

Bristol Walking Alliance (BWA) objects to the proposed installation of a further 26 BT Street Hub advertising signs to the detriment of the amenity of Bristol City Centre and Gloucester Road.

The proposed BT Street Hub units are essentially similar to, though slightly larger than, the previous InLink units which were refused permission by the Council in 2018. We believe the same reasons for refusal should apply to these applications.

We object to these installations for their obstructive siting, their visual effect on safety and the public realm and their potential for invasion of privacy. Each of these general objections is outlined in the following sections. Specific issues with individual sites are noted in the subsequent table.

Because of the prevalence of mobile phones, the demand for street phones is negligible. For the phone and tablet functions of the proposed units, their use will be inconvenienced by lack of shelter and privacy for the user, and in many of the applications by adjacent road noise.

Obstruction

Their intended purpose is for the advertising revenue they could bring to the applicant. Their siting is on busy pavements in the city centre and Gloucester Road where pedestrian numbers are high and where walking is encouraged as a sustainable mode of travel. Bristol Walking Alliance objects to the installation of any unnecessary pavement furniture on the functional grounds that it limits the free flow of pedestrian movement and is detrimental to safety. Pavement obstacles are a particular hazard to those with impaired vision.

The submitted plans are misleading in the amount of space required. The phone and tablet panel are situated on the edge of the monolith, so anyone using the phone or tablet panel will occupy additional pavement space, adding a further (say) 0.5m to the effective width of the monolith.

Visual impact

We also object to these monoliths on appearance grounds. Their excessive size is due purely to their advertising potential, since the wifi and 5G functionality could be provided on a simple pole.

Advertising, by its nature, is designed to grab the attention of those who are sighted. It can therefore distract the attention of pavement users, or road users, presenting a potential safety hazard to those navigating their way along, across or beside roads. This may be particularly true for modern, brightly illuminated, changing display panels.

Given that their key visual impact is the presentation of advertising, their excessive size is detrimental to the overall streetscape and to the amenity and enjoyment of the urban scene for all. This is particularly the case for those sited in conservation areas.

Privacy

The BT Street Hub monoliths each include three cameras, capable of monitoring activity in the street. This introduces the potential for increased surveillance and invasion of privacy outside local authority control. Advertising companies, such as those involved with these applications, are already exploring the potential of facial recognition for measuring and adapting their messages to individuals.

Specific additional issues with individual sites

For each of the current set of 26 applications, we highlight the additional issues with each site. The issues are as follows:

Pavement obstruction: The proposed position of the BT Street Hub introduces an obstruction into the middle of the pavement that will require pedestrians to alter their course around it. This is particularly a hazard for those with visual impairments. (Affects safety and amenity)

Pavement too narrow: The proposed position of the BT Street Hub (in addition to being an obstruction) will make the remaining pavement width unacceptably narrow for pedestrians to pass. (Affects safety and amenity)

Driver distraction: The proposed position of the BT Street Hub is adjacent to a busy road and could distract drivers from awareness of road movements, including pedestrians crossing the road. (Affects safety)

Conservation area: The proposed BT Street Hub is sited in a conservation area to the detriment of the visual amenity of the area. (Affects amenity)

App. No.	Location	Additional issues
22/04337/F	Pavement O/s The Gym Group Quakers	Pavement obstruction
	Friar Merchant Street Bristol BS1 3BU	
22/04339/F	Pavement O/s Colston Avenue Bristol BS1	Pavement obstruction; pavement too narrow (as
	4UB	shown on plan with temporary construction in
		progress); driver distraction; conservation area
22/04341/F	Pavement Outside 23-25 St Augustines	Pavement obstruction; driver distraction;
	Parade Bristol BS1 4UL	conservation area
22/04492/F	BT Hub Adjacent To 11 Baldwin Street	Pavement obstruction; driver distraction;
	Bristol BS1 1NA	conservation area
22/04494/F	Anchor Road InLink Outside 1 Canons	Driver distraction; conservation area
	Road Bristol BS1 5TX	
22/04496/F	BT Kiosk Site (1102-5779) Near Corner Of	Pavement obstruction; driver distraction
	Whitson Street Marlborough Street (South	
	Side) Bristol BS1 3NU	
22/04498/F	Outside 33 - 47 (Formerly Debenhams)	Driver distraction
	The Horsefair Bristol BS1 3JE	
22/04500/F	Pavement Outside Of 377 Gloucester	Driver distraction
	Road Horfield Bristol BS7 8TP	
22/04502/F	InLink Outside Prudential Building Wine	Pavement obstruction; driver distraction;
	Street Bristol BS1 2PH	conservation area
22/04504/F	Pavement O/s Sainsbury Store 256 - 258	Pavement obstruction; driver distraction
	Gloucester Road Horfield Bristol BS7 8PB	
22/04506/F	Pavement Outside 4A Gloucester Road	Driver distraction; conservation area
	Bristol BS7 8AE	
22/04667/F	Pavement O/s Three 84 Broadmead	Pavement obstruction
	Broadmead Bristol	
22/04742/F	Outside 65 Broadmead Bristol BS1 3EA	Pavement obstruction

22/04744/F	Pavement Opposite Steps To Fairfax	Driver distraction
	Street Union Street Bristol BS1 2DF	
22/04746/F	Pavement Of Union Street At The	Pavement obstruction; driver distraction
	Entrance To Broadmead Bristol	
22/04839/F	Pavement Outside 5-7 Bridewell Street	Pavement obstruction; driver distraction
	Bristol	
22/04841/F	Pavement Outside Brewers Fayre Lewins	Pavement obstruction; driver distraction
	Mead Bristol	
22/04843/F	Pavement Near Junction With The Friary	Pavement obstruction; driver distraction
	Temple Gate Bristol	
22/04845/F	Pavement Adjacent Graze 63 Prince Street	Pavement obstruction; driver distraction
	Bristol BS1 4JZ	
22/05025/F	Pavement Outside 2 - 4 Broadmead Bristol	Pavement obstruction; pavement too narrow
	BS1 3HH	(between bench and bollards);
22/05027/F	Pavement Opposite 51-53 Merchant	Pavement obstruction
	Street Broadmead Shopping Centre Bristol	
22/05029/F	Pavement Opp. Old Market Roundabout	Pavement obstruction; driver distraction
	Corner Of Castle Street, And Slip Road To	
	Temple Way Underpass	
22/05031/F	Pavement East Side Bond Street South	Pavement obstruction; driver distraction
	North Of Car Park Exit Bristol	
22/05034/F	Pavement Outside 101-105 The Horsefair	Driver distraction
	(MacDonalds) Bristol	
22/05036/F	Pavement Outside NCP Car Park Bond	Pavement obstruction; driver distraction
	Street Bristol	
22/05038/F	Pavement Outside 52-62 Bond Street	Pavement obstruction; driver distraction
	Bristol	

Additional advertising considerations

As well as objecting to the siting, visual impact and privacy implications of these units, we believe Bristol City Council should also refuse to approve the use of advertising on these units if such advertising would not have deemed assent, for example because advertisements would be illuminated or would appear on more than one face of the unit, or if in a conservation area.

We also believe that the applicant's request for consent for 10 years is out of line with the normal practice of giving consent for a 5 year period, after which approval could be reviewed if necessary.

As such, we also object to the 26 associated advertising consent applications:

```
22/04338/A, 22/04339/F, 22/04340/A, 22/04342/A, 22/04493/A, 22/04495/A, 22/04497/A, 22/04499/A, 22/04501/A, 22/04503/A, 22/04505/A, 22/04507/A, 22/04668/A, 22/04743/A, 22/04745/A, 22/04747/A, 22/04840/A, 22/04842/A, 22/04844/A, 22/05026/A, 22/05028/A, 22/05030/A, 22/05032/A, 22/05035/A, 22/05037/A, 22/05039/A
```

Bristol Walking Alliance 11 November 2022

enquiries@bristolwalkingalliance.org.uk