected species;*
- e) Use the full potential of the site and contribute to the support for suitable complementary facilities and uses;*
- f) Contribute to a sense of place in the buildings and spaces themselves and in the way they integrate with their surroundings (especially existing dwellings) including the use of appropriate landscaping.*

This appeal will demonstrate that the removal of the existing kiosk adjacent to the site will represent a reduction in clutter that mitigate for the introduction of a taller item of street furniture. The proposed Street Hub is a highly designed kiosk in order to provide a wide range of services that will enhance the town centre experience that is ideally suited for town centre environments. The Street Hub is designed to be functional and accessible in a manner that the existing kiosk is not, which provides a greater degree of security and safety for users of the town centre by allowing people to remain in contact or to contact services in the event of an emergency.

CP13 – Town centres and shopping

Wokingham and Woodley town centres, Lower Earley district centre, Shinfield Road centre, Twyford village centre and Winnersh centre are suitable in principle to accommodate town centre uses. The roles of all existing and new retail centres will be protected and maintained, in addition to local shopping centres and parades that meet the day to day needs of the local community. Losses of retail from primary retail frontages will not be permitted in order to maintain vitality and viability.

Adopted Managing Development Delivery Local Plan February 2014

Policy TB15: Major Town, and Small Town/ District Centre development

Planning permission will only be granted for proposals for main town centre uses within Wokingham town centre or small town/district centres where they demonstrate that:

- a) They are of a scale and form that is compatible with the retail character of the centre and its role in the hierarchy of retail centres*
- b) How it retains or increases the provision of Use Class A1 (Shops) in primary shopping frontages and the provision of Use Class A1 or A2 (Financial and professional services) or A3 (Restaurants and cafes) or A4 (Drinking establishments) or A5 hot food takeaways in secondary shopping frontages*
- c) They contribute to the provision of day and evening/night-time uses and are compatible with other uses*
- d) They enhance vitality and viability.*

As outlined above, the proposed development is considered to be a significant improvement to the existing kiosk that is to be replaced and will demonstrably improve the visitor experience within the Primary Shopping Area. The type and design of the Street Hub will safeguard the retail character and function of the area, whilst contributing to the vitality of the area with its modern, highly designed appearance. The proposal is also more accessible to all users of the public realm, meeting the needs of the local community and directly contributing to social inclusion with the services the Street Hub would provide.

In addition, it is considered that a modern and accessible development that is highly designed will provide a sense of vitality to an area of the town that the existing kiosk does not contribute to. One of the principal services that the proposal will provide is free high-speed broadband. The Street Hub Product Statement states

Street Hubs connect their communities to the fastest and most robust free public Wi-Fi service in the UK, 1Gbps within 150m. Full fibre connectivity enables speeds up to 13.9 times faster than standard fixed line home broadband and can handle large numbers of connected users without any reduction in speed.

An omnidirectional outdoor Wi-Fi access point at the top of each Street Hub is connected directly to the fibre broadband network, with co-channel interference mitigated by directing Wi-Fi signals away from neighbouring access points. Our full fibre solution allows capacity upgrades by orders of magnitude (e.g. 1Gbps to 10Gbps) without street works.

This will provide a service to local businesses and residents who may not have access to broadband in an inclusive and non-exclusionary way, which will contribute to economic success and reduce isolation in the area. The design of the Street Hub means that no further streetworks are required and the free services can be upgraded without any further works being required to the unit.

Whilst the proposal is not a traditional telecommunications mast, the proposal provides modern mobile telecommunications services, including free Wi-Fi and 5G services for the EE network. In order to provide these services, the proposal is using the existing building of the BT payphone kiosk at the appeal location, which is to be removed and the equipment is contained with the Street Hub so that it is therefore camouflaged. It is the view of the appeal that the visual impact has been minimised by the design and location.

The Policy recognises the importance of access to developing technologies by businesses and residents and its positive impact on improving lifestyle and reducing the need to travel. The proposed Street Hub, therefore, directly contributes to the success of the Local Plan aims.

LPA Ref. – 252518 (Consent for Full Planning Permission) Appeal A

Wokingham Borough Council refused full planning permission of the proposed Street Hub unit for the following reasons:

“1. Owing to its location, sitting and scale, the proposed development would result in an incongruent, oppressive and visually imposing addition to street scene. It would also fail to conserve or enhance the Wokingham Town Centre Conservation Area and the setting of several Grade II Listed Buildings. The proposed development is therefore contrary to policy CP3 of the Core Strategy (2010) and TB24 of the Managing Development Delivery Local Plan (2014), Section 66 and Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the NPPF.”

Street Hub is a modern form of development, and in many ways, its innovative design attributes reflect the technological advancements within the field of electronic communications over the course of the last decade. In order to accommodate the equipment necessary to provide the immediate and future benefits to the area as previously outlined, including the advertising feature, the unit has to be the height and design that is proposed.

The Council report states, *‘The proposed structure is presented as public telephone hub which would replace the existing BT telephone box. However, the proposed design lacks refinement of the original with the large digital screen over-dominating the suggested primary purpose of the structure. The result is that the structure performs primarily as a platform for advertising, rather than a telephone hub. The provision of the digital screen informs the necessity for an overly large structure, much larger than would be required to house the telephony, Wi-Fi and wayfinding equipment proposed.’*

In response, the size of the Street Hub unit is specifically required because the kiosk will accommodate 5G antennas and the height is necessary in order to meet the criteria for ICNIRP compliance. Whilst there will always be some degree of harm from any form of development, the positive impact that the proposal will bring to the area will outweigh the negative impact.

It is 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 and is therefore necessary. This aspect of the justification for the proposal and the project is important, as the service that the USO requires means that BT are obliged to meet this obligation with their own infrastructure. As such, if existing kiosks no longer provide a beneficial service and fall into disrepair, they must be replaced with an alternative type of kiosk that provides a universal service. In order to meet this requirement, it is obvious that new telephone kiosks are untenable, in the same way that KX100 units, for example, replaced red telephone boxes and as such, the Street Hub is the design that allows BT to provide its service in an era of advanced communications.

The Council's report states, *‘The pavement along this stretch is already heavily visually cluttered by street furniture, notwithstanding the proposed removal of the existing BT kiosk, along approx. 50m distance there are numerous telecoms and highways cabinets, a litter bin, traffic lights, a large road sign, a lamp post, bollards and a pedestrian bench. All of which result in a heavy concentration of street furniture and pedestrian obstacles.’*

Whilst it is acknowledged that the protection of the town's heritage is of paramount importance to the Council, the proposal has been situated within the Primary Shopping Area, designated in the Local Plan and the proposal would otherwise be considered to be suitable.

The Council report continues, *'At nearly 3m metres in height, the proposed unit would be a visually imposing structure. Through the monolithic form and scale, it would negatively contribute to existing street furniture. Furthermore, at over 1.2 in width, oriented perpendicularly to the highway, the unit would represent a substantive physical obstacle for users of the pavement. As such, the unit would add significantly to the street clutter in the vicinity, compounding the pre-existing situation, and further erode the appearance and visual amenity of the immediate area.'*

It is the view of this appeal that the removal of the existing kiosk will significantly reduce the amount of clutter in the immediate vicinity, which seeks to enhance the Conservation Area and at the very least maintain the setting. The height of the existing kiosk is 2.51m and the proposed Street Hub is 2.986m, which is an increase in height of 47.6cm. The Council considers that the proposed Street Hub to be a less refined design, however, the existing kiosk which is smaller in height, takes up a significantly greater amount of footpath space at the appeal location (0.894 square meters) compared to the Street Hub (0.43 square meters) and is a reduction of **46%**. There is also a difference in density, as the existing kiosk is larger (2 cubic meters) compared to the Street Hub (1.29 cubic meters), which is a reduction of **35%**. The perception that the Street Hub is bulkier and curved is therefore an inaccurate assessment.

For reference, the measurements of the proposed Street Hub are **1.236 x 0.35 x 2.986** (taken from the Site Plan) and those of each existing kiosk are **2.51 x 0.894 x 0.894m**, which can be found at the following link in Appendix F.

It is accepted that the proposal is not a direct conversion of an existing kiosk, due to the nominated removal being in a less appropriate location beside the directional traffic sign. However, the removal of the kiosk that is larger in overall size means that the proposal does not introduce an additional item of street furniture to the public realm and is a significant net reduction of clutter.

With regard to the Council's reference to the proposed Street Hub representing a substantive physical obstacle for users of the pavement, it should be noted that the distance from the inside edge to the wall is 2.67m. It is important to note that the Highways Officer has not objected to the proposal on this point and the distance of the existing kiosk to the wall is also 2.67m and as such, the conditions on the pavement will remain the same.

The reason for refusal states that the proposed Street Hub would result in an incongruent, oppressive and visually imposing addition to street scene. Whilst it is acknowledged that the proposal is a modern design, it is the view of this appeal that the existing kiosk is an accepted feature of the public realm, despite it's outdated late 80's appearance that itself does not have any connection to the heritage value of the immediate area. It is also important to note that the previous kiosk at this location was replaced between 2021 – 2023. On this theme, the Council report states;

'Whilst elements of the core have been altered/lost/remodelled, it is still read and understood as a market town. This is characterised by the irregular historic street pattern, the mixture of vernacular building types and materials, which have developed over time.'

It is therefore considered that the proposed Street Hub is an extension of this pattern and there is a strong precedent for the replacement of BT infrastructure at this location. As outlined above, it is not considered to be reasonable to expect BT to replace a kiosk with a version that provides a service that people will not use.

The Council report continues, *'The proposed kiosk is more typical of a busier metropolitan cityscape, as opposed to the relatively simple market townscape. Given this relatively simple, uncluttered character, by introducing the kiosk which has a divergent character, this would seek to erode part of the identified significance of the Conservation Area.'*

The immediate street scene provides a strong contribution to the Conservation Area, but the appeal location is located outside of Poundstretcher, which is the most prominent commercial building on Peach Street. In addition, modern flats have been built on the north side in the last 7 years and it is clear that this section of the Conservation Area has experienced a greater degree of modernisation over the course of the last 50 years and is visualised in Image 3 below. The changes have maintained the area's sense of historical importance and the replacement of the previous kiosks provides sufficient precedent to justify the view the proposal would not be divergent to the character of the area.



Image 3 – View of the appeal location looking southwesterly along Peach Street (Source: Google Streetview September 2024)

With regard to the Council's point that the proposal is unsuitable for a relatively simple market townscape, a recent decision in a similar location offers an example that the proposed Street Hub would not be detrimental to a Street Hub in a Conservation Area. In Appeal Ref: APP/C1625/W/25/3369080 (Appendix G), Inspector Edwards observed,

'The proposal would introduce a new type of structure to the street scene. Also, the unit would be taller and slightly wider than the existing booth and so it would be more prominent when looking along the walkway in either direction. Even so, the hub would not stand out as an isolated street feature given its proximity to the cluster of furniture that would be retained. Moreover, whilst different in appearance to the booth, the unit would fit in with the group of street features and the commercial nature of the locality. The removal of the telephone booth would ensure the hub avoids any significant increase in visual clutter of street furniture.'

Inspector Edwards continues, *'The modern and sleek appearance of the hub would contrast sharply with the traditional architecture of the older buildings in the town centre. However, the unit would be away from Parsonage Street and within the walkway where there is no strong sense of historic townscape. Also, the development would not spoil any views of particular visual interest and it would not detract from any notable architecture, particularly when compared to the existing telephone booth. Consequently, I find the proposal would not harm the significance of the CA.'*

In order to address the impact of the proposed Street Hub on the heritage assets within the wider area, for context, the Council report states, *'The application proposes the erection of a digital media advertisement screen formed of BT Hub with associated telephone on Peach Street, opposite Peach Plance, outside of Poundstretcher within the Wokingham Town Centre Conservation Area – a designated heritage asset. In addition to the impact upon the Conservation Area, the proposals impact upon the wider setting of nos. 45, 48-50, 52 and The Overhangs (53, 55, 55A, 57 and 59) Peach Street – all Grade II listed buildings.'*



Image 4 – View of the appeal location within the context of the heritage assets looking northeasterly along Peach Street (Source: Google Streetview September 2024)

Whilst it is noted that there are statutorily designated Listed Buildings nearby, it is important to emphasise that they are approximately 46m from the appeal location to the nearest on the north side of Peach Street and approximately 65m from those on the south side. As such, it is clear that there is sufficient distance so that their setting is relatively unaffected, with the long view (Image 4 above) remaining unaffected, given the presence of the existing kiosk and does not justify the refusal of the application.

The Council report concludes this matter by outlining that, *'In this case, the proposal, as discussed, will result harm to the Conservation Area and setting of the aforementioned listed buildings. The level of harm is considered to be less than substantial. The harm needs to be weighed against public benefits. It is acknowledged that the kiosk will provide a public facility (with the range of functions outlined earlier in this report). There is an existing public phone box in the immediate vicinity which is proposed to be replaced. It is noted that the proposal will provide some extra functions such as an interactive map and Wi-Fi which are benefits. However, it is the view of Officers that these benefits do not equal, override and outweigh the level of harm that has been identified to the heritage assets.'*

The Council's assessment is that the proposal will cause harm that is less than substantial. It is the view of this appeal that the benefits justify the proposal and the impact will be viewed as being neutral when the balance is considered. When taken in isolation, it could be argued that each feature provided by the proposed Street Hub has a limited material benefit that would justify the proposal. However, when the features are considered as a whole, such as high-speed WiFi and calls, wayfinding services and charging facilities that are free, provided within one kiosk, the justification increases exponentially.

The immediate benefits are those that are outlined above and in the product statement that accompanied the application. It is important to note that the majority of street furniture of a similar nature that is deployed throughout UK urban centres with advertising features and the existing kiosk do not offer the same array of services and for that reason, the Street Hub stands out as being exceptional.

This appeal would refer again to the significant reduction in street furniture that the proposal will achieve by removing the existing 2no kiosks, whilst exponentially increasing the level of service that is provided. The existing kiosks provide a service for making telephone calls that requires payment, yet the proposed Street Hub provides free Wi-Fi, calls, wayfinding services and device charging. There is also the improved cellular network service that will provide capacity, which will significantly improve customer service for the EE network. As such, the scale of the proposal on that basis is acceptable for a function that is clearly appropriate for a town centre location.

The use of the Street Hub to provide 5G services is an important benefit to the centre of Wokingham, which, as part of the Conservation Area, is invariably going to struggle to support the necessary infrastructure to meet the mobile telecommunications demands of the public. The antennas, which are otherwise unsightly items when installed in urban areas, will be installed within the proposed kiosk and screened from view, thereby minimising the impact whilst providing an important service. It is therefore the position of this appeal that the benefits of the proposal will outweigh the harm so that the less than substantial harm is not sufficient grounds to refuse the application.

The final point that this appeal would wish to address is the matter of Highway safety that has been raised. The Council report states, *'Concerns have been raised by the Highway Officer regarding the kiosk obscuring a directional sign and compounding the existing issue given the additional height and distance from the sign. The applicant has provided Transport for London guidance for such structures within the highway/public footpath and whilst this is helpful the concerns of the highway officer remain. Whilst the concerns remain, it is not considered at this time that the proposal would result in detrimental harms in of itself.'*

The view of this appeal is that the existing kiosk is located immediately adjacent to the directional sign and thereby blocks the clear view of the information. This is illustrated in Image 5 below and the appeal location was chosen specifically to address this issue, with the relocated site being 15m from the sign. As such, the proposal is a tangible improvement and a further justification with only a very minor impact on highway conditions as a result.



Image 5 – View of the existing kiosk and the impact on the directional sign (Source: Google Streetview August 2025)

Conclusion

The proposed Street Hub unit will not appear out of context within this busy city centre environment, nor will it represent a particularly dominant or overbearing feature given that the proposal is to replace the existing kiosk. It represents a significant improvement to the fallback position of the existing kiosks being retained, so the Street Hub is a form of development that is positively encouraged by the NPPF and the policies of the Local Plan.

It is considered that there will be limited harm to the area, in which any such harm is outweighed by the public benefits of the proposal, most notably the array of features it offers as well as securing the appeal site's optimum viable use by replacing existing public call boxes. The integrity of the Conservation Area and the removal of the existing kiosks will demonstrably improve an area of significant heritage value, whilst allowing the appellant to meet their service obligations that are required under the agreement with Ofcom.

The removal of the existing kiosks will represent a significant reduction in street furniture at the appeal location and in the area, which as a reduction in unnecessary clutter and therefore complies with policy CP3 of the Core Strategy (2010) and TB24 of the Managing Development Delivery Local Plan (2014), Section 66 and Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the NPPF. The proposal will also align with the aims of the sustainable development policies, by removing items from the public realm that no longer provide a tangible benefit and will also be operated using 100% renewable energy sources. In this respect, it is concluded that the appeal for full planning permission should be allowed.

LPA Ref. – 252519 (Consent to Display Advertisements) - Appeal B

The Wokingham Borough Council determined to refuse consent for the display of advertisements for the following reasons:

“1. The proposed digital advertising screen would introduce an advertisement that, due to its size, illumination and changing display, would be visually dominant and unduly prominent to the detriment of the streetscape and would fail to conserve or enhance the character or appearance of the Wokingham Town Centre Conservation Area and the setting of Grade II Listed Buildings. The proposal is therefore contrary to policies TB19 and TB24 of the MDD (2014).”

The reasons for refusal noted above and many of the points that support Appeal A are transferable and so to avoid repetition, please refer to those responses. The purpose of Appeal B will be to show that the advertisement and illumination do not have a *detrimental impact on the visual amenity of the area*.

As outlined in Appeal A, the purpose of the proposed Street Hub is part of an ongoing project to replace the existing BT payphone kiosk estate that no longer meets the requirements of the USO agreement with Ofcom. Whilst the advertisement screen is a prominent feature, it is considered to be a legitimate means of income to subsidise the significant improvement to the free universal service compared to the limited paid call service that an existing kiosk provides.

This appeal would refer to paragraph 141 of the National Planning Policy Framework (December 2024) as the basis for justification for the development, which 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.’*

Appeal A has outlined that the proposal is not a direct conversion of an existing kiosk, but rather, it involves the relocation of the existing BT payphone kiosk adjacent to the site and does not introduce a new item of street furniture to the area. The replacement of the existing kiosk will also be the rationale that the appeal proposal will not create an unacceptable impact on amenity or cumulative impact that would warrant the refusal of the application.

The Council report states, *‘The proposed screen would have a degrading/negative effect on the character of the conservation area and the setting of listed buildings and as such represents a poorly sited location. It would introduce an advertisement that, due to its size, illumination and changing display, would be visually dominant, out of keeping and unduly prominent to the detriment of the streetscape and would fail to conserve or enhance the character or appearance of the Wokingham Town Centre Conservation Area. Similarly, through the identified erosion of character and appearance, the proposals would also fail to preserve the setting of the listed buildings and other assets, thus causing harm to their special interest.’*

Whilst we acknowledge that all sites must be assessed individually against their merits, it is clear that these types of proposals do not adversely affect the visual amenity, character and appearance of the area that is part of Primary Shopping Area. The proposed Street Hub is located outside a commercial retail premises, which has large brightly coloured glass frontage that are within a brightly lit environment of the town centre. As such, it is considered that the illuminated screens would have a neutral impact on the character, appearance and setting of the townscape.

Furthermore, the existing kiosk has an advertisement feature, albeit non-digital and the replacement with the feature on the Street Hub will mean that the net increase of advertisements in the area will be neutral, which means that the visual clutter will not increase.

As an example of a proposal for a Street Hub in a similar location is Appeal Ref: APP/C1625/W/25/3369080 (Appendix G), where Inspector Edwards observed, *'The phone kiosk to be removed already includes advertisement space on the one side. Also, there are signs attached to the shops and other units that face onto the walkway and I saw a significant number of free-standing signs on the pavement near to the appeal site. The displays on the hub would appear in keeping with the existing advertisements and the commercial nature of the locality. Also, the hub would be near to an existing street lamp and so the illumination of the advertisements would not appear unusually bright within a darkened area. The displays would be modern additions to the CA but they would be seen within a commercial area alongside shops and other advertisements rather than in a street where historic buildings are prevalent. Therefore, the displays would cause no detriment to the attractive qualities or the nature of the CA.'*

In terms of the luminance of the advertisement, the proposed screens will display a series of static images, which will feature no moving elements or dynamic displays. The method of illumination and suggested speed of change between each advert will be in strict accordance with well-established parameters and professional guidelines set out in the ILP Professional Lighting Guide 2023, which was included as part of the submission. It is argued, therefore, that these elements can reasonably be controlled via a condition if the Inspector considers that to be appropriate.

For the purpose of clarification, ILP Professional Lighting Guide outlines the following luminance levels within the Planning (Control of Advertisements) Regulations section and specifically in paragraph 9.5 below, which states that a development under 10m² should be 600cd/m².

The night-time performance values are based upon a white display (white being the most bright / worst-case scenario) and are advised as:

Table 9.1: Luminance limits in England as per the Regulations

Illuminated area	Maximum luminance cd/m ²
Not more than 10m ²	600
More than 10m ²	300

The Street Hub is fitted with controls that automatically dim and daylight saving sensors, which will change the brightness of the screens depending on the time of day or weather conditions. If there are any issues with the unit or screen, it will be made blank depending on the issue that has been presented. A condition would be accepted to formalise this level and also to set a day limit of 2500cd/m² if the Inspector agrees that this is necessary.

However, should the Inspector have further concerns regarding the impact of the proposed advertisements on heritage assets, a further condition to reduce the luminance to 300cd/m² would be accepted.

This matter was considered in appeal ref APP/G3110/H/22/3308267 Appendix H, where the Inspector Wilkinson noted, *'The advertisement displays would be illuminated and would be unrelated to the existing commercial premises on the street. However, the appeal site is located within an urban area which is lit by streetlights and buildings. Therefore, subject to a condition controlling the level of illumination in the hours of darkness and given the prominent urban and commercial character of the street, I am not persuaded that the digital displays would be unduly dominant or incongruous such that they would be harmful to visual amenity.'*

Therefore, based on the above assessment, it is considered that the proposal will not affect the quality and character of the area, given the city centre environment and is not poorly sited or designed. As such, the proposal is not contrary to paragraph 141 of the NPPF or policies TB19 and TB24 of the MDD (2014).

Conclusion

In conclusion, as discussed, the proposed Street Hub unit is a small-scale development that will not appear out of context within this busy urban environment. It represents a significant improvement to the fallback position of the existing kiosk being retained, in which the Street Hub is a form of development that is positively encouraged by the NPPF to harness improved digital connectivity and the usage of camouflaged existing features to provide cellular services.

The proposed advertisement, which is a feature of the Street Hub and not its primary function, does not represent, given the existing precedent of advertisements present on other street furniture, including the existing payphone kiosk.

It is considered that there will not be significant harm to the public realm, in which any such harm is outweighed by the public benefits of the proposal, most notably the array of features it offers as well as securing the appeal site's optimum viable use by replacing existing public call boxes. Therefore, when balanced with the tangible public benefits that will bring and the superior design of the BT Street Hub, when compared to the kiosk it would replace, it is considered that there would be limited harm to the public realm and townscape, so much so that the appeal for consent full planning consent and consent to display advertisements should be allowed.