



Appeal Decisions

Site visit made on 19 February 2026

by **M Cryan BA(Hons) DipTP MSc MRTPI**

an Inspector appointed by the Secretary of State

Decision date: 27 April 2026

Appeal A Ref: 6002333

Outside No 81 High Holborn, junction near Red Lion Street, London WC1V 6LS

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant planning permission.
- The appeal is made by Mr Simon Warner of British Telecommunications PLC against the decision of the Council of the London Borough of Camden.
- The application reference is 2025/0919/P.
- The development proposed is the removal of an existing InLink Unit, and the deployment of a replacement Street Hub 3 unit.

Appeal B Ref: APP/X5210/Z/25/3376613

Outside No 81 High Holborn, junction near Red Lion Street, London WC1V 6LS

- The appeal is made under Regulation 17 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (as amended) against a refusal to grant express consent.
- The appeal is made by Mr Simon Warner of British Telecommunications PLC against the decision of the Council of the London Borough of Camden.
- The application reference is 2025/4343/A.
- The advertisement proposed is two digital 75-inch LCD display screens, one on each side of the Street Hub unit.

Decisions

1. Both appeals are dismissed.

Preliminary and Procedural Matters

2. I have been appointed to determine two appeals at the same site, relating to a proposal for a new BT Street Hub. Appeal A relates to an application for planning permission for the hub itself, while Appeal B relates to an application for advertisement consent for the integrated digital displays.
3. The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (“the Regulations”) set out that powers shall be exercised only in the interests of amenity and public safety, taking into account the provisions of the development plan, so far as they are material, and any other relevant factors. The Council did not raise any concern about public safety in respect of the proposed advertisement (though it did in respect of the hub unit itself) and, based on all the evidence before me, I see no reason to take a different view. The Appeal B proposal has therefore been assessed solely in relation to amenity. While I have had regard to relevant policies of the 2017 Camden Local Plan (“the CLP”), they have not been determinative in Appeal B.
4. The appeal site is within the Bloomsbury Conservation Area (“the BCA”) and, in accordance with section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, I have a statutory duty to pay special attention to the desirability

of preserving or enhancing the character or appearance of the conservation area. This duty applies in respect of the consideration of whether to grant planning permission (Appeal A), and to advertisement applications and appeals (Appeal B) insofar as it relates to the consideration of amenity.

Main Issues

5. The first main issue in Appeal A, and the sole main issue in Appeal B, is the effect of the proposal on the character and appearance or visual amenity of the BCA.
6. For Appeal A only, there are three further main issues. These are:
 - Whether the proposed development would have an unacceptable adverse impact on safe and efficient pedestrian movement;
 - The impact of the proposed development on crime and public safety; and
 - Whether adequate provision would be made for maintenance of the proposed Street Hub unit.

Reasons

Character and appearance/visual amenity

7. The appeals relate to a site within the adopted public highway, on the footway on the north side of High Holborn. It is a busy area, with a variety of shops, offices and other commercial premises nearby. There is an existing BT InLink unit on the site, which provides free public Wi-Fi, free UK calls, USB charging, an emergency services button and a range of other digital services for those in the vicinity. The InLink unit has two digital display screens, one on each side, which carry advertising. The proposed development is the replacement of the existing InLink unit with a new Street Hub 3 unit, which again would have two digital display screens carrying advertising.
8. The area is one where, as might be expected in a busy part of central London, there is a variety of street furniture including lighting columns, traffic signs and signals and associated equipment cabinets; mostly, these are slender in form and set close to the edge of the footway. The new Street Hub 3 would be around a third wider, and set somewhat further from the kerb, than the existing unit. I address matters relating to pedestrian movement separately below, but in terms of visual impact, its size and positioning would make it a prominent feature on the footway which would add considerable clutter to the streetscape. This would be particularly appreciable when viewed past No 80 High Holborn (in either direction), as it would dominate and close off views along the relatively narrow footway on that part of the street.
9. The existing digital display screens are 0.69m wide and 1.21m high. The new ones would be 0.95m wide and 1.67m high, making their area around 90 percent larger than the existing displays. Rather than being “marginally bigger”, as suggested by the appellant, in my view this would be a substantial increase. The proposed siting of the Street Hub unit means that the advertisements would be visible for quite a distance along High Holborn in both directions. While the area is, as I have described, commercial in nature, shop and office frontages in the immediate vicinity are generally (if not quite universally) discreet and subdued in appearance; much commercial signage, for example, is relatively subtly externally-illuminated,

so bright and colourful displays are not a dominant feature of the locality. In this context, I consider that the size and prominence of the proposed advertisements would make them an intrusive element in the street scene, certainly far more so than is the case with the existing InLink unit.

10. The appellant has drawn my attention to two pairs of appeal decisions relating to the proposed replacement of InLink units with Street Hub 3 units in conservation areas within the Royal Borough of Kensington and Chelsea; one pair relating to a site on Notting Hill Gate¹, the other pair to a site on Kensington High Street². I do not know the full details of those other sites but, although I am not of the view that such units would as a matter of principle be unacceptable in conservation areas, the specific details of this scheme - and, in particular, the proposed siting of the replacement unit - would cause harm as I have described above. Similarly, although I note that the appeal site previously hosted two "legacy" BT telephone kiosks, the limited evidence before me (a Google Streetview image from 2008) suggests that these were very close to the edge of the footway, and therefore much more aligned with the other street furniture described above. None of these other factors amounts to a substantive justification for allowing the particular appeal schemes which are before me here.
11. The conservation area is large in size, predominantly comprising a grid of broad streets with formal landscaped squares, though the southern older part of the area including the appeal site is less consistent in this respect. The Council's 2011 BCA Appraisal and Management Strategy identifies the proliferation of advertisements as a particular threat to the character of the conservation area. For the reasons I have set out above, I conclude that the appeal schemes would cause significant harm to the character and appearance, and to the visual amenity, of the BCA. There would therefore be conflict with Policies D1 and D2 of the CLP which together, and among other things, seek to ensure that new development respects local character, and preserves or enhances the historic environment and heritage assets, including the BCA.
12. In the terms set out in the National Planning Policy Framework ("the Framework"), the harm to the character and appearance of the BCA would be less than substantial and, given the size of the BCA and the location of the appeal site, towards the lower end of that category. Nevertheless, paragraphs 213 and 215 of the Framework advise that any harm to or loss of designated heritage assets requires clear and convincing justification, and that any harm which is less than substantial must be weighed against the public benefit of the proposal. I acknowledge that the provision of WiFi and telephone services, and from the use of the digital screens to display public information, would be public benefits. However, I do not consider that these benefits would outweigh the harm I have found. The proposal would therefore also conflict with the provisions of the Framework which seek to conserve and enhance the historic environment.

Pedestrian movement

13. During my site visit I saw that the positioning of the existing InLink unit means it interrupts the obvious pedestrian "desire line" along the footway; I observed many passers-by executing something of a "swerve" from the outside of the substantial street tree a short way west of the unit, passing inside the InLink unit, before

¹ PINS Refs: APP/K5600/W/25/3372034 and APP/K5600/H/25/3372037

² PINS Refs: APP/K5600/W/25/3371814 and APP/K5600/H/25/3371816

curving back to the narrower footway in front of No 80 High Holborn (or vice versa when heading in the opposite direction). The proposed Street Hub 3 would, as I have already described, be wider than the existing InLink unit, and positioned further into the footway. It would cause a still greater obstruction of the natural desire line and, while this would not necessarily lead to any significant harm to the safety of pedestrian movement, would certainly hinder its efficiency.

14. The appellant drew attention to the around 6.5m passing space which they considered would remain available in front of No 81 High Holborn. However, there are additional planters in front of that building beyond those shown on the submitted drawings (though they can be seen in photographs within the appellant's statement) which mean the actual space available is rather less than that identified. In any event, and as I have highlighted above, people's natural desire is to take a short and efficient walking route, which is already limited by the street tree and the narrowing footway in front of No 80.
15. I conclude that the size and, in particular, the siting of the proposed replacement Street Hub 3 unit would have an unacceptable adverse impact on the efficient movement of pedestrians. The development would therefore conflict with Policies A1, C6 and T1 of the CLP. Together, and among other things, these policies seek to ensure that development meets the highest practicable standards of accessible and inclusive design, and prioritises walking (among other sustainable means of transport) by providing high-quality footpaths and pavements of adequate width.
16. I find no specific conflict on this matter with Policy G1 of the CLP which identifies areas for growth and development in Camden. This does not alter my overall conclusion on this issue.

Crime and public safety

17. The Council has described installations such as telephone kiosks and communication hubs as "crime generators" and focal points for anti-social behaviour. The Metropolitan Police's Crime Prevention Design Advisor ("the CPDA") commented that the area has higher than average crime rates, including opportunistic thefts (though it is not clear how tightly drawn "the area" is in that description), and observed that although the appeal site is on a very active road "there is not a great deal of ground floor activation/natural surveillance from the neighbouring building". The CPDA also noted that the "free calls" facility at existing InLink units had been used to coordinate drug dealing, though this was also couched in general terms rather than specifically related to the unit currently at the appeal site.
18. While I do not seek to downplay the harmful impacts of street crime and anti-social behaviour, there is no substantive evidence before me to demonstrate that those issues would be increased as a result of the proposed development. Indeed, as the proposed Street Hub 3 unit would replace an existing unit, I consider that it would be likely to be broadly neutral in this respect.
19. As such, there would be no significant adverse effect on crime and public safety. I therefore find no conflict with Policy C5 of the CLP, which seeks to tackle crime and anti-social behaviour, and to promote safer streets and public areas. I also find no conflict with Policy T2 of the CLP which, although referred to on the decision notice issued by the Council, relates to parking and car-free development, so does not appear directly relevant to this main issue.

Maintenance

20. I acknowledge the Council's concern that a lack of maintenance for the proposed Street Hub 3 could lead to it falling into disrepair and detracting from the quality of the streetscene. The Council considered that maintenance of the installation could only be achieved through a section 106 agreement. I was directed on this matter to other dismissed appeals in Camden in which the matter of maintenance had been considered.
21. In respect of a proposal for a telephone kiosk outside Nos 216-217 Tottenham Court Road³, an Inspector noted in 2020 that the "proposed maintenance regime would be likely to reduce the effects of [crime and anti-social behaviour such as urination and vandalism or graffiti]". Dealing with appeals in 2022 relating to a proposed Street Hub 3 unit outside No 39 Tottenham Court Road⁴, the Inspector commented that "there is no legal mechanism in place to ensure that an appropriate maintenance plan is implemented in perpetuity".
22. I observed during my site visit that the existing InLink unit at the appeal site appeared clean and well-maintained. Nevertheless, I accept that there is a risk that such units may become neglected over time, to the detriment of the streetscene, and that appropriate maintenance should be secured. However, nothing which has been put before me indicates that this could only be secured by a planning obligation, and I note that in the 216-217 Tottenham Court Road decisions just referred to there is no indication that a planning obligation was before the Inspector (though those appeals were dismissed for other reasons). The *Street Hubs Beyond Connection* document ("the SHBC document") submitted as part of the planning application states that Street Hub units are visited every two weeks for cleaning and checked for damage, and that emergency visits can also be arranged in response to remote monitoring.
23. In view of my conclusion on the preceding main issue, as well as my observations on site I am satisfied that, had the proposal been otherwise acceptable, maintenance could be secured by a condition requiring compliance with the submitted details in the SHBC document. Subject to such a condition, I consider that adequate provision would be made for maintenance of the proposed Street Hub unit. As such, I find no conflict on this matter with Policies D1, D2, and A1 of the CLP, which among other things seek to manage the impact of development so as to protect quality of life in the borough, and to ensure that development is of sustainable and durable construction, and secure and designed to minimise crime and antisocial behaviour.
24. I also find no conflict on this matter with Policy G1 of the CLP which, as I have described above, identifies areas for growth and development in the borough; with Policy C6 which relates to access for all; or with Policy T1 which seeks to prioritise walking, cycling and public transport. All were referred to in the decision notice, but it has not been made clear how they relate to this particular main issue.

Planning Balance and Conclusion

25. I have found that the proposed Street Hub 3 unit would not be harmful in respect of crime or public safety, and that adequate maintenance could be secured by

³ PINS Refs: APP/X5210/W/20/3253878 and APP/X5210/Z/20/3253540

⁴ PINS Refs: APP/X5210/W/22/3297273 and APP/X5210/W/22/3297276

condition. However, I have also found that the size and siting of the unit would be harmful to the character and appearance of the BCA and to the efficient movement of pedestrians, and that the proposed advertisements would harm the visual amenity of the BCA.

26. While I have had regard to the benefits of the scheme which have been put to me, these do not outweigh the harm I have found. I therefore conclude that both appeals should be dismissed.

M Cryan

Inspector