

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 22/07/2026 4:30 PM from B Lowe.

Application Summary

Address:	Land North Of 14 Wallace Parade Goring Road Worthing West Sussex
Proposal:	Proposed installation of 1no. new BT Street Hub, incorporating 2no. digital LCD advertisement screens
Case Officer:	Jo Morin

[Click for further information](#)

Customer Details

Name:	B Lowe
Email:	
Address:	Carnegie Rd Worthing

Comments Details

Commenter Type:	Member of the Public
Stance:	Customer objects to the Planning Application

Reasons for comment:

- Design
- Loss of General Amenity
- Other
- Overdevelopment
- Privacy Light and Noise

Comments: I OBJECT to this proposed installation on the following grounds:

- Urbanised, unsightly blemish to the local area.
- Clutter on pavement contrary to any Clean Streets Charter.
- Obstacle for mobility impaired, sight impaired and pushchairs. Each installation could limit the flow of pedestrian movement.
- It would, by reason of siting and size, result in unnecessary clutter resulting in visual harm to the character and appearance of the sites, detrimental to the visual amenity of this areas and would fail to contribute positively to the local areas.
- Designed to be deliberately distracting, together with the huge bulky, solidity of the structure, the hubs could cause problems for road safety with pedestrians, cyclists

and drivers not having a clear view of each other.

- Unnecessary advertising, primarily an advertising hoarding with a cursory phone/ wifi/ etc attached.

- The applicant has not provided sufficient justification that the Street Hubs are necessary.

- Excessively large illuminating screens that will disturb and negatively impact insects, moths, bats and birds, contrary to any 'Biodiversity Net Gain' plan.

- Constantly changing screens, an assault on the senses.

- NOTE - All public authorities have an obligation and duty to act in the public interest and protect people from harm.

- The Public Sector Equality Duty (PSED) requires local authorities to have 'due regard' to the impact of any proposed policy - including planning decisions regarding the installation of illuminated advertising boards - on groups with protected characteristics, which includes light-disabled people and those susceptible to flickering digital screens.

- Likely to attract graffiti and antisocial behaviour despite the promise of monitoring it. Who will pay for the security, cleaning, repairs and maintenance?

- The types of electronics in these hubs emit ultra-sonic frequencies which affect both wildlife and people who can hear outside of normal spectrums. These frequencies cause headaches and nausea in those who can hear them. There are no plans to monitor noise emission, nor how to regulate it.

- Energy consumption. Who pays for the power to support their running 24/7? How can the increase in energy be justified in view of Sustainability / Net Zero goals? The council should be aiming to reduce energy consumption, not adding energy guzzling Street Hubs at a time when many are struggling to heat their homes.

- Digital advertising screens use a great deal of electricity. Where is the evidence for claims of energy efficiency? The plans have no public benefit and the energy usage from the national grid will contribute to global heating. A conservative estimate is that one large digital advertising screen (6.4 metres x 3.1 metres) uses more electricity than 11 average UK households. This undermines the local authorities' net zero ambitions.

- No information provided to demonstrate how the proposed development would integrate sustainable technologies to promote sustainable design and construction. Without this information, it is difficult to accurately assess how the proposals would reduce energy demand in order to accomplish sustainable principles. Any Environment Statement should consider the implications of this infrastructure from extraction, processing, usage and disposal of the materials for street hubs, and include the effects of the radiation emitted from all the antennae on the proposed mast (which can be regarded as effluvia or as a pollutant) on public health.

- Please apply your decisions about advertising sites based on current priorities such as climate change, biodiversity and mental health.

- The ICNIRP certificate with this application, refers only to the "design" of the installation and does not conform to the required statement provided in the 'Code of Practice for Wireless Network

Development' (<https://www.gov.uk/government/publications/code-of-practice-for-wireless-network-development-in-england/code-of-practice-for-wireless-network-development-in-england#annex-b--supplementary-information-template-and-annex-c-icnirp-declaration-and-rooftop-deployment-constraints-and-solutions>) where the Applicant is required to declare that "the proposed site shall be operated to be in full compliance with the requirements of the radio frequency (RF) guideline limits of the International Commission on Non-Ionising Radiation Protection (ICNIRP) for public exposure and UK legislation." (* also currently in use by a large number of telecoms applicants across the UK.)

By using the words 'is designed', the Applicant is evading responsibility (liability) for the operation of the installation at the required ICNIRP levels and, thus, deflecting that liability which can have serious repercussions in the event of future adverse health claims from residents living in close proximity to these masts.

ADDITIONALLY, Ofcom states: "A1.14 We do not agree that EMF risks can be appropriately addressed by only imposing obligations on manufacturers. Regardless of the steps a manufacturer takes to mitigate EMF risks, it is the user or operator of the equipment that is ultimately in control of how the equipment operates and any EMF levels that are produced by the equipment on an ongoing basis"

- <https://www.ofcom.org.uk/siteassets/resources/documents/spectrum/emf/general-notice-final-decision-emf-licence-variation.pdf> (Publication Date: 18 May 2021) so how do we know that the hub operated within safe levels of radiation?

The very nature of these street hubs is encouraging people to stand close to the screens, and dangerous levels of radiation.

- It raises questions over privacy, as each will have a video camera on top of the screen (for "future use"). What would be the range of the CCTV? What images would be captured? Would it capture and record biometric (facial recognition) data? With whom would the data being shared? Who has any individual's consent to store and process that data and how does that sit with people's rights or even lawsuits around police use of facial recognition technology in the UK?

*A recent court case against Cheltenham Borough Council (CBC) has confirmed that lawful obligations extend beyond simply accepting the ICNIRP certificate.

SEE: <https://caselaw.nationalarchives.gov.uk/ewhc/admin/2024/1035>

The court made clear that risks to individuals with metal or medical implants-such as pacemakers, clips, plates, and shunts, etc. - are NOT assessed by the ICNIRP certification process, and that these risks MUST be taken into account by local planning authorities when deciding where masts are sited.
