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OBJECTION to 3 BT HUBS

AWDM/0643/26 (COMMENTS By 23 JULY)

Land North Of 14 Wallace Parade Goring Road Worthing West Sussex

AWDM/0641/26 (COMMENTS By 27-JULY)

Land South Of 2 Broadwater Street West Worthing West Sussex

AWDM/0639/26 (COMMENTS By 30-JULY)

Land North Of 41 To 43 South Street Liverpool Road Worthing West Sussex

Proposed installation of 1no. new BT Street Hub, incorporating 2no. digital LCD advertisement screens

Note: anyone can comment on a planning application - see the Planning Practice Guidance on Consultation (<https://www.gov.uk/guidance/consultation-and-pre-decision-matters#Public-consultation>)

As a regular visitor, I **object** on the following grounds:

SITING and APPEARANCE + VISUAL POLLUTION

Street hubs are primarily a means of

(a) infilling the 4G/5G network (without people's knowledge or consent),

(b) unnecessary advertising

dressed up as benefiting the public, but in fact the functions offered are largely (if not totally) redundant. All hubs have oversized illuminating screen which have no place on a busy pavement or roadside, on which images change at 10 second intervals.

People are already on tech overload without extra being put deliberately in their pathway.

These are an unnecessary assault on people's senses without any benefit to the public.

The sites are on roads, some of which are very busy. The Mitre Street is on a corner so could be too distracting, compromising safety of road users and pedestrians (more details later). Broadwater Street has a lot of street clutter already. Adding more would make obstruct pedestrian flow. It does not need any further cluttering, especially with oversized digital junk.

For applications where an old box is also being removed

Old phone boxes are now largely redundant due to most people having their own mobile.

It should be noted, however, that replacing new-for-old would not be replacing like-for-like.

The old BT phone boxes are relatively see-through. The new street hubs are solid structures from top to bottom, with oversized illuminated screens.

The old boxes stand quietly, without drawing undue attention, and harming no one.

The new screens, with their large glossy digital screens pretty much shout out for attention, and the LEDs and radiation emitted DO cause harm (see below).

In addition, the old boxes, were enclosed spaces, which allowed phone calls to be conducted in privacy with ease of hearing.

How about removing any old boxes, decluttering the respective area(s) and leave it that, without re-cluttering the area / elsewhere with oversized digital junk?

UNNECESSARY CLUTTER

Currently in Europe there is a movement afoot to reduce visual clutter or “visual pollution” in public spaces and reclaim them from commercial overreach and dominance.

With fewer ads and less clutter, there could be more breathing space to appreciate our surroundings better, leading to more aesthetically pleasing streetscapes, and restoring our physical spaces for free flow of movement and a sense of calm.

Several cities have put controls in place towards cleaner, urban areas. For instance, Warsaw is passing laws to reduce the presence of advertisements in its public spaces. Prague, Budapest, Amsterdam, Paris, and many others are taking similar steps.

Overall, the aim is to make their towns and cities more liveable.

The UK, on the other hand, seems to be heading in the other direction by making our public spaces more frantic with an ever-increasing visual overload. Our streets already lack the aesthetics of many European cities and if hubs continue to be allowed, will look even more the poor cousins of their European counterparts.

It would be fabulous if the UK could follow Europe’s commendable lead.

Normal street furniture / clutter such as lampposts, cycle hoops, bins, benches, trees etc serve a USEFUL/aesthetic purpose, whereas there is no benefit to an advertising screen and the other features offered would be pretty much redundant – see below.

Normal street furniture allows clear sight of the full length of a pavement. Hubs are tall and solid and thus obscure this view.

Overly dominant and visually intrusive in their immediate area, hubs block visibility right down to the ground and can make some people feel unsafe.

A pavement is intended for PEDESTRIANS to walk along, not an obstacle course to negotiate, which is what our pavements are fast becoming with all this unnecessary ugly “street furniture”. Companies seem to interpret a space as an invite to infill with their hideous digital structures. The public do not want these.

Such an outsized screen would add clutter and could impede pedestrian flow, causing a potential obstacle / hazard to people with disabilities such as visual, mobility and cognitive impairment, the elderly, and parents with pushchairs.

The Council has a duty to consider the impact that street furniture may have on disabled people (particularly those with visual or cognitive impairment) who rely on the legibility of street and surface features in order to identify and negotiate their surroundings.

Overall, any hub/kiosk would give a bland and homogenous feel to the streetscape and would be utterly OUT OF PLACE. It would result in a cluttered streetscape, visually harming to the character and appearance of the site and street scene and would fail to contribute positively to the local area.

From a practical point of view, new hubs are generally sited close to busy roads/traffic and/or on busy pavements and provide neither privacy nor the ability to hear clearly.

How long would it be before such an installation looked worn out and untidy? I have seen some in London which look well past their best.

Street hubs have been found to attract graffiti, drug dealing, and hoax calls in other towns/cities. How would this be avoided?

ROAD SAFETY

Hubs/kiosks are also totally unsuitable when sited on the side of roads.

In an article in 2017 on electronic advertising billboards, “Drive Smarter” stated “When travelling at 50MPH, a one second glance at a billboard results in 22 metres of travel not seen by the driver. That increases to 27 metres at 60MPH.” This stretch of road might not see such high speeds, but this statistic highlights the risks posed when any distraction is placed along the roadside.

Being a driver myself, I know how driving in towns / cities demands extra vigilance nowadays, requiring awareness of fellow drivers/cyclists, potential pedestrians crossing, not necessarily at designated crossing areas. This is on top of keeping an eye on road signs, road markings etc. It seems contrary to common sense to place distracting hubs by road sides and thus increase the probability of accidents.

Hubs are deliberately designed to be distracting (the nature of adverts, and particularly so digital ones). It is after all, the revenue from adverts which maintain the hubs so it is of financial benefit to site the hubs where views of the advertisements by both pedestrians and vehicle users would be maximised.

This distraction factor together with the huge bulky, solidity of the structure, means that any such hub could compromise road safety with pedestrians and drivers/cyclists not having a clear view of each other.

Surely, we need to be taking steps to reduce any distractions for motorists and to optimise road safety.

The PPG states that “All advertisements are intended to attract attention” and the list of main types which may cause danger includes

- ** those which obstruct or impair sight-lines at corners, bends or at a junction
- ** where the means of illumination is directly visible from any part of the road
- ** could result in glare and dazzle, or distract road-users, particularly in misty or wet weather
- ** are subject to frequent changes of the display.....

I would have thought that these points would apply to most hubs/kiosks placed at the side of roads.

The Appeal Report for APP/E5330/H/24/3350920 (NWP Kiosk) (Greenwich) refers to many of these points in its dismissal.

Drivers are expected to concentrate on the road. Hence unnecessary distraction should be limited, not placed deliberately in their eyeline, and thus increase the chance of accidents.

ADVERTISING

It would simply be adding an extra and unnecessary layer of advertising to the public realm which would very likely have NO direct link or association with businesses/services in the area.

The monthly cost of advertising is astronomical and as such local independent businesses are unlikely to be able to afford this.

This means that adverts from multinationals could take shoppers away from local independent shops and town centres.

The content of advertising is also questionable. One only has to watch one of these digital screens for a few minutes to witness a stream of adverts for junk food, fashion, perfumes, cars and the like, mostly promoting

consumerism at a time when people are feeling the pinch and we are being encouraged to “save the planet” and its precious resources. The whole thing is contradictory.

The other huge concern is that many of the fast-food adverts are found to encourage youngsters to buy the products, many of which are HFSS (high in fat, sugar or salt), paving the way for a future of adults with major health conditions. This cannot be right.

FUNCTIONS OFFERED

As most people nowadays have their own mobile phones, what use is the free public wi-fi (which is not secure), calls, and connectivity? Those individuals who do not own mobile phones choose not to for a reason and are therefore also highly unlikely to make use of this facility. Hence, these functions are unlikely to be used much, if at all.

INCLUSION of 4G and 5G antennae

Most concerning is the inclusion of Wifi, 4G & 5G antennae, and small cell technology (ie mm wave technology).

This means there would be YET more EM radiation emitting in places where people live, work and shop.

For a mast application there is

- (a) An ICNIRP certificate submitted to guarantee safety of the installation
- (b) Exclusion Zones (although rarely published) which are calculated to provide some protection / safety checks for the general public. An Exclusion Zone is effectively a NO-GO area for a member of the public.

ICNIRP Certificate

NPPF (2024), Para 122 states that for a new mast or base station “a statement that self-certifies that, when operational, International Commission guidelines will be met”. i.e. an ICNIRP certificate should be included as part of the application.

The NPPF does not qualify size of base station, therefore cannot be interpreted as meaning only the macro base stations.

A small cell is defined in many industry-wide documents as a small base station which operates at lower power and a smaller coverage range than traditional base stations but nonetheless is an integral part of the overall network.

This is confirmed by BT in the section on “ICNIRP Exclusion Zones” in its ICNIRP certificate.

Likewise, in an officer’s report (Manchester) it was stated that “*Success of public Wi-Fi delivered in this way depends on density and frequency of similar Wi-Fi devices on streets. Smart Hubs are an addition to connectivity in the city*”.

Hence, street hub applications should include an ICNIRP certificate.

Exclusions Zones

For a street hub, members of the general public could stand right next to one of these hubs for a long period of time (indeed they are being positively encouraged to do so!!!), where there is no guaranteed safety.

ICNIRP guidelines – specific exclusions of metal implant and AIMD wearers

ICNIRP guidelines specifically exclude individuals with a metal implant or AIMD (Active Implantable Medical Device) in their body.

As the street hubs/kiosks have 4G/5G/small cells, this could pose an additional risk to those individuals.

Further, the UK Health Security Agency (UKHSA) has stated in a response to an FOI that anyone with an AIMD *should* be protected if **they** respect the ICNIRP public exclusion zones, but in the case of a street hub, such individuals could easily wander into and in fact stand for some time in such a zone. This is a public safety issue.

EHS / EMR-S individuals

An increasing number of people are now suffering with EMR-S (Electromagnetic Radiation Syndrome, aka EHS (electro-hypersensitivity)) which is being exacerbated by the growing number of electronic devices, masts, hubs etc which are becoming ubiquitous. Their day-to-day life, trying to do normal things such as shopping, is becoming a stressful and unpleasant, and in some cases, impossible, experience.

The installation of street hubs would discriminate against such sufferers.

(See Paul Hensinger and Bend I Budzinski “Why electrohypersensitivity (EHS) is a biologically expected reaction to harmful radiation”.)

ICNIRP Certificate included

What evidence has been submitted to demonstrate that calculations performed for the proposed structure have taken into account the cumulative emissions from ALL neighbouring base stations and ALL street hubs in the area?

There is no central register held of all telecoms structures, and it seems that at application / appeal stage, no one is cross-checking this crucial safety measure.

LPAs and Planning Inspectorates dismiss concerns by stating that there is no compelling evidence to indicate that ICNIRP guidelines would not be complied with, but equally, there is NO compelling evidence to indicate that they would. A self-certified piece of paper fails to instil confidence that anyone has actually checked cumulative emissions.

Impact of hub installations

NOTE: Street hubs form part of an operational electronic communications network which is intended to provide mobile telecommunications services beyond the immediate site. As such, any such hub is not limited to its physical footprint. It is not self-contained or purely site-specific; it is an element within a wider networked system designed to operate continuously over its operational lifetime.

The impact of any hub is therefore not limited to its immediate footprint (as seen on the site plans) but would be a lot further reaching.

In order to adjudicate this development, the LPA should obtain all technical details about the proposed apparatus, including exclusions zones (which should be available to the public), and cumulative exposures, in line with the recent court cases which have pointed out that people with metal implants and AIMDs are not covered by the ICNIRP guidance on which councils are relying for safeguarding the health of its residents.

LEDs

Equally **concerning is that the use of LED sources** for lighting and display screens has an impact on human health. According to the registered charity LightAware, the spread of new light sources has resulted in a dramatic increase in the numbers suffering light sensitivity and increased exclusion for society of light-sensitive people.

When exposed to LED lighting, such as that found in street hubs, people with pre-existing health issues can find their conditions exacerbated (such as migraine, autistic spectrum, skin, and eye conditions, epilepsy). Others with no previous health issues can also experience symptoms, ranging from mild to severe, such as anxiety, eye pain, headaches, migraines, skin burning and rashes, dizziness, fainting and vomiting.

For some sufferers, the severity of their physical reactions to LED lighting and advertising boards requires avoidance of even minimal exposure, and the adverse impact on their day-to-day life is so extreme that they meet the test for disability under the Equality Act 2010. This means that local authorities have legal duties towards them regarding planning decisions concerning the installation of lights and LED advertising boards.

There are numerous studies now showing eye damage caused by the blue light on screens. This might not have an immediate effect on an individual but contributes long term to serious eye conditions such as AMRD and cataracts. Do we really need yet more blue light exposure when we are simply walking from A to B along a pavement?

For several years, LED lighting has been acknowledged to harm eyesight. In the “Annual Report of the Chief Medical Officer 2017, Health Impacts of All Pollution – what do we know?”, John O’Hagan of, Public Health England authored the section on Light pollution on health. There is a major concern over LEDs and the risk to retinal damage amongst other problems. “Disruption of the circadian system can have a major impact on sleep quality and daytime alertness, which in turn impacts wellbeing and safety. It is a bit like having permanent jet lag.’

LPAs have a legal duty towards its residents regarding planning decisions concerning the installation of lights and LED advertising boards.

FURTHER CONCERNS

A friend recently described a street hub as a giant smart phone in the public arena. All screens, including those in street hubs, are designed to be deliberately addictive. A Kings College study back in 2019, found that 1 in 4 children showed clear signs of addictive behaviour over their smart phones. The group Smartphone Free Childhood is growing rapidly as more concerned parents join, and in May-2024, there was a Westminster Hall debate regarding the clear and urgent need to ban smartphones in schools, for the health of children and teachers. The addictions expert, Dr Nicholas Kardaras, has talked of the risks to children from screen time and tech overuse, including behavioural and health concerns. The constant push for a digital life and the growth of our technological infrastructure, including smart hubs, is feeding an addiction in everyone, not just children, which is nigh on impossible to cure, and is contributing greatly to the serious mental health issues and a paucity in “well-being”.

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

I would suggest, considering the above growing evidence, that approving any street hub would be totally irresponsible.

CCTV / VIDEO CAMERAS

Another concern is data capture and privacy.

Many hubs include CCTV, “smart city” sensors for data collection

Video cameras / CCTV are capable of monitoring activity in the street, but also have the potential for increased surveillance and invasion of privacy outside local authority control. This is surveillance and monitoring of pedestrians **without their knowledge or consent**.

What would be captured, monitored, and recorded? How would this data be used and by whom?

Advertising companies are already exploring the potential of facial recognition for measuring and adapting their messages to individuals.

Is this a human rights issue?

What about the invasion of privacy to people whose residences are within line sight of the cameras?

SUSTAINABILITY, 'Biodiversity Net Gain' plans and WILDLIFE

The types of electronics in these hubs emit ultra-sonic frequencies can affect wildlife, and the LEDs in the large screen could negatively impact insects, birds, moths, and bats, contrary to any plan for increasing biodiversity.

These hubs would be energy hungry which is contrary to any Net Zero initiative / Climate Emergency / Sustainability goals. **Adfree Cities have estimated that each digital screen uses at least the power of 3 average households per annum.** How can the costs of running these be justified? Who is paying for these?

How clean, renewable and sustainable are these hubs when we factor in the full life cycle from CRADLE to GRAVE – the total energy consumption, mining of raw materials, transportation (including intercontinental), manufacture, and let's not forget disposal / recycling.

These hubs may boast reduced energy use etc but what we are presented here is a small portion of the overall lifecycle of this hub.

The bigger picture is FAR from green.

Let's not forget the dirty secrets of the mining for raw materials: poor and dangerous working conditions, exploitation of poorer communities, devastating and polluting the landscapes. Toxic chemicals are released both in the manufacture and when disposed of. Copious amounts of water are wasted and polluted. Fossil fuels are used in the manufacture.

We cannot conveniently look the other way whilst boasting sustainability and NET ZERO.

This flies in the face of any well-meaning initiative to save the planet and achieve "sustainable" / "net zero" goals.

The whole thing is paraded under a thick coat of greenwashing.

The best way to achieve sustainability would be NOT to implement all these street hubs in the first place!

No information has been provided to demonstrate how the proposed development would accomplish sustainability principles. An Environment Statement should consider the implications of this infrastructure from cradle to grave, including extraction, processing, usage and disposal of the materials. It should also include the effects of the radiation emitted from all the antennae on the hub (which can be regarded as effluvia or as a pollutant) on public health.

NPPF

NPPF (2024) para 131 states that "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 to make development acceptable to communities."

NPPF (2024) para 135: includes objectives such that planning policies and decisions should ensure that developments ** "will add to the overall quality of the area, not just for the short term but over the lifetime of the development" ** are "visually attractive" ** "sympathetic to local character and history" ** "create places that are safe, inclusive and accessible and which promote health and well-being where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience".

Installation of any hubs is also contrary to

** NPPF (2024) para 141 which states that “the quality and character of places can suffer when advertisements are poorly sited and designed..... Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.”

** NPPF (2024) chapter 12 which aims for well-designed and beautiful places, being poorly sited, and incongruous with an otherwise harmonious street scene.

A huge modern illuminated screen dominating an area fails to satisfy many of these criteria, for the reasons laid out in this letter. Such screens are not attractive to look at, most are not sympathetic to their surroundings, they can cause problems for certain individuals thus making them not at all inclusive, they certainly do not promote health and well-being, and many people feel unsafe around them as they block the immediate view.

SUMMARY

Overall, street hubs are for the benefit of advertisers, rather than the community. They are unsightly and unnecessary street clutter, and with the constantly changing screens, an assault on the senses.

They impose a sense of brash commercialism, with adverts promoting yet more unnecessary consumerism, and are very much a ubiquitous blot on our streetscapes, making our towns less attractive to residents and visitors alike. The adverts shown are also likely to detract from local independent businesses.

Due to their monolithic appearance (with substantial height and width) and level of illumination, such installations are too prominent in any street scene and are detrimental to the character and visual amenity of the area.

Their so called “public benefit” is far outweighed by potential harm to humans, wildlife, and the environment. Allowing such installations is surely incompatible with any equalities or disability legislation and contrary to any sustainability goals.

By virtue of the nuisance and credible harm or injury to the local residents and to the local area, being sufficient to outweigh the benefits of any such development, I urge you to refuse each application.

Thank you

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