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**Adur & Worthing Council**
**Planning Department**
**Worthing Town Hall**
**Chapel Road**
**Worthing**
**BN11 9SA**

**23 September 2026**

**Town and Country Planning Act 1990**
**Town and Country Planning (Control of Advertisements) (England) Regulations 2007**

**Re: The Installation of Four Advertised Communication Hub Units with Defibrillators.**

**Application Sites:**

1. **Pavement o/s Waitrose, High Street, Worthing BN11 1LL**
2. **Pavement o/s 54 South Street, Worthing BN11 3AA**
3. **Pavement o/s 31-35 Montague Street, Worthing BN11 3BE**
4. **Pavement o/s 45-47 Montague Street, Worthing BN11 3BN**

This letter is submitted with applications for advertisement consent (AC) and planning permission (PP) for the installation of four Communication Hubs across the centre of Worthing. The set of applications relate to four sites, as identified on the map of the Worthing at **Appendices A**, respectively. The Hub Unit, in addition to free calls to landlines, offers a range of additional connective functions that include free Wi-Fi, a 32-inch touch screen to enable wayfinding, direct access to local webpages, a publicly accessible defibrillator and both USB and wireless device charging capabilities. The communication apparatus includes a telephony element together with an advertised face, which is why applications are submitted for both PP and AC.

## Background

By way of background on this proposal, JCDecaux purchased a telephone Company called In Focus Public Networks (IPN) in 2018 and with it a network of old-style enclosed call boxes. Over the last few years we have been systematically working in partnership with IPN to rationalise and replace the call box estate with modern multifunctional Hub units, of which there are now over 400 in the UK. What is unique about our Hub unit is the inclusion of a publicly accessible defibrillator as a standard feature in the unit design.

This letter therefore sets out the details of the proposals, which seeks approval for a limited number of units to create a central network of connected Hub units that offer a range of interactive functions that are available free of charge to the public. The details of the Communication Hub unit are enclosed at **Appendices B and C** and the proposed locations shown on the map in **Appendix A**.




**Greater Manchester Police Crime Awareness Campaign on Piccadilly, Manchester**

## Hub Unit Features

Common to all communication providers is an advertised element, from which is derived the revenue to pay for the provision and maintenance of the equipment and support any services provided. Our Hub unit is the only unit that incorporates a single side of advertising rather than having it featuring on both sides of the structure. This enables us to dedicate the front of the unit solely to public use, as a purposefully designed benefit, rather than an afterthought.

The traditional role of the phone box is ill equipped for the modern digital environment. The multifunctional Hub unit has been designed to bring this public service up to date and present the next generation of communication provision that gives more to the public and can contribute to the vitality and vibrancy of city centres.

The available benefits include free calls to landlines[1] and charities, free wi-fi and device charging, wayfinding via the 32" touchscreen and instant access to the emergency services when needed.

However, one of the most important features is the inbuilt defibrillator, which is accessible 24 hours a day. Since 2019 JCDecaux has worked in partnership with Community Heartbeat Trust, a registered charity that promotes greater public access to defibrillators in public spaces. Each Hub unit is equipped with a defibrillator as standard and local training is provided by the Community Heartbeat Trust, funded by JCDecaux, to ensure that the equipment can be quickly deployed in an emergency.




**Communication Hub Renders**

The detail in **Appendices B** and **C** covers some of the potential functions that can be provided by the Hub unit and which are currently being trialed in other Cities and Boroughs. These include air quality sensors through our collaboration with Airly[2]; pedestrian flow monitoring to enable Councils to better understand people movements and flows within their area; in built CCTV cameras to supplement local provision. Technological advances are driving the development of a range of functions that can be incorporated into street furniture to enable local authorities to better understand and plan for changes in the urban environment. All these capabilities are funded by the advertising revenue from the single display on the Hub unit, 50p in every £1 of which is reinvested in furniture to support public services.

[1] Calls to Mobile Numbers prohibited under the adopted Management Plan
[2] https://airly.org/en/

The unit has undergone rigorous testing in extreme conditions and can boast 13.5mm thick anti-vandal toughened safety laminated glass on all glazed surfaces. The other external elements have been treated with a nanotech surface treatment to enable easy removal of stickers and/or sprayed paint to the external surfaces. The unit has a protection rating against impact of >IK10. All electrical circuitry is inaccessible to the public and the unit features hidden fixings that require specialist tools to enable access.

The advertisement screen will show illuminated static images that automatic change by means of a remote server. The light sensor will control lighting levels automatically during the day and be able to adjust levels to reflect a change in sunrise and sunset times from summer to winter and environmental conditions. Should the unit malfunction the screen will switch off and automatically alert JCDecaux's dedicated digital team of the fault and schedule a repair. The display screen on the reverse of the Hub unit will switch off between the hours of 11:59 p.m. and 6:00 a.m., thus reducing energy use by 43%. The touchpad screen will default to a map of the centre of Worthing for easy wayfinding and the screen can include shortcuts to the most often used apps and links direct to local Council services. A touchpad is positioned at 1m from the ground to provide easy access for wheelchair users and the screen is designed with high contrast colours to assist the partially sighted.

Finally, sustainability is an important element of the Company's approach to development from initial design, product and material sourcing to energy use. In 2019 the Company joined RE100, a global leadership initiative for companies committed to 100% renewable electricity. The Company's objective is to source 100% of its electricity consumption from renewable electricity this year. Although not an exhaustive set of criteria, I list below some of the important considerations in our proposals.

- **Need** – The NPPF confirms that the need for this type of communication apparatus is not a material consideration. However, evidence from installed Hub units in the UK clearly demonstrates not only the demand for phone functions, but the active use of the additional functions provided. The Hub unit is not limited to voice calls but includes access to a range of other facilities that are free for public use. The defibrillators on the Hub network have been used over 400 times in two years. The share of time of the display screens together with the dedicated local area specific content on the touchscreen provides a platform for people to engage with public bodies and promote public

awareness. The document appended as **APPENDIX D** shows the uses figures for the existing 13 Hub units in the centre of Leeds for 2023, which show a healthy and active use of the interactive unit.

The need for accessible defibrillators in public spaces is well known[3]. Cardiac arrest is a real issue in all communities with over 100,000 hospital admissions each year. A heart attack can happen to anyone and anywhere and the survival rate is just 1:10, however the early use of a defibrillator can triple the chances of someone surviving such an attack. Each Hub unit is equipped with an easy to use defibrillator provided and maintained by JCDecaux and added to the register of available devices in the Borough. How to activate and use to the device can be displayed on screen and local training can be organized through CHT funded by JCDecaux, to ensure that when needed, this equipment can be quickly deployed to save a life.

- **Design** – The Hub unit is based on the Forum design by Fosters and partners and is a familiar scale of furniture that is found in urban areas as it is comparable to the size of advertising on bus shelters, for example. The design is purposefully understated in a dark grey or black colour to match other functional furniture within Worthing and is of robust construction and fully accessible. The units are run on 100 renewable energy and cleaned by rainwater.

- **Unit Number and Clutter** – The proposal is limited in scope to four new locations, which is a suitable scale of network for the size of the district of the centre of Worthing. We have identified sites to fit the distribution and where possible sited them on footpaths that are relatively clear of other similar forms of furniture.

- **Safety** – The experience of other Operators across the UK has raised real concerns over the misuse of a free to use public service. The design and operation of the Hub unit has been formulated with the support of the Met Police Design Out Crime Unit resulting in the adoption of a Management Plan that ensures the use of the units is closely monitored and managed to prevent abuse.

[3] https://www.gov.uk/government/news/number-of-defibrillators-to-be-increased-with-new-funding

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## The Proposal Sites

The proposal for Worthing Borough Council is for four units as illustrated in **Appendix A**. There is no current proposal to grow this size of estate however we are open to discussion through the application process on the precise locations should any of the identified sites be considered unsuitable for local amenity or highway safety reasons. The site locations sit within established retail streets and share comparable backdrops of retail/commercial activity. The sites are considered suitable locations for this type of development, based on the surrounding character and building scale.

## Heritage Statement – South Street Conservation Area

The South Street Conservation Area covers part of Worthing's historic town centre, including the east end of Montague Street, South Street and adjoining streets which reflect the town's late-18th- and early-19th-century expansion as a seaside resort. The character of the area is defined by a close urban grain of mainly Georgian and Victorian buildings, traditional façades above active ground-floor shopfronts, and a busy pedestrian environment where retail, café and service uses dominate. Modern public-realm surfacing, lighting, signage and street furniture have been introduced over time as the town centre has adapted to contemporary shopping and leisure, but the historic street pattern and overall scale of buildings remain clearly legible.

The proposed JCD Communication Hubs are located on the pedestrianised sections of Montague Street, and South Street, nearby to established retail frontages that already accommodate a range of contemporary street furniture such as lighting columns, bollards, wayfinding, benches and public transport infrastructure. The significance here is townscape-based, arising from the continuity of frontages, historic plot pattern and the role of these streets in linking the commercial core to the seafront.

The key consideration for proposals of this nature within a conservation area is the effect on its special architectural and historic interest and on general visual amenity. The Hubs would be experienced within an already modernised environment and would be positioned wholly within existing pavement space. Their modest height, slim profile and simple contemporary design ensure that they remain clearly subordinate to surrounding façades, do not obscure architectural detailing or alter historic building lines, and do not intrude into important views along South Street or towards Montague Street and the seafront.

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The proposed Communication Hub on South Street is positioned around 20 metres east from Lloyd's Bank (LB 1250548) and set perpendicular to its principal elevation, so it sits within the general pedestrianised streetscene rather than directly in front of the listed façade. Its modest scale and simple contemporary form mean it would remain clearly secondary to the bank building, avoid obscuring key architectural features, and allow Lloyd's Bank to continue to read as the dominant heritage element in this part of the South Street Conservation Area.

Contemporary structures and infrastructure are often introduced into historic town-centre streets where they are of high design quality, appropriate scale and sensitively sited, without undermining the essential character of the area. In this case, the proposed JCD Communication Hubs, designed as restrained, high-quality items of street furniture, are considered capable of integrating into the Montague Street, and South Street streetscapes without detriment to the character or appearance of the South Street Conservation Area, and with potential to support the ongoing function and vitality of the town centre through the information and services they provide.

## Material Considerations

The proposal requires both Planning Permission for the physical elements and communication apparatus and Advertisement Consent for the display of advertisement on the rear of the Hub Unit. In respect of the advertisement element the Regulations dictate and limit the scope of the considerations to matters of amenity and safety, whereas the communication element is considered under Council's plan policies.

## Policy Considerations – National Guidance

**National Planning Policy Framework** (NPPF) December 2023

- Part 6 Building a strong, competitive economy
- Part 10 Supporting high-quality communications
- Part 12 Achieving well-designed and beautiful places

**Planning Practice Guidance** ("PPG")

- **Advertisements July 2019**
  - Section 7 Public Safety Considerations
  - Section 8 Amenity Considerations
- **Healthy and Safe Communities Aug 2022**

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The National Planning Policy Framework December 2023 (**NPPF**) sets out the Government's planning policies for England and how these should be applied. The updated NPPF maintains the role of the planning system in supporting sustainable forms of development.

Advertising plays an important role in a diverse and vibrant market economy by encouraging consumer confidence and spending, which contributes to sustainable economic growth. Advertising is also an essential support for business through the promotion of products and services which drives consumer spending. The use of land for advertising is therefore consistent with the aim of sustainability and its support for a viable market economy. In respect of outdoor advertising the NPPF states that;

> "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."

Part 6 of the NPPF emphasises the role of the planning system in encouraging businesses to invest, innovate and adapt to changing market needs. Part 10 covers the essential role a high-quality communications infrastructure has on the delivery of sustained economic growth and how the planning system should act to support such development. Paragraph 118 states:

> "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) and full fibre broadband connections. 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; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution)."

Furthermore paragraph 122 confirms:

> "Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system…"

Part 12 covers the importance of design in managing and improving spaces and the quality of place. The design of all built form, including street furniture, must be sustainable and functional but also attractive and include innovation in the design evolution. Paragraph 131 says:

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> "Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities."

On design, the Framework states that:

> "Planning policies and decisions should ensure that developments:
> f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience."

And that significant weight is given to:

> "outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings."

The proposed Hub unit is therefore supported by the policy aims of the NPPF.

**Worthing Local Plan (2020-2036)**

The Worthing Local Plan, adopted on 28 March 2023, provides the spatial strategy for the borough, guiding how land will be used for homes, businesses, retail, transport, community facilities and green infrastructure, and setting a vision for a sustainable, well-connected coastal town. Within this framework, modern digital connectivity is an important part of the infrastructure needed to support local economic activity, access to services and the continued vitality of Worthing's town centre.

The proposed Communication Hubs accord with the Local Plan's objectives for town centre regeneration and infrastructure by introducing high-quality, multipurpose street units within existing public spaces in Worthing town centre, improving access to information and online services without adding unnecessary street clutter. By enabling community Wi-Fi and free internet access in busy public locations, the hubs help strengthen Worthing's role as a focus for shopping, services, culture and tourism. These measures support the Plan's economic, social and environmental objectives and contribute to tackling the digital divide by offering inclusive access to high-speed connectivity at the heart of the borough.

**Amenity**

In this proposal we have been mindful of the respective local contexts and feel that a limited network of Hub units in locations where the scale of buildings and character of the areas are appropriate and unlikely to lead to harm to the appearance or character of the street setting. The design of the Hub unit and scale of advertisement display is appropriate to the pedestrian environment without overwhelming passers-by. The proposal sites are confined to the main retail

centres within Worthing which are vibrant and busy routes where the immediate local context could support this type of modern structure. Overall, the Proposal would accord with policy guidance and is considered not to harm local visual amenity.

**Public Safety**

The advertisements affixed to the Hub units will be prominently positioned on the public footpath to be readily visible. While the proposals would be visible to drivers, the main audience will be pedestrians. The proposal sites have been chosen where the width of the available footpath is sufficient to accommodate the unit without obstruction or an unacceptable narrowing of the available pavement. The units will be seen alongside busy active street frontages and so it is doubtful that anyone would view this type of advertised unit in this context as unusual or alien.

**Conditions**

The mechanism exists within the planning system to provide a level of control over the manner and use of roadside advertising in the interest of amenity and safety, as expressed in the Regulations. All consents for express advertisement consent are covered by the standard conditions set out in Schedule 2 to the Regulations. It is proposed that the following special conditions should be applied to any advertisement consent:

- The intensity of the illumination of the signs shall not exceed 300Cdm$^2$ from dusk till dawn
- Any change in advertisement display shall be instantaneous
- The displays shall not display any moving, or apparently moving, images
- The advertisements displayed on each panel shall not change more frequently than once every 10 seconds.

The above special conditions are now used as best practice for the control of digital advertisements, having been originally proposed by Transport for London (TfL) in relation to applications adjacent to the strategic road network. Digital technology is by its nature a more sustainable and versatile method of displaying images and messages in real time and in cases of emergency. JCDecaux fully accepts that this functionality could and should be used to create safer streets and places. We are therefore committed to working with local authorities to ensure our apparatus is designed and used in a way that assists in reducing crime.

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The Management Plan at **APPENDIX E** has been formulated with the assistance of the Police Designing Out Crime unit and forms part of the application documentation, as does the Company's commitment to work with the Police and adaptive to changes in Borough Policing.

**Summary**

The UK is currently at the forefront in the development of multifunctional digital furniture and the provision of accessible communication apparatus that provides more than simply a means to make voice calls. Many cities recognise the value such development can provide, which complements and support their public service provision and delivery. The proposed Hub network has been thoughtfully considered to ensure it will successfully integrate into the urban fabric of Worthing town centre.

The proposed unit is of a high quality of design and the locations are confined to commercial areas that are appropriate for this type of advertised structure. The design and functions of the Hub unit will contribute to raising the quality standard of furniture and the appearance of the public realm.

I trust that the above information and Appendices provide sufficient information on our plans and is enough for you to consider this proposal. I am happy to meet if needs be at your offices or ours to discuss the finer detail.

I look forward to hearing from you.

Yours sincerely,

[redacted]

**Stephen Herraghty MRTPI**
**Senior Town Planner**
**JCDecaux UK**