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Adur & Worthing Councils  
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BN11 1HS

## **WRT-109**

14<sup>th</sup> May 2026

Dear Planning,

**BT Street Hub Project**  
**Full Planning and Advertising Application**  
**WRT-109 Pavement o/s Tesco Express, 2-2a Broadwater Street West, Broadwater,**  
**Worthing, BN14 9DA**  
**(E 514593, N 104458)**

We write on behalf of our client, BT, relating to various sites across your authority for the installation of BT Street Hubs and the associated removal of BT payphones. BT are moving forward with this particular case and are applying to Adur & Worthing Councils for full planning permission and advertisement consent for the installation of 1 no. BT Street Hub.

## **InLink Project**

The InLink UK service was first launched in 2017 and since then 494 InLink structures were rolled out in 23 cities. These units offer 1Gbps 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. HD displays on the sides are used to carry advertising, which helped to fund the units, but the screens can also show local content free of charge. After the suppliers of the InLinks went into administration in 2019 and are no longer able to supply units to BT, this product is no longer available. Since then, BT have been working on a new and improved unit, the BT Street Hub, that they are keen to rollout across Worthing and all major UK towns and cities.

## **BT Street Hub Project**

BT is continuing to move forward with public connectivity and benefits in which Street Hubs will provide a sleek and modern answer to the demands of a digitally connected society. BT Street Hubs include the ability to house 5G small cells which is very much in line with current UK Government's guidance on communications infrastructure and the National Infrastructure Strategy. This is echoed in the Government's commitment towards telecommunications deployment which has been strengthened since the conception of InLinks and NPPF in particular, confirms 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)."*

Since the rollout of InLinks, there has been increased focus on green initiatives and environmental monitoring. Street Hubs take this into account and can house sensors that count pedestrian, cyclist and vehicle movements as well as monitor air, sound and light. This free information will help the planning system actively manage patterns of growth in support of national air quality objectives and the Government's ten-point plan for a Green Industrial Revolution. It will be a useful source of real-time data in the delivery of the Council's own green agenda, travel plans and can be used to present a business case for carbon offset credit.

Overall, Street Hubs will help future-proof the high street making them smarter, safer, and more sustainable. Investment in the high street is at an all-time low, but that has not slowed BT down as they look to ramp up their rollout of new Street Hubs across the UK. They are continuing their commitment to invest and improve in the high street, with one Street Hub at a time, and with that, decluttering these environments with the associated removal of existing and redundant BT phone boxes.

This submission is comprised of the following documents:

- Site specific Planning and Design & Access statement;
- IApp forms and certificates generated by the Planning Portal;
- The prescribed fee of £1,220 (plus VAT) paid directly to the Council via the Planning Portal;
- Drawings including location plan map, proposed site plan, existing and proposed elevations;
- BT Street Hub Product Statement giving full details of the proposed structure;
- BT Anti-Social Behaviour Management Plan;
- 'The Institute of Lighting Professional's 'Professional Lighting Guide 05: The Brightness of Illuminated Advertisements' 2023 for your reference;
- International Commission on Non-Ionizing Radiation Protection (ICNIRP) certificate.

In certain situations, redundant phone boxes will be removed and replaced with a new Street Hub. While no phone kiosk is to be removed from the application site, an existing kiosk is to be decommissioned as part of the proposed scheme from the footpath outside the Co-op at Cricketers Parade, Broadwater, Worthing, West Sussex, BN14 9DB (approximately 90 metres north-west of the application site).

The application site and proposal is within adopted highways-controlled land, maintained at public expense. As BT are a statutory undertaker on such land, a developer's notice has been served on the Highways Authority and any others who have been identified from Land Registry records as being an owner of the land.

We trust the application can be registered at your earliest opportunity, in which should you require any further information or have any queries, please do not hesitate to email me.

Yours sincerely,



**Louis Freeman**  
Acquisition & Planning Surveyor  
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## Planning, Design and Access Statement

|           |                                                                                                  |
|-----------|--------------------------------------------------------------------------------------------------|
| Our Ref.  | <b>WRT-109</b>                                                                                   |
| Address   | <b>Pavement o/s Tesco Express, 2 – 2a Broadwater Street West, Broadwater, Worthing, BN14 9DA</b> |
| Lat/ Long | <b>50.828327, -0.37428266</b>                                                                    |
| Site Type | <b>Relocation</b>                                                                                |

As part of our collaborative approach to connecting and improving local streets, Full Planning Permission and Express Advertisement Consent is sought for the installation of 1no. BT Street Hub. Please see below for further details.

### Photomontage of Proposed Installation



### Proposed Kiosk Removals

Tel: 01903 204 648

Address: Pavement outside the Co-op at Cricketers Parade, Broadwater, Worthing, West Sussex, BN14 9DB



## **UK Digital Strategy**

Digital connectivity in 2025 is now considered to be a utility, and modern life is increasingly impossible without it. Connectivity drives productivity and innovation and is the physical underpinning of a digital nation. Being connected is fundamental to the success in our modern world and Street Hub provides a cost-free way for communities to get online and take advantage of available opportunities. The Government has committed that every individual and every business should have the skills and confidence to seize the opportunities of digital technology and have easy access to high-quality internet wherever they live, work, travel or learn.

## **National Infrastructure Strategy**

Published in November 2020, the Government acknowledges in its National Infrastructure Strategy that investment in our infrastructure is critical as the UK seeks to recover from the Covid-19 pandemic. The Strategy puts innovation and new technology at its heart, in which the BT Street Hub is at the forefront of this technological revolution. The Government's ambition is to support fast and reliable digital connectivity that can deliver economic, social and well-being benefits because new technologies have enormous potential to improve the environment and the daily lives of people across the UK. BT Street Hub can contribute to this with its suite of features, including Wi-Fi and small 5G cell capabilities, air monitoring and much more.

## **Town and Country Planning (Control of Advertisements) (England) Regulations 2007**

This application is for full planning permission under section 62 of the Town and Country Planning Act 1990 [the 1990 Act] and express advertisement consent under regulation 9 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 [the Regulations]. Applications for full planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise (Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the 1990 Act). Under the advertisement Regulations, Express Consent is required for the advertisement element, notably the 2no digital screens on each side of the Street Hub. As per regulation 3 of the Regulations, applications for Express Advertisement Consent must be determined in the interests of amenity and public safety, considering (a) the provisions of the development plan, so far as they are material, and (b) any other relevant factors.

The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 state the following specifically in relation to advertisement control:

### **PART I - General**

#### **Powers to be exercised in the interests of amenity and public safety**

3. (1) A local planning authority shall exercise its powers under these Regulations in the interests of amenity and public safety, taking into account;
  - (a) the provisions of the development plan, so far as they are material; and
  - (b) any other relevant factors.
- (2) Without prejudice to the generality of paragraph (1)(b);
  - (a) factors relevant to amenity include the general characteristics of the locality, including the presence of any feature of historic, architectural, cultural or similar interest;
  - (b) factors relevant to public safety include;
    - (i) the safety of persons using any highway, railway, waterway, dock, harbour or aerodrome (civil or military);
    - (ii) whether the display of the advertisement in question is likely to obscure, or hinder the ready interpretation of, any traffic sign, railway signal or aid to navigation by water or air;

(iii) whether the display of the advertisement in question is likely to hinder the operation of any device used for the purpose of security or surveillance or for measuring the speed of any vehicle.

(3) In taking account of factors relevant to amenity, the local planning authority may, if it thinks fit, disregard any advertisement that is being displayed.

(4) Unless it appears to the local planning authority to be required in the interests of amenity or public safety, an express consent for the display of advertisements shall not contain any limitation or restriction relating to the subject matter, content or design of what is to be displayed.

## National Planning Guidance

Planning policy is provided at the national level by the National Planning Policy Framework (NPPF). It is a material consideration in planning decisions.

It is not necessary to quote extensively from this document but the following points are highlighted.

## National Planning Policy Framework (December 2024)

The Government's latest National Planning Policy Framework (NPPF) was published on the 12<sup>th</sup> December 2024 and the Government's approach is to continue to strongly support communications infrastructure. The NPPF remains very supportive of high-quality communications. Indeed, a whole chapter is dedicated to high-quality communications, emphasising the importance that the Government attaches to digital connectivity. Paragraph 119 states that *"advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being."* This wording echoes the guidance set out in paragraph 42 of the 2012 version of NPPF. However, it also includes the importance of *reliable* communications infrastructure for both economic growth and social well-being.

The NPPF continues to support the expansion of electronic communications networks at paragraph 119. It notes that policies should set out how high-quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time. The economic and social benefits of providing high-quality and reliable communications infrastructure are well documented and can be found later in this Supporting Information Statement.

The NPPF supports the provision and promotion of sustainable transport at section 9. These relevant policies are set out below:

Paragraph 116 – *"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios."*

Paragraph 117 - Within this context, applications for development should: [...] *"c) create places that are safe, secure and attractive, which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards."*

The NPPF states the following specifically in relation to advertisement control in section 12:

Paragraph 141 - *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."*

The NPPF makes reference to 5G and electronic communications systems:

*“Planning policies and decisions should support the expansion of electronic communications networks, including next-generation mobile technology (such as 5G).”*

With the above in mind, the Government is already forward-thinking the evolution of data networks and seeks planning decisions to take account of this. 5G technology provides increased speed of data and more capacity in the network, to ensure that handheld devices can continue to be used for the purposes in which they were purchased. This will bring even greater economic and social benefits to the area.

Paragraph 120 of the NPPF retains the requirement to minimise the number of installations consistent with the efficient operation of the network but also includes being consistent with the needs of consumers and providing reasonable capacity for future expansion.

Paragraph 123 of the NPPF retains the guidance set out in paragraph 46 of the 2012 NPPF version which relates to determining applications on planning grounds only. *“They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.”*

At the heart of the NPPF is the retained presumption in favour of sustainable development (para 11). For decision-taking, this means approving development proposals that accord with an up-to-date development plan without delay or where there are no relevant development plan policies or the policies which are most important for determining the application are out-of-date, granting permission, unless the application of policies within the revised Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed or any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits when assessed against the policies in the revised Framework taken as a whole.

The NPPF continues to provide guidance on decision-making. At paragraph 39 it states that:

*“Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.”*

The NPPF builds on the aspiration to build a strong, competitive economy. Paragraph 85 states:

*“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken, should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation<sup>42</sup>...”*

Footnote 44 of the NPPF states:

*“The Government’s Industrial Strategy sets out a vision to drive productivity improvements across the UK, identifies a number of Grand Challenges facing all nations, and sets out a delivery programme to make the UK a leader in four of these: artificial intelligence and big data; clean growth; future mobility and catering for an ageing society. HM Government (2017) Industrial Strategy: Building a Britain fit for the future.”*

## Code of Practice for Wireless Network Development in England (March 2022)

The Code of Practice provides guidance to Code Operators (referred to as ‘operators’ throughout the Code of Practice), including the Mobile Network Operators and wireless infrastructure providers, their agents and contractors, local planning authorities, and all other relevant stakeholders in England on how to carry out their roles and responsibilities when installing wireless network infrastructure. It is also a useful tool for other interested stakeholders such as community groups, amenity bodies and individuals with an interest in mobile connectivity.

The aim of the Code of Practice is to support the government’s objective of delivering high-quality wireless infrastructure whilst balancing these needs with environmental considerations. It also has an important role in making sure that appropriate engagement takes place with local communities and other interested parties.

The Code of Practice covers all forms of wireless infrastructure development, including mobile towers and cabinets. It is recommended that other wireless communications operators follow the principles of this Code of Practice, where appropriate.

Unlike previous iterations this Code of Practice has been led by the Department for Digital, Culture, Media and Sport (DCMS) and developed in collaboration with representatives of the mobile network industry, other government departments and public bodies, local planning authorities, and protected landscapes. This document replaces the previous Code of Best Practice on Mobile Network Development, which was published in 2016 and is now published by DCMS.

The Code of Practice sets out the legal and policy framework for the delivery of wireless infrastructure development.

Paragraphs 8 – 12 of the Code of Practice set out the importance of connectivity:

8. *“Digital connectivity is vital to enable people to stay connected and businesses to grow. Fast, reliable digital connectivity can deliver economic, social and well-being benefits for the whole of the UK.”*

9. *“As the demand for mobile data in the United Kingdom is increasing rapidly, it is important that everyone has access to dependable and consistent mobile coverage where they live, work and travel.”*

10. *“The Future Telecoms Infrastructure Review (FTIR) and the National Infrastructure Strategy set out the government’s long-term strategy for meeting its digital connectivity targets and delivering high-quality, the reliable digital infrastructure that works across the UK.”*

11. *“The government has committed to extending mobile coverage across the UK. The government has committed to extending mobile coverage across the UK. The government’s Levelling Up White Paper has set a mission that the UK will have nationwide 4G coverage, with 5G coverage for the majority of the population by 2030. In support of this, the government and the UK’s mobile network operators agreed to a £1 billion Shared Rural Network deal to extend 4G mobile geographical coverage to 95% of the UK by the end of the programme.”*

12. *“Next Generation Mobile Technologies: A 5G Strategy for the UK, and the update to this, set out the government’s ambition for the UK to be a global leader in 5G to take early advantage of its potential and help to create a world-leading digital economy that works for everyone. The government also wants businesses and communities to benefit from investments in 5G as soon as possible. Through the government’s 5G Testbeds and Trials programme we have seen its value to manufacturing, farming, transport networks and healthcare.”*

The Government recognises the key role that the Planning System plays in delivering the digital infrastructure that we need, in a sustainable and well-designed way, especially as households and businesses become increasingly reliant on mobile connectivity.

The Code of Practice sets out 'How wireless networks function'.

Para. 16 states *"Cellular wireless networks use base stations to provide an area of radio coverage. Wireless technology uses the radio spectrum to broadcast radio waves between base stations and devices. Different radio frequencies have different characteristics which, along with the density of cell site locations, affect the extent of coverage and how much data can be carried over the network. Depending on the radio frequencies used, base stations can deliver coverage over a wide area or provide extra network capacity in areas where there is a high demand for network bandwidth."*

Para. 17 sets out that *"Wireless technology continues to evolve rapidly, and mobile devices are now capable of much more. Second-generation (2G) technology gave us voice calls and text messages, 3G led to the launch of smartphones, and 4G, which enabled faster browsing, allowed us to do things like watching videos on the move. 5G, the latest generation of wireless technology, is much faster than previous generations of wireless technology and can offer greater capacity and lower latency, allowing thousands of devices in a small area to be connected at the same time. 5G networks, and future mobile generations, will be vital for a range of Internet of Things uses (IoT) and Smart City applications."*

The Code of Practice establishes 'Principles and commitments' by which operators should develop their networks and that Local Planning Authorities should demonstrate their support.

Paragraph 18 of the Code of Practice sets out the principles and commitments that operators should follow when developing their networks inter alia:

- Site sharing and use of existing structures: make use of existing structures, sites and towers wherever possible to reduce the need for new development.
- Consultation with local planning authorities, local communities and other stakeholders.
- Standardised and high-quality approach to planning applications, and the notification procedure: provide standardised supporting documentation for planning applications (where appropriate) within the context of national and local requirements.
- Compliance with guidance laid out in the International Commission on Non-Ionizing Radiation (ICNIRP) public exposure levels guidance.

The Code of Practice also sets out the requirements of the LPA in relation to the deployment of digital infrastructure:

- Incentivising connectivity: support the expansion of telecommunications networks and take a 'joined-up' approach to the wireless infrastructure planning process, including ensuring that Local Plans effectively support the deployment of digital infrastructure.
- Facilitating sites: engage with operators when new sites have been proposed and discuss site requirements.
- Engagement with operators: respond positively to requests for engagement and make decisions in line with national policy and Local Plans. For planning applications, find solutions to issues and ensure timely decisions are made.

The added emphasis on support from Local Planning Authorities in the deployment of digital infrastructure is even more evident in the revised Code of Practice. The Code of Practice recognises the importance of collaboration and partnership to help drive network coverage across the country. It goes on to state that *"In all instances, it is important for all parties involved in the process to take a positive approach to consultation and engagement."*

## Local Planning Policy

### The Worthing Local Plan 2020 - 2036

The Local Plan was adopted in March 2023 and covers the planning process for the districts of Adur and Worthing. The following policies of the Local Plan are considered applicable to this case:

- Policy SPI: Presumption in Favour of Sustainable Development
- Policy SP2: Climate Change
- Policy SP3: Healthy Communities
- Policy DM6: Public Realm
- Policy DM8: Planning for Sustainable Communities/Community Facilities
- Policy DM10: Economic Growth and Skills
- Policy DM12: The Visitor Economy
- Policy DM13: Retail and Town Centre Uses
- Policy DM14: Digital Infrastructure
- Policy DM15: Sustainable Transport & Active Travel
- Policy DM24: The Historic Environment

The BT Street Hub project can improve aspects of the above policies. The economic benefit is facilitated through the interactive information service and can advertise local events/landmarks. Additionally, with the 5% advertising time designated to the Council, local events and updates etc. can be communicated through the Street Hubs.

By replacing old, dilapidated phone boxes with modern Street Hubs, the streets of Worthing can be decluttered and opened up for pedestrians, providing a more tidy feel and a better sense of place. BT Street Hubs are an efficient use of space on the street scene, providing multiple services within a small area of space.

During the pandemic, the BT Street Hubs throughout the UK acted as noticeboards for COVID restrictions and updates. This gave members of the public another medium for receiving updates and advice which allowed for more widespread and diversified coverage. Social inclusion was improved through this as members of the public without access (or limited access) to the internet were given an alternative option for receiving updates. Providing a free Wi-Fi service to the areas in which street hubs are installed helps equalise internet access to members of the public and helps people suffering from internet poverty utilise online services.

The BT Street Hub project provides the opportunity for sustainability through economic growth, social improvement and environmental consideration. The advertising opportunities that this project will bring can provide a local boost to the economy. All BT Street Hubs run off 100% renewable energy and use efficient LED lighting which dims at night to reduce usage.

The BT Street Hubs have been designed to be as minimal on the surrounding character and setting of the areas in which they are sited. The border of the main display consists of darker shades to soften the visual impact of each unit and to keep the impacts of amenity and setting to an acceptable level. Lighting is reduced at night to reduce the impact on light pollution and to keep from being an overbearing visual addition to the street scene. There is a frequent maintenance schedule for each unit wherein they are cleaned regularly and kept in working condition. Unlike the preceding phone boxes which have fallen into disrepair and accommodate anti-social behaviour, the new BT Street Hubs will act as a modern, clean and usable street furniture replacement. This proposal will be of a high-quality design and usability, directly improving town centre street scenes by replacing a dilapidated, and anti-social item of street furniture.

### **Policy SP1: Presumption in Favour of Sustainable Development**

- a) *Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in Neighbourhood Plans) will be approved without delay.*
- b) *Where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, the Council will grant permission unless:*
  - i. *the application of policies in the National Planning Policy Framework that protect areas or assets of particular importance provide a clear reason for refusing the development proposed; or*
  - ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole.”*

### **Policy SP2: Climate Change**

*A comprehensive and integrated approach to addressing climate change will be taken, consisting of the following elements:*

#### **Carbon Reduction**

- a) *Development proposals are expected to reduce the amount of energy used in construction and operation of buildings and improve energy efficiency, including retrofitting existing properties, to contribute to achieving zero carbon emissions.*
- b) *The Council will support and promote the creation of low carbon heating/ cooling networks and the delivery of renewable energy schemes.*
- c) *Developments should prioritise active travel such as walking, cycling and public transport to reduce reliance on the private car and facilitate car free lifestyles.*
- d) *Follow the waste hierarchy to minimise, reuse, and recycle waste during the construction phase and to encourage greater levels of recycling over the lifetime of the development.*

#### **Maximising carbon sequestration**

- e) *Incorporate green infrastructure such as street trees and other vegetation into the public realm to support rainwater management through sustainable drainage, reduce exposure to air pollution, moderate surface and air temperature and increase biodiversity.*
- f) *Achieve an overall net gain for biodiversity commensurate with the scale of the development, including a positive contribution to the habitat network through habitat protection, creation and enhancement.*
- g) *Maintain the current level of tree canopy cover across the borough and seek opportunities to increase appropriate species of woodland cover.*

#### **Climate Change Adaptation and Mitigation**

- h) *Development must be designed to adapt and mitigate the impacts of climate change and reduce vulnerability, particularly in terms of overheating, flood risk and water supply.*

- i) *Ensure buildings and infrastructure are designed to adapt to a changing climate, making efficient use of water, reducing impacts from natural hazards like flooding and heatwaves, while mitigating against and avoiding contributing to the urban heat island effect. This should include maximising opportunities for both natural heating and ventilation.*
- j) *The Council will seek adaptation and mitigation measures which improve the resilience of communities, reduce inequality and bring a range of social benefits.*
- k) *Development must not compromise land that is required to deliver towards a nature recovery network.”*

### **"Policy SP3: Healthy Communities**

*a) New development must be designed to achieve healthy, inclusive and safe places, which enable and support healthy lifestyles and address health and well-being needs in Worthing. In order to maximise opportunities to promote healthy lifestyles, where appropriate, new development must:*

- i. *improve the quality and quantity of open space, informal & formal recreation opportunities and multi-functional green infrastructure assets and networks;*
  - ii. *protect and enhance safe and accessible active travel routes and Non Motorised User Routes to enable exercise and physical activity as part of everyday life;*
  - iii. *provide high quality and energy efficient homes within an attractive environment, providing social connections through inclusive and accessible development layout and public realm design that meets the needs of all including those living with dementia;*
  - iv. *improve provision of and / or access to education, employment and skills training recognising the clear links between income and health;*
  - v. *improve environmental sustainability resilience and reduce contributors to poor health and mitigating their risks, such as those associated with climate change, flooding, hazardous uses, crime, noise and poor air quality to reduce inequalities and address climate justice;*
  - vi. *support healthy eating and promoting healthy food choices, through increasing opportunities for sustainable food systems such as community food growing spaces and green infrastructure within development and public realm spaces to enable healthy lifestyles.*
- b) The Council will support proposals for new and improved health services and facilities in locations where they can be accessed by sustainable transport modes;*
- c) Major residential and major commercial development must set out how they address the requirements of a) i - vi) as part of the planning application. In order to satisfy this policy requirement, applicants will be required to undertake a screening for a Health Impact Assessment (HIA). If necessary, a full HIA proportionate to the development proposed, will need to be prepared to demonstrate the health outcomes on the health and well-being of communities.”*

### **"Policy DM6: Public Realm**

- a) *The enhancement of the public realm in Worthing, particularly in the town centre and seafront, is an integral part of the strategic objectives for the town. New development in appropriate locations, integrated sustainable transport initiatives or regeneration schemes will be expected to improve the public realm.*

- b) *Proposals must ensure that the public realm is safe, accessible for all, inclusive, attractive, well-connected, easy to understand and maintain, and that it relates to the local and historic context. It is expected that new development will incorporate the highest quality design, landscaping, green infrastructure, street furniture and surfaces.*
- c) *Proposals for improvements to the public realm that have regard to the Council's Public Realm Strategy and Seafront Investment Plan will be supported.*
- d) *New shopfronts will be permitted where the design and materials respect the character of the area and of the building of which they form part.*
- e) *Express consent will only be granted for advertisements which respect the character and appearance of the surrounding area, and do not create a danger or hazard to public safety.*
- f) *The Council will support the delivery of public art that helps to enhance the public realm. Where appropriate, public art should be incorporated as part of any major development proposal."*

#### **"Policy DM8: Planning for Sustainable Communities/Community Facilities"**

- a) *The Council will support improvements to health, education, social, community and cultural facilities to ensure they meet the needs of local communities where it is demonstrated that there would be no unacceptable impact on the occupiers of adjacent properties.*
- b) *The provision of multi-purpose facilities and the sharing or extended use of facilities that can be accessed by the wider community will be encouraged.*
- c) *The Council will work with service providers to deliver appropriate facilities in accessible locations. Proposals by service providers for the delivery of facilities in appropriate locations to meet the needs generated by new development and existing communities will be supported in principle.*
- d) *The Council will seek planning obligations to secure new and improved community facilities and services to mitigate the impact of developments. The Council may also fund improvements to community facilities using receipts from the Community Infrastructure Levy.*
- e) *Development which would result in the loss of community facilities will normally be resisted and will only be permitted where:*
  - i) *an accessible replacement facility of a similar nature is provided that meets the needs of its current and intended users, as well as the local community; or*
  - ii) *it can be demonstrated that the existing premises are no longer required or viable in their current use and the premises have been appropriately marketed for an alternative community use."*

#### **"Policy DM10: Economic Growth & Skills"**

*The Local Plan will support, promote and enable the continued development of a strong, sustainable and diverse local economy by:*

- a) *identifying sufficient sites and premises in sustainable locations to meet identified needs of business;*

- b) *ensuring the availability of sufficient and suitable workspaces in terms of type, size and cost, to meet the needs of current and future businesses, including start up / serviced and incubator space;*
- c) *requiring supporting infrastructure and suitable environments for larger employers and small and medium sized enterprises;*
- d) *promoting a 'town centre' first approach to new office space;*
- e) *supporting the reinvestment, intensification and redevelopment of key employment areas to allow for upgraded and new floorspace;*
- f) *identifying employment renewal opportunities for under-utilised and vacant premises;*
- g) *making more efficient use of existing, underused and accessible employment sites;*
- h) *Supporting the development of tourism, leisure, sporting and creative industries with particular emphasis on the town centre and seafront locations;*
- i) *Supporting the improvement of digital infrastructure through the provision of digitally enabled sites, premises and facilities;*
- j) *Ensuring major development proposals demonstrate how they will contribute to addressing identified local skills shortage set out in corporate strategies. Opportunities should be taken to support local employment, skills development and training. The Council will negotiate on a case by case basis and where appropriate, secure such opportunities by use of a S106 legal agreement; and*
- k) *Applying conditions or legal agreements (where relevant and appropriate to do so) to any new development in order to control the proposed uses and allow for a managed approach to future proposals for change of use.*

#### **Policy DM12: The Visitor Economy**

- a) *The Local Plan supports the provision of tourism facilities, in particular those that would help to extend the tourist season; improves the quality of the visitor economy; meet the needs of visitors and the local community and are acceptable in environmental and amenity terms.*
- b) *Existing visitor attractions, facilities and accommodation should be retained unless it is demonstrated that the use is no longer required and the site is unlikely to be reused or redeveloped for visitor purposes. To demonstrate these requirements, the Council will apply tests set out below:*
  - i) *evidence of marketing actively conducted for a reasonable period of time;*
  - ii) *that alternative visitor uses have been fully explored;*
  - iii) *an appraisal indicating that the use is no longer viable;*
  - iv) *evidence that the site has not been made deliberately unviable;*
  - v) *evidence of the suitability of the site to accommodate the alternative visitor use; and*

- vi) *evidence that a reduction of floorspace or bed spaces in the case of visitor accommodation is the only way of improving the standard of the existing tourist facility.*
- c) *The Council will have regard to changes in the market, the economy and supply of visitor accommodation at the time of assessing an application.”*

### **Policy DM13: Retail and Town Centre Uses**

- a) *The Local Plan will support the vitality and viability of Worthing’s town centres by seeking to meet the identified floorspace needs for retail and other town centre uses up to 2026.*

#### **The Hierarchy**

*The Council will work with organisations and the local community to identify, protect and enhance the following hierarchy of vital and viable town, district and local centres.*

- *Worthing Town Centre Primary Shopping Area (comprising the Primary Shopping Frontage, Secondary Shopping Frontages and the Town Centre Seafront Area)*
- *District Centres (Broadwater, Goring and West Durrington)*
- *Medium Scale Local Centres (Findon Valley / Tarring Road / South Farm Road / The Strand / Thomas A. Beckett / Ham Road / Rowlands Road / The Mulberry)*
- *Small Scale Local Centres: (Aldsworth Parade / Boxgrove / Broadwater Street East / Limbrick Corner / Lyndhurst Road / Manor Parade / Selden Parade / Alinora Crescent / Broadwater Road / Salvington Road / South Farm Road (North) / South Street Tarring / Brighton Road / Dominion Road / Downlands Parade)*

#### **Applicable to all centres**

- b) *Changes of use and redevelopments within town, district and local centres will be carefully controlled to ensure that they support, rather than detract from, the successful functioning of the centres and their ability to meet local needs. according to their function in the hierarchy . When considering all such proposals regard will be had as to whether they would:*
  - i) *Make a positive contribution to the vitality, viability and diversity of the centre;*
  - ii) *Not unacceptably impact on daytime footfall;*
  - iii) *Maintain a strong role for the centre in providing a varied range of convenience goods and meeting other day-to-day needs;*
  - iv) *Positively restore and/or enhance the character and appearance of the frontage;*
  - v) *Maintain the continuity of active frontages;*
  - vi) *Be of a scale and type of use appropriate to the size and function of the centre, or part of the centre concerned;*
  - vii) *Ensure that any proposal will cause no significant adverse effects for the occupiers of neighbouring properties;*
  - viii) *Ensure that that there will be no severe negative impact on existing parking arrangements;*

- ix) Retain or re-provides ancillary facilities within individual premises, (such as loading, storage, staff or administrative facilities), unless it is demonstrated that these are no longer necessary for appropriate future use of the premises;
- x) Result in an over concentration of uses such as takeaways and other uses with closed and inactive street frontages. The Council will consider the role of the centre within which the proposal is located and other matters such as the numbers of existing similar uses within the frontage and any existing or potential issues. Permission will not be granted where harm to the vitality and viability of the centre, or the amenity of local residents and businesses, cannot be adequately mitigated; and
- xi) Require conditions to be applied to any new development where it is relevant and appropriate to do so, in order to control the proposed uses and allow for a managed approach to future proposals for change of use, in line with the Council's aspirations and strategies for the area.

### **Worthing Town Centre**

Spatial Policy SS3 (Town Centre) sets out the overarching development principles for the Town Centre and associated seafront and it is the starting point against which all proposed development in these areas will be assessed. The more detailed approach to frontages is set out below:

- c) **Primary Shopping Area (PSA)** - a wider range of main town centre uses will be encouraged to bring people into the town and generate footfall throughout the day. In considering the most appropriate locations for proposed uses, the Council will use the identified Town Centre Character Areas as a tool to help assess whether a specific proposal would give rise to harm to the individual character or vision for each character area. The following sets out the approach to ground floor frontages within the 'Primary Shopping Area':
  - i) **Primary Shopping Frontage (PSF)** - will be the focus for retail uses within the centre. The Council will seek to retain 65% of units in retail use to ensure that the centre retains its role as a sub-regional shopping centre and meets the shopping needs of the town's population. Uses such as Drinking Establishments and takeaways together with other uses that would detract from the overall shopping function of the frontage will be resisted;
  - ii) **Secondary Shopping Frontage (SSF)** - a wider range of uses will be supported provided they are active uses with active shop fronts that will enhance the vitality and viability and complement existing uses. However, uses such as takeaways and uses with closed and inactive street frontages will be resisted; and
  - iii) **Town Centre Seafront Area** - proposals that help to maintain and enhance an active and vibrant seafront will be supported. Eating, drinking and shopping together with appropriate cultural and leisure uses will be retained and encouraged. However, uses such as takeaways and uses with closed and inactive street frontages will be resisted, particularly where they cause or contribute to an over-concentration of such uses.
- d) Proposals that help develop and enhance the evening and night-time economy will be supported in the town centre where the operation of such activities can be controlled to address residential amenity implications and can demonstrate that such uses will add to the vitality and viability of the centre.

## **“District Centres and Local Centres**

- e) *The policy approach seeks to encourage convenient and accessible local shopping facilities that are of a scale appropriate to the role and function of the centre to meet day to day needs of residents, and contribute to social inclusion. When considering relevant proposals within these centres regard will be had to the following:*
- i) *In District and Medium Scale Local Centres - seek to retain a core of retail uses of at least 50% of the units in the whole centre, to ensure the role and function of the level of centre is maintained. Allow for uses such as financial and service and restaurant and cafes of an appropriate scale for the role and function of the centre. Other uses will be supported where it can be demonstrated that the use will enhance the vitality and viability of the centre in which it is proposed, generates footfall and retains an active shopfront with a shopfront display;*
  - ii) *In Small Scale Local Centres seek to retain primarily retail use and resist the introduction of other uses where they will cause demonstrable harm to the centre’s ability to meet day to day shopping needs of the local community; and*
  - iii) *In all District and Local Centres drinking establishments and takeaways uses will be considered on their merit, taking into consideration any negative cumulative impact of such uses on the centre, whether such uses add to the vitality and viability of the centre and the impact on residential amenity.*

## **Upper Floor Uses**

- f) *efficient and effective use of the upper floors that add to the vitality and viability of centres will be encouraged subject to:*
- i) *the proposed use of the upper floor will not undermine the viability of the unit on the ground floor particularly those retail uses;*
  - ii) *consideration will be given to the nature of the use, its appropriateness to the centre in which it is proposed, hours of operation, intensity of use and impact on nearby uses.*

## **Sequential and Impacts Tests**

- g) *Where development of main town centre uses is proposed on the edge of or outside of centres, the sequential approach as set out in the NPPF will be applied.*
- h) *Where retail, leisure or office development is proposed outside centres, an impact assessment will be required when development is above the following thresholds:*
- *retail, or a use that could change to retail without planning permission, over 500 sqm (gross);*
  - *leisure and office uses will be subject to the NPPF threshold - 2500sqm.*
- i) *Where necessary conditions and / or legal agreements will be applied to any permission accepted outside of defined centres, including defining the nature and extent of the proposed use to ensure no significant adverse impact on existing designated centres.”*

## **"Policy DM14: Digital Infrastructure"**

The Council supports the expansion and improvement of digital infrastructure. Applicants will be required to meet the following requirements.

### **Fibre to Premises**

- a) Development proposals will be expected to provide access to superfast broadband, as a minimum, and full fibre connections where available. This will include provision for multiple infrastructure providers to access the site.
- b) In locations where superfast broadband and full fibre connectivity are not currently available:
  - i. Applicants will be expected to demonstrate that they have held discussions with a range of providers to upgrade infrastructure to deliver superfast broadband or, where possible, full fibre connections;
  - ii. Where one or more providers have agreed to provide superfast broadband connectivity or full fibre, the development should be designed to connect to this service and make it available to occupiers; and
  - iii. Where no agreement can be reached to provide superfast broadband or full fibre connectivity at the present time, the development will be expected to incorporate additional dedicated telecommunications ducting to enable the provision of superfast broadband or full fibre connectivity in future.

### **New Telecommunications Infrastructure**

- c) Relevant proposals should demonstrate that:
  - i) the installation is the minimum required for the efficient operation of the network;
  - ii) all opportunities to make the most efficient use of existing telecommunication site have been explored fully such as: mast sharing, use of existing buildings or structures;
  - iii) no other suitable sites are available.
- d) All relevant applications for planning permission shall submit:
  - i) evidence that the proposal is the least environmentally harmful option;
  - ii) a statement that self-certifies that the cumulative exposure will not exceed the guidelines of the International Commission on Non-Ionising Radiation Protection (ICNIRP)."
- e) The location and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area/host building.

- f) Conditions or planning obligations may be used to secure landscaping as well as restoration of the site if operation ceases.”

### **Policy DM15: Sustainable Transport & Active Travel**

*In order to manage the anticipated growth in demand for travel, development proposals which promote an improved and integrated transport network, with a re-balancing in favour of non-car modes as a means of access to jobs, homes, services and facilities, will be encouraged and supported.*

- a) Worthing Borough Council will promote and support development that prioritises active travel by walking, cycling, Non-Motorised User routes and public transport, and reduces the proportion of journeys made by car. This will help to achieve a rebalancing of transport in favour of sustainable modes by:
- I) ensuring that new development is located in sustainable locations with good access to schools, shops, jobs and other key services by walking, cycling and public transport in order to reduce the need to travel by car;
  - II) ensuring that the design and layout of new development prioritises the needs of pedestrians, cyclists and users of public transport over ease of access by the motorist;
  - III) ensuring that new development minimises the need to travel and, where appropriate, incorporates measures to mitigate for any transport impacts which may arise from that development;
  - IV) requiring new development to provide for an appropriate level of cycle parking, car parking and electric vehicle space allocations that takes into consideration the impact of development upon on-street parking residential amenity, highway safety and has regard to West Sussex County Council standards / guidance;
  - V) promoting the provision of, and participation in, car club schemes; vi) requiring development which generates a significant demand for travel, and/or is likely to have other transport implications to;
  - VI) requiring development which generates a significant demand for travel, and/or is likely to have other transport implications to;
    - be supported by a Transport Assessment / Transport Statement and sustainable Travel Plan (in line with West Sussex County Council guidance and the NPPF);
    - contribute to improved sustainable transport infrastructure, including the provision of safe and reliable sustainable transport modes; and
    - provide facilities and measures to support sustainable travel modes.
  - VII) ensure new development contributes to the mitigation of air pollution, particularly in Air Quality Management Areas. New development should be located and designed to incorporate facilities for electric vehicle charging points, thereby extending the current network;
  - vii) Ensuring that new development does not unacceptably prejudice planned highway improvement schemes.

- b) *The local planning authority will work with West Sussex County Council and other relevant agencies to encourage and support measures that promote improved accessibility, create safer roads, reduce the environmental impact of traffic movements, enhance the pedestrian environment, or facilitate highway improvements. In particular, the local planning authority will:*
- I) support the expansion and improvement of public transport services;*
  - II) encourage improvements to existing rail services, new or enhanced connections or interchanges between bus and rail services, and improvements to the quality and quantity of car and cycle parking at railway stations;*
  - III) support the development of a network of high quality walking and cycling routes throughout the borough, including those identified in the Local Cycling and Walking Infrastructure Plan, including improved access across the A27, and railway line and better connectivity with the South Downs National Park and green infrastructure network;*
  - IV) support the development of key arterial cycle routes at: National Cycle Network Route 2; George V Avenue and Sea Lane and A24 Worthing Town Centre to Washington; phase I Findon Valley to Findon Village as identified in the WSCC Local Transport Investment Programme; and*
  - V) pursue ways of managing the impact of HGVs and implement measures as appropriate;*
  - VI) support improvements to the road network including the A259 and A27 and, as identified in the Worthing Local Plan Transport Study, provide appropriate mitigation measures to address capacity issues at a number of key junctions and road safety impacts on identified road links;*
  - VII) ensure the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code.”*

#### **Policy DM24: The Historic Environment**

- a) *Where development affecting any designated or undesignated heritage asset is permitted, it must be of a high quality, respecting its context and demonstrating a strong sense of place.*
- b) *Proposed development should take account of the information and guidance in Worthing’s Conservation and Heritage Guide (which will be updated and periodically reviewed).*

#### **Designated Heritage Assets**

- c) *Development should not adversely affect heritage assets or its setting (including important views that contribute to its setting). Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, the Council will refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm will be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. Where proposals may result in harm to a designated asset a Heritage Impact Assessment (HIA) must be submitted describing the significance of any heritage assets affected, including any contribution made by their setting.*
- d) *Planning permission and/or Listed Building consent will only be granted provided that the appearance, significance, or historic character of the Listed Building is not adversely affected. The reinstatement or*

replication of original features such as windows or doors will be supported. Materials used must be consistent with those originally used or typical of the locality. Change of use may be supported where this secures the retention of a building of historic architectural interest where it could otherwise be lost.

- e) Development in Conservation Areas will be required to be of a high standard of design and materials so as to respect, preserve and enhance the character and appearance of that area, and preserve important features. Conservation Area Character Appraisals will be used to assess applications within designated Conservation Areas and opportunities will be taken to preserve and enhance these areas, and to implement the recommendations of Conservation Area Management Plans. The importance to the local area of Buildings of Local Interest within Conservation Areas will be a material consideration in assessing an application for their demolition or development. Where, in compelling circumstances, the Council is minded to grant permission for demolition of a building in a Conservation Area, this shall not be granted until detailed plans for redevelopment have been approved.
- f) Planning permission to replace shopfronts of inappropriate design or materials, or in poor condition, in Conservation Areas will be granted providing the replacement is of appropriate design and materials, respecting the character of both the building and the Conservation Area. Advertisements in Conservation Areas should respect the character, proportions and design of the building on which it is displayed, and use traditional materials where necessary. Internally illuminated signs will generally not be permitted.

### **Undesignated Heritage Assets**

- g) The following locally listed heritage assets will be a material consideration when determining planning applications:
  - i) Buildings of Local Interest;
  - ii) Environmental Areas of Special Character;
  - iii) Parks and Gardens of Local Interest.

They have been identified for their contribution to the character of the area in which they are located as set out in Worthing's Conservation and Heritage Guide. Their importance to the local area and community will be considered, and account will be taken of the desirability to sustain and enhance their significance. Development proposals should respect, support, and where possible, positively contribute to the essential character of these heritage assets. Other buildings and features of design and architectural interest not included above may also be considered undesignated heritage assets and therefore will also be subject to these requirements. Where a development would result in harm to an undesignated asset, a balanced judgement will be made, having regard to the scale of any harm or loss and the significance of the asset. A HIA will be necessary to inform the decision.

- h) The Council will preserve archaeological features against damaging or discordant development. Such features should only be removed or altered in compelling circumstances where there is no practical alternative and where provision can be made for recording. Where a site includes, or potentially includes, heritage assets of archaeological interest, an appropriate desk based assessment will be required and a field evaluation where necessary.

BT Street Hubs provide a network service to the immediate area without the requirement for harsh, utilitarian street additions (e.g. Telecommunication Masts) while simultaneously acting as an advertisement, interactive tourist information hub, air quality monitoring hub with an ability to connect with emergency services. This proposal sensitively integrates telecommunications equipment through a valuable addition to the street scene. The Street Hub network will provide residents and visiting populations with an unprecedented suite of essential urban tools which offer the following key benefits:



- Make telephone calls for free
- Access local information and navigation via built-in screens on each side of the unit
- Charge electronic devices (phones/tablets) via built-in USB ports
- Access free ultra-fast Wi-Fi (up to 1 Gbps and 4/5G capabilities)
- An emergency button, allowing contact with the emergency services
- Public messaging capabilities

As outlined in the following section, the proposed Street Hub will provide the Local Authority with valuable environmental data to assist the Council in their own green agenda and is considered to assist the Authority in shaping the planning system.

The application site is positioned just outside the Broadwater Conservation Area and within proximity of a situated outside a Grade II listed building. As a result, further details are included within the heritage statement which forms part of this document.

### **Pre-application advice**

Due to the minor scale of the proposed development and in an effort to move the project forward as efficiently as possible, we have not undertaken any pre-application consultation in this instance. However, BT are keen to ensure that communication channels remain open over the course of the application to address any unforeseen issues.

### **Planning History**

No planning history has been identified for a similar proposal within the area, however advertisement consent has been granted for the deployment of fascia signs within the vicinity, including application reference numbers:

- AWDM/0784/21
- AWDM/0899/18
- AWDM/0471/18

### **Relocation**

In this instance the proposed Street Hub has moved slightly away from the position of the nearest associated BT phone box to be removed. This was done to be more in keeping with the immediate street scene and improve pedestrian manoeuvrability along this stretch of pavement. Albeit a subtle change, the siting and appearance of the Street Hub is a clear improvement from the existing arrangement.

### **Siting Justification against Planning Policy**

At the conception stage, we have sought locations with wide pavements, and where a site's relationship with existing street furniture avoids undue proliferation of clutter.

It is appreciated that streets are ever-evolving environments, amidst society's changing connectivity demands. BT has a universal service obligation with Ofcom to provide a street level phone service, whilst the need for Wi-Fi and mobile coverage has increased significantly. In this respect we have tried to build a sequence of Street Hub sites wherever possible, so that this can improve the user connectivity experience as they travel through an area.

Likewise, as Street Hubs can provide the Council with valuable data with each unit housing environmental sensors that can monitor air, sound and light, we have tried to plan a sequence of Street

Hub sites along key routes, so that the information gathered can be better analysed. This free environmental data has its own dashboard and will help the planning system actively manage patterns of growth in support of national air quality objectives and will be a useful source of real-time data in the delivery of the Council's own green agenda. In a similar vein, Street Hubs have the capability to monitor pedestrian, cyclist, and vehicle movements, hence in building a strategic network of Street Hub units, it will help the Council to monitor and develop travel plans for the area.

The introduction of any form of development within a particular environment will always be, to some degree, a noticeable addition or change to those residents, businesses and regular passers-by found closest. However, it should be appreciated that the visibility of something that is new does not automatically result in an overwhelming adverse harm occurring.

In progressing new Street Hub sites, so far as practicable, we have sought to minimise the contrast between the development itself and its immediate environment through appropriate siting and design. The siting of each Street Hub has been considered having regard to the available footpath widths and the visual character of that particular street scene where the new Street Hub is proposed. With regards to its associated advertisement screens, thought has been given to its immediate context and public safety in terms of pedestrian and vehicular movements. The criteria have been adjusted where necessary on a site-by-site basis to account for local context and policy requirements when reassessing the site's suitability to accommodate a new Street Hub unit.

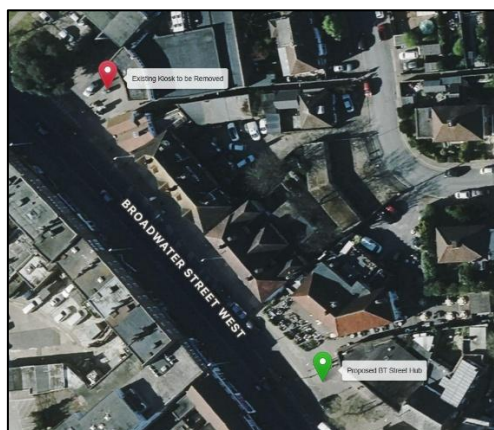
Justification for the siting and appearance of the proposed Street Hub has been assessed against up to date national and local planning policies and any other material considerations. Our assessment has concentrated on whether the removal of the existing BT call boxes when balanced against the replacement of a new Street Hub at the application site creates a significant visual harm as to outweigh the public benefits.

In this regard, matters of siting, appearance and advertisements are discussed as follows: -

### Siting

The proposal involves the installation of 1no. proposed new Street Hub at the application site. As previously highlighted at a strategic level, there are generally 2no BT call boxes removed with every Street Hub proposed. The removal of these existing call boxes will declutter street scenes throughout the authority and when compared with the footprint of the proposed Street Hub, will declutter pavements and free up space. In this particular case, an existing and outdated phone kiosk is to be removed from the pavement adjacent to Cricketers Parade, approximately 90 metres north-west of the application site.

**Figure 1** – Position of the application site relative to the existing kiosk to be removed



The proposed site is positioned near to the centre of Worthing and a location dominated by many commercial properties, shop fronts and signage. The application site is situated upon a particularly wide section of pavement, outside a Tesco Express supermarket and in proximity to a bar/restaurant. On the opposite side of Broadwater Street West (south side of the street), there is a two-storey building with retail units and shop fronts that line the pavement. The proposed Hub will sit perpendicular to the adjacent properties on both sides of the street and the screens built into each side of the unit will face in a north-west / south-easterly direction, along Broadwater Street West. In general, the area is busy with vehicle and pedestrian traffic.

The proposed site will be positioned adjacent to other street fixtures including cycle racks and a tree. The proposed unit will sit in line with the existing cycle racks and tree. The position of the installation will maintain visual consistency with existing street furniture. The removal of the existing phone kiosk from the Cricketers Parade will enhance the overall functionality of the public realm.

## **Appearance**

The proposed BT Street Hub unit is an advanced, modern development which has been designed following significant improvements in technology and digital content over recent years. It can promote the image of the authority as a vibrant place, and we believe it will improve the quality of the immediate streetscape for residents, businesses and visitors to the area.

The proposed design is slimmer and takes a more compact profile than a conventional phone box, which many of these units are replacing. The user interface is located at a low level and is a similar height to an existing BT payphone unit to ensure that it is accessible to all users.

The appearance of the BT Street Hub unit has a vertical emphasis and by reason of its reduced footprint, will give a slender more elegant form of development when compared to an existing payphone unit. The appearance of the structure is not considered to be harmful to the wider street scene, especially when taking into account the nature of the existing payphone to be removed. As a result, we consider the appearance of the area and street scene will be improved by the proposed new unit.

The new structure will sit within a commercial setting and busy stretch of road that is dominated by vehicular and pedestrian movements; hence it is well-lit throughout the day. While it is accepted that the BT Street Hub advertisements will be more visible during the hours of darkness or in dull conditions, its appearance will not be out of keeping with this stretch of road which is well lit by streetlights, window displays and headlights. In this context, the BT Street Hub design will not appear detrimental to the amenity of this particular stretch of Broadwater Street West. As already mentioned, the area already features other advertising signage, namely company branding which is annexed to commercial properties on both sides of the street.

It is concluded that the design of the proposed Street Hub is justified, and its appearance is an improvement when compared to the BT call box that is to be removed as part of the proposed scheme. Overall, we considered the appearance of the proposed Street Hub is acceptable and in accordance with national and local planning policies.

## **Pavement Width**

The existing pavement at this location is over 8.5 metres wide. The total width of the Street Hub is 1.236 metres. The Street Hub will be positioned over 3.7 metres back from the kerb, retaining a clearance of just over 3.6 metres between the unit and the adjacent shop front (Tesco Express), maintaining the clear and safe passage of pedestrians. It is of note the structure only has a depth of 350mm, so any minor narrowing of the footway will occur for just a few centimetres.

## Advertisements

When seen in the overarching context of the street scene, it is considered that the location, size and height of the digital advertisement panels will on balance be acceptable. As previously discussed, it is believed that the siting and appearance of the BT Street Hub will not create significant harm to the amenity of the area that will outweigh the public benefits and other material factors of consideration.

In terms of public safety, the site of the BT Street Hub and the display of digital advertisements on its sides will allow for the continued safe movements of motorists and pedestrians. In this regard, its presence within the street scene will not endanger public safety of those people who are taking reasonable care for their own and others' safety.

It is recognised that all advertisements are intended to attract people's attention, however in this case their siting and size will not create an untoward feature within the street scene. The proposed position of the BT Street Hub and orientation of the advertisements in relation to the road will not cause unacceptable interference with nearby road signs and or navigational lights. Viewed within the street scene setting, the digital advertisements shall be seen by passing motorists but not create confusion nor influence the behaviour of drivers to such a degree that they cause a hazard by reason of their presence. The proposed Street Hub will be sited away from road junctions and kept in line with other pavement fixtures so as not to unduly interrupt any visibility splays or sightlines. When viewed within the street scene context of the wider environment, it is not considered that the Street Hub will appear as an untoward feature to passing motorists.

Regarding pedestrian safety, the Street Hub is positioned away from the road edge on a particularly wide section of pavement without impeding pedestrian movements as ample footway width will be retained. Allowing for the orientation of the BT Street Hub's user interface in relation to passing motorists, the public safety of those using it will not be put at risk as they shall be set well away from the kerb edge.

As already detailed, the area surrounding this specific site is visually busy, while the installation itself will be set to the front of and within proximity of many retail premises and shop fronts, including other signage such as the Tesco Express.

The proposed usage for the screens has been set in accordance with Schedule 1 of The Town and Country Planning (Control of Advertisements) (England) Regulations 1984:

1. Any advertisements displayed, and any site used for the display of advertisements, shall be maintained in a clean and tidy condition to the reasonable satisfaction of the local planning authority.
2. Any structure or hoarding erected or used principally for the purpose of displaying advertisements shall be maintained in a safe condition.
3. Where an advertisement is required under these Regulations to be removed, the removal shall be carried out to the reasonable satisfaction of the local planning authority.
4. No advertisement is to be displayed without the permission of the owner of the site or any other person with an interest in the site entitled to grant permission.
5. No advertisement shall be sited or displayed so as to obscure, or hinder the ready interpretation of, any road traffic sign, railway signal or aid to navigation by water or air, or so as otherwise to render hazardous the use of any highway, railway, waterway or aerodrome (civil or military).

The Transport for London's (TfL) policy document 'Guidance for Digital Roadside Advertising and Proposed Best Practice – 2013' [the TfL Guidance] has also been a key document in the design and site selection process.

In addition to the above conditions, each Street Hub location has been assessed against and comply with the following additional criteria from the TfL Guidance.

- There would be no conflict with any traffic signs, signals, crossing points, schools, hospitals or low bridges.
- No sightlines or clearances would be affected.
- The TfL guidance states that 'Static digital advertising is likely to be acceptable in locations where static advertising exists or would be accepted.' There is existing traditional advertisement on similar sections of the respective roads in many cases.
- The geometry of the roads is not complicated, and the driving conditions are not considered to be demanding or complicated.
- The advertisements would not be experienced by a driver in conjunction with any other similar digital advertisements.
- As per the TfL guidance, the advertisements would be located as close to the driver's natural eye line as possible and facing as head-on to the traffic as is practical.

The lighting levels noted above are within the levels set for this type and size of screen (those under 10m<sup>2</sup>) as set by the Institute of Lighting Professionals, Professional Lighting Guide 05: The Brightness of Illuminated Advertisements (2023). A copy of this document is appended for clarity.

## Noise Management

As one of many features, Street Hubs provide free phone calls via a speaker and microphone system. The following document identifies the steps we are able take to ensure that these calls, like all the features of the Street Hub, help improve the amenity of a local area whilst also respecting the expectations of local community over time. Please note: this noise management plan refers specifically to the noise from the Street Hub. Noise from pedestrians, users of the Street Hub, or from other nearby sources are not included and would typically be considered matters for the Police and other authorities who have the appropriate and relevant powers to act on such issues if necessary.

We have designed our Street Hub so that they create a 'sound cloud' for the person making a call with noise levels sufficient to make calls with background noise for the surroundings. Whilst this generates a reasonable conversational volume in proximity to the Street Hub, it is intended to result in minimal to no noise being noticeable further away. The average volume settings are 65dB average at 3m distance from each Street Hub. Users may also choose to use headphones when making calls or using the tablet, which deactivates the speaker for the duration of their use.

It is worth noting that the Street Hubs are situated on public streets, in the most part close to roads where high volumes of traffic will be seen, examples of background noise experienced on streets are details below:

| Noise Level, dB | Example                          |
|-----------------|----------------------------------|
| 60-70           | Conversational Speech            |
| 70-80           | Average traffic on Street Corner |
| 80-90           | Heavy lorries at 6m              |

## Daytime (07:00 – 21:00)

Street Hub have controllable volume levels. This will default to 50% at the start of any user activity during the day and can be increased and decreased based on the preferences of the user.

## Nighttime (21:00 – 07:00)

Between the hours of 21:00 to 07:00 all Street Hub will be governed so that the volume cannot be increased to greater than 60% of the maximum volume.

## Exceptional Circumstances

We manage noise by exception based on feedback from users and the local community. If we receive any feedback that the Street Hub may be causing detrimental environmental impact, we take the following actions:

1. Understand the reason for the issue and any extenuating circumstances. At this point we will separate out any Police or community safety matters and work directly with the relevant authorities, and support the local residents in raising these issues through official channels where appropriate.
2. We will then verify the evidence provided against the Street Hub's call history and other operational data as required. This will allow us to understand the number, time, and frequency of outbound calls being made and better understand the severity of the reported situation.
3. Once we have verified the situation, we will typically look to apply local bespoke volume governor controls appropriate to the situation. We have found that reducing the Street Hub's maximum volume to 40% during relevant periods tends to resolve issues where they have been identified.
4. We will continue to monitor the situation and listen to ongoing feedback from the community as we do take matters seriously. We continue to learn as part of our roll out how Street Hubs are fitting into the community.

## Further information

We want each Street Hub to provide the best possible experience for users and the communities around them, and will continue to work with councils, police, and the wider community to make sure they do. For more information on Street Hubs and how they are managed, please contact [streethub@bt.com](mailto:streethub@bt.com).

## Heritage Statement

It is important to note that the application site is positioned just outside the Broadwater Conservation Area which seeks to protect the outstanding architectural, historical and cultural importance of this part of the town. The site is also situated approximately 35 metres from the boundary (grounds) of Broadwater Parish Church, a Grade I listed building (listing reference: 1025810). Another feature within the grounds of the church, including section of wall on the north side of Broadwater Churchyard is also listed – Grade II listed (listing reference: 1025811). A further property known as 4-8 Broadwater Street East is Grade II listed – (listing reference: 1250165).

In terms of impact to the church, due to the geographical distance between the proposed Street Hub and building itself (a distance of 70+ metres) and the presence of intervening features, it is considered there will be minimal impact to the property. In relation to the boundary wall and 4-8 Broadwater Street, again, due to the scale of the proposed Hub, the geographical distance between the Hub and these assets (a distance of approximately 35+ metres) and the presence of intervening features, including other street furniture and tree, it is again considered that any impact will be minimal.

**Figure 2** – Position of the application site relative to listed assets



As already stated, the local area is a busy and features many commercial premises that have a high level of pedestrian and vehicular traffic. Due to the scale of the surrounding buildings, at 2.98m in height, the Street Hub will benefit from being shorter than most of the surrounding street furniture and when viewed from a modest distance, will blend into the aesthetics of the street scene which features a number of shop fronts, including the adjacent Tesco Express.

It is accepted that there will always be challenges faced in finding a balance between limiting any visual harm created by the siting of development upon heritage assets when weighed up against the public benefits it will bring to the area. When seen in perspective within the street scene, it is considered that the proposed siting and orientation of the BT Street Hub, will not appear incongruous or have a significant material impact on the setting or views of the Conservation Area. It is ultimately considered that any minor harm upon the aforementioned heritage assets will be outweighed by the significant public benefits of the Street Hub in what is a vibrant part of the town and which is already dominated by modern shop frontages and an array of street furniture. Furthermore, the proposed scheme involves removing an outdated and much larger phone kiosk, which we consider will significantly enhance the area.

## **Conclusion**

BT Street Hubs have the potential to significantly enhance the provision of local community communications facilities and services. It is precisely the type of high-speed digital infrastructure that the government is seeking to support as part of the presumption in favour of sustainable development. It will deliver social, economic, and environmental benefits by providing a suite of essential urban tools/services, including free ultrafast Wi-Fi to residents, businesses and visitors in this area. Overall, BT Street Hubs will help future proof the high street making them smarter, safer, and more sustainable through their adaptable design and function.

The proposed BT Street Hubs structures are of a high quality, accessible design that will be a significant improvement when compared to the existing payphones that shall be replaced. Modern signage which is interactive and multi-faceted in its use has become more acceptable on the street scape due to its functionality, clean and modern look. We consider the proposal in this case to be appropriately sited; to reduce street clutter, to improve available footway widths, not to negatively affect heritage assets nor adversely affect amenity or public safety.

We consider this statement demonstrates the BT Street Hub proposal is in accordance with national policy set out in the NPPF and local development plan policies, in which we hope this application can be supported by your Council.

## **Planning Conditions**

To give assurance that each Street Hub will operate as intended and the associated payphone removals will occur, we would be pleased to accept the following conditions or a mutually agreed version of them to be included as part of any planning consent:

- a. The pavement surrounding the Street Hub shall be made good to the same condition as the adjacent land.
- b. The intensity of the illumination of the two digital display screens shall not exceed 600 candelas per square metre (cd/m<sup>2</sup>) between dusk and dawn in line with the maximum permitted recommended luminance as set out by 'The Institute of Lighting Professional's 'Professional Lighting Guide 05: The Brightness of Illuminated Advertisements'.
- c. The digital display screens shall not display any moving, or apparently moving, images (including animation, flashing, scrolling three dimensional, intermittent or video elements).

- d. The minimum display time for each piece of content on the digital display screens shall be 10 seconds.
- e. The interval between each piece of content on the digital display screens shall take place over a period no greater than one second; the complete screen shall change with no visual effects (including swiping or other animated transition methods) between displays and the display will include a mechanism to freeze the image in the event of a malfunction.
- f. No content on the digital display screens shall resemble traffic signs, as defined in section 64 of the Road Traffic Regulation Act 1984.

Should your department wish to append any other conditions to either the full planning or advertisement application, we would be most grateful if you could discuss these with us at your earliest opportunity during the course of the determination process.