



DELEGATED APPLICATIONS - ASSESSMENT SHEET

APPLICATION NO./ADDRESS:

DC/26/0119

Land at 516852 130723, Freshwater Parade, Bishopric, Horsham, West Sussex,

DESCRIPTION:

Installation of 1No. BT Street Hub Unit and associated advertisement panels on either side of the unit.

RELEVANT PLANNING HISTORY:

DC/26/0120	Installation of 1No. BT Street Hub Unit and associated advertisement panels on either side of the unit.	Application Refused on 09.07.2026
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RELEVANT PLANNING POLICIES

The National Planning Policy Framework (NPPF)

Horsham District Planning Framework (2015):

Policy 1 - Strategic Policy: Sustainable Development
Policy 2 - Strategic Policy: Strategic Development
Policy 3 - Strategic Policy: Development Hierarchy
Policy 5 - Strategic Policy: Horsham Town
Policy 7 - Strategic Policy: Economic Growth
Policy 12 - Strategic Policy: Vitality and Viability of Existing Retail Centres
Policy 14 - Shop Fronts and Advertisements
Policy 25 - Strategic Policy: The Natural Environment and Landscape Character
Policy 32 - Strategic Policy: The Quality of New Development
Policy 33 - Development Principles
Policy 34 - Cultural and Heritage Assets
Policy 35 - Strategic Policy: Climate Change
Policy 36 - Strategic Policy: Appropriate Energy Use
Policy 39 - Strategic Policy: Infrastructure Provision
Policy 42 - Strategic Policy: Inclusive Communities

Horsham Blueprint Business Neighbourhood Plan (HBBNP) 2019 - 2036:

Policy HB3 - Character of Development
Policy HB4 - Design of Development
Policy HB7 - A Welcoming Public Realm (Advertisements)

Horsham District Local Plan (2023-40) (Regulation 19):

Strategic Policy 1: Sustainable Development
Strategic Policy 2: Development Hierarchy
Strategic Policy 4: Horsham Town
Strategic Policy 6: Climate Change
Strategic Policy 7: Appropriate Energy Use
Strategic Policy 8: Sustainable Design and Construction
Strategic Policy 9: Water Neutrality
Strategic Policy 12: Air Quality
Strategic Policy 19: Development Quality

Strategic Policy 20: Development Principles
Policy 21: Heritage Assets and Managing Change within the Historic Environment
Policy 22: Shop Fronts and Advertisements
Strategic Policy 23: Infrastructure Provision
Strategic Policy 27: Inclusive Communities, Health and Wellbeing
Strategic Policy 35: Town Centre Hierarchy and Sequential Approach
Strategic Policy 36: Town Centre Uses

REPRESENTATIONS AND CONSULTATIONS RESPONSES

Where consultation responses have been summarised, it should be noted that Officers have had consideration of the full comments received, which are available to view on the public file at www.horsham.gov.uk

Consultations:

HDC Conservation: The Bishopric forms one of the historic routeways into Horsham and was originally within the gift of the Archbishop of Canterbury. It held a weekly market and the echo of this use has been carried through to the present day. Whilst it is noted that the location of the proposed hub is not within a conservation area, it is within the wider setting of the listed buildings on the northern side of the road.

Although the structure would be viewed against the modern shopfronts there is a concern at the increase in paraphernalia on the pavement. The incremental increase in signage, bins, telecoms cabinets etc all result in clutter within the streetscape which is essential to maintain a sense of place. The NPPF refers to the importance of good design being a key aspect of sustainable development and establishing a strong sense of place that is attractive and welcoming.

The ad hoc addition of infrastructure can result in the placing of equipment for the convenience of operators which is understood, however by taking an individual approach the appearance of the streetscene can become muddled. The proliferation of generic coloured cabinets, bins, signs and advertisements without a holistic approach risks creating a street that becomes confusing and detracts from the attractive qualities of the locality.

It would therefore be suggested that consideration is given to how the unit sits within the streetscene and a place centred approach taken to enable a positive interaction that enhances the context and character of the area.

HDC Environmental Health: The main concern with these installations is their use of a microphone and loud speakers as part of the calling facility. These have caused issues for some residents near these units in other local authorities. Like most of central Horsham the dominant noise source is road traffic during the day. At night noise levels fall significantly and the ambient noise environment is much quieter. Recommend that this is made known to the applicant and that they reduce the maximum noise output from the loud speakers to 40% after 23:00 hours.

WSCC Highways: The existing pedestrian provision will not be impacted by the proposed Street Hub. No objection in terms of Highway Safety. Please note that works on the Public Highway requires a licence/agreement from WSCC. However, although outside of WSCC jurisdiction as Highway Authority, it would be advisable to consult with the Bus companies and WSCC Public Transport Team with regards to visibility for drivers on approach to the bus stop.

Representations:

14 representations have been received, objecting to the proposal for the following reasons:

- Impact on the neighbouring amenity due to lighting and resulting built form contributing to street clutter.
- Impact on those with limited mobility.
- Obscured views in comparison to phone boxes resulting in safety concerns / diminished line of sight.

- A site for anti-social behaviour.
- Health and safety impacts regarding radio waves.
- Climate change concerns with energy usage.
- Impact on neighbouring amenity.
- Heritage concerns.
- Impact on wildlife.
- Privacy concerns due to data monitoring ability and public wi-fi capabilities.

Neighbourhood Council Comments:

Denne Neighbourhood Council: Object: -

- From the plans it looks as though the proposed BT Hub could block the view of approaching buses for people waiting at the bus stop. Have the bus companies been consulted?
- HDNC considers the Hub is primarily a large advertising hoarding which could cause an obstruction in an area that HDC is trying to improve for businesses and their customers. The proposal violates the A Board policy designed to declutter pedestrian walkways.
- HDNC considers the design is garish and inappropriate in the town centre.

Forrest Parish Council: Object: -

- The siting of the hubs would cause an obstruction/hazard to the detriment of pedestrians.
- They will cause a narrowing of the pavement to the detriment of pedestrians.
- The illuminated signs would be a distraction for motorists.
- The proposal is not in keeping with Horsham District Council's A Board policy which states that a sign should be placed directly against a building frontage. This policy is implemented to reduce street clutter.
- Is contrary to policy HB7(D) of the Horsham Blueprint Business Neighbourhood Plan.

HUMAN RIGHTS AND EQUALITY:

The application has been considered having regard to Article 1 of the First Protocol of the Human Rights Act 1998, which sets out a person's rights to the peaceful enjoyment of property and Article 8 of the same Act, which sets out their rights in respect to private and family life and for the home. Officers consider that the proposal would not be contrary to the provisions of the above Articles.

The application has also been considered in accordance with Horsham District Council's public sector equality duty, which seeks to prevent unlawful discrimination, to promote equality of opportunity and to foster good relations between people in a diverse community, in accordance with Section 149 of the Equality Act 2010. In this case, the proposal is not anticipated to have any potential impact from an equality perspective.

PLANNING ASSESSMENT

Background

An accompanying application for advertisement consent, ref: DC/26/0120, was refused on 08.07.2026 for the following reason: -

1. The advertisement, by reason of its scale, illumination and siting would appear visually intrusive and would introduce a harmful degree of visual clutter into the street scene. The advertisement would fail to respond positively to the character of the town centre and would detract from the quality of the public realm, therefore resulting in unacceptable harm to visual amenity, contrary to Policies 14, 32 and 33 of the Horsham District Planning Framework (2015) and Policies HB3, HB4 and HB7 of the Horsham Blueprint Business Neighbourhood Plan.

Principle of Development:

The NPPF provides that, amongst other things, advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being, and that planning decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G).

The proposal entails the installation of a “BT Hub”, which is set out as being a multipurpose structure that has a number of functions offering: public 5G networking; public wi-fi capabilities; free telephone system (outgoing only); advertisement screens and smart city monitoring capabilities including air pollution monitoring and pedestrian movements. The includes digital advertisements displays (to the front and rear) which are electronic / illuminated, with a smaller panel to the side elevation which has capability to be interacted with for telephone calls and features a small keypad. The proposal would provide a number of public benefits which is of weight in the consideration of this application.

Design and Appearance:

Paragraph 135 of the NPPF seeks to ensure that development is high-quality, functional and enduring, creating visually attractive places through good architecture, layout and landscaping. They should respect and enhance local character and history while allowing for appropriate innovation, establish a strong sense of place, and make efficient use of land to support a suitable mix of uses and community infrastructure. Development should also deliver safe, inclusive and accessible environments that promote health and well-being, provide a high standard of amenity for all users, and avoid impacts that could undermine quality of life or community cohesion.

Paragraph 141 of 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”.

Policy 14 of the Horsham District Planning Framework (HDPF) states that advertisements should be sensitively designed, of an appropriate size and appropriately located. Advertisements should not be detrimental to the visual amenity of the buildings or area by reason of its scale, detail, character, design or illumination; impact on pedestrian or highway safety; or result in, or compound, the perception of clutter on the street scene.

Policies 32 and 33 of the HDPF seeks to ensure that development promotes a high standard and quality of design in order to enhance and protect locally distinctive characters. The policies also seek to ensure that the scale, massing and appearance of development relates sympathetically with the built surroundings, landscape, open spaces and routes within and adjoining the site, including any impact on the sky-line and important views.

Policy 34 of the HDPF seeks to conserve, sustain and protect the cultural and heritage assets that are within the district. It ensures that development within conservation areas is consistent with the special character of buildings and areas of which they are located within. Areas and buildings that fall under conservation, Listed Building designations or are approximate to them will be protected from inappropriate development which will harm the character and setting of the area / building.

Policy HB3 and HB4 of the HBBNP cover the design and character of development within Horsham which is supported by the neighbourhood councils of Forest, Denne and Trafalgar. It advocates for high quality design and construction that integrates with its surroundings whilst minimising impact on natural environments. It should reflect the character and architectural forms of the area in order to protect against inappropriate design.

Policy HB7 of the NP states that *“proposals for an advertisement and/or signage will be supported where it would not be obtrusive in appearance, cause visual clutter or lead to a proliferation of signs, appear dominant or overbearing in the street scene, or cause significant harm to the appearance of any*

building on which it would be displayed because of its siting, size, design, illumination, construction or materials.”

The application site is within the Horsham Town Centre Primary Shopping, in which Policy 13 of the HDPF states development will be supported, provided the proposals will improve the character, quality and function of the centre as whole.

Bishopric forms the western edge of the Horsham Town Centre, characterised mainly by active ground floor commercial frontages with associated building signage and residential above. Within the setting of the application site there are various pieces of street furniture, including litter bins, a bench, a bus stop with integral advertisement panel, telegraph poles and lighting columns. A-boards, where present, are generally sited outside of the related commercial premises, as required by the Council's A-board policy.

The development would introduce a modern and visually prominent feature which would contrast and stand out amongst the prevailing character. While street furniture is present in the locale, for example a bus stop with integrated advertisements, such additions are considered to appear as secondary more unassuming features of the street scene. In contrast, the proposal would compete with the height of the fascia boards of commercial premises in the locality and would be highly visible in views along Bishopric, being seen alongside and in conjunction with existing street furniture and creating the appearance of visual clutter. This would represent an uncharacteristic feature of the street scene that would harm the local character and sense of place, resulting in detriment to the visual attractiveness of the area.

It is considered that the development, by reason of its scale, height, siting, illumination and design, would introduce a visually intrusive and dominant form of advertising that fails to integrate harmoniously with the surrounding townscape. The large, illuminated screens and black metal casing would appear incongruous within the market town character of Horsham, result in visual clutter, and cause harm to the appearance of the street scene and the wider sense of place. The proposal is therefore contrary to paragraphs 135 and 141 of the NPPF (December 2024), Policies 25, 32 and 33 of the Horsham District Planning Framework, and Policies HB3, HB4 and HB7 of the Horsham Blueprint Business Neighbourhood Plan.

Residential Amenity:

Policy 33 of the HDPF states that permission will be granted for development that does not cause unacceptable harm to the amenity of the occupiers/users of nearby properties and land.

It is noted that concerns have been raised regarding the potential for the hub to attract anti-social behaviour, particularly at night, leading to noise levels which would affect properties within the vicinity of the site. While acknowledged that the hub would provide an opportunity to congregate to make use of the services offered, it is not anticipated that the hubs would be used for any sustained length of time, with potential for anti-social impacts a result of individual behaviour rather than an inevitable consequence of the development.

The submitted Planning Statement outlines a series of measures to protect the unit from antisocial behaviour and to maintain its upkeep including, including call blocking for suspected illegal activity, inspections and cleaning, noise and illuminance controls and public channels as a way to report issues. If necessary, these measures could be secured through an appropriate condition. This approach is considered sufficient to prevent any unacceptable harm in respect of anti-social behavioural related impacts.

In respect of noise impacts, the Council's Environmental Health Team have been consulted as part of this application, requesting that the maximum volume output be reduced to 40% between the hours of 23:00 and 07:00. A similar approach could be taken to reduce the illuminance of the display screens. If necessary, this could be secured through condition and would appropriately reduce noise levels at a time when background levels would be expected to be lower.

The siting and nature of the development would not lead to unacceptable harm to light or privacy for adjoining properties and land.

It is therefore considered that through the use of appropriate conditions the potential for unacceptable harm could be mitigated, such that there would be no conflict with the above policy.

Health Impacts:

The NPPF states that, *'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, or set health safeguards different from the International Commission guidelines for public exposure'*.

In relation to potential health effects associated with telecommunications equipment and compliance with the guidelines of the International Commission on Non-Ionizing Radiation Protection (ICNIRP), the application is accompanied by an ICNIRP certificate confirming that the proposal meets the relevant safety standards. This certification demonstrates that any telecommunications equipment within the proposed hub would operate within internationally recognised limits for public exposure to electromagnetic fields. The provision of this certificate offers reassurance that the proposal would not pose a risk to public health, and that the proposal would accord with the necessary regulatory requirements in this regard.

It is acknowledged that a number of representations include a genuine concern over health impacts arising from the proposal, including the potential for impact on medical implants and the visually impaired. It is though considered that the nature of the installation and the related coverage it would provide together with the certification and supporting information is sufficient to address health related impacts.

The view takes into account the Public Sector Equality Duty (PSED), as set out in Section 149 of the Equality Act 2010¹. It is considered that the proposal would not disproportionately affect individuals with protected characteristics, and there is no specific evidence relating to this proposal or location that would substantiate such claims. The NPPF is clear that local planning authorities must determine applications on planning grounds only and should not set their own health safeguards or question the need for a telecommunications system if the proposal meets official guidelines. An LPA should not therefore assume a general jurisdiction to regulate emissions through the planning process where statutory provisions do not provide one.

The impact of the development on health is material consideration in the determination of this application. On the basis of the available information and the relevant policy and legal framework, it is not considered that the specific impacts raised by this proposal would amount to a reason to withhold planning permission. Similarly, while concerns relating to biodiversity and wildlife are noted, in the absence of substantive evidence to demonstrate harm in these respects it is not possible to reach the conclusion that permission should be refused for these reasons.

Highways Impacts:

Policies 40 and 41 of the HDPF promote development that provides safe and adequate access, suitable for all users.

Policy HB7 of the HBBNP states proposals should seek to make pedestrian and cycle movement as a priority, including making provision for those with mobility requirements.

The development would not obstruct road signage or sightlines and, given the nature of Bishopric, changing images would not be expected to cause significant potential for harmful distraction. The proposal is not anticipated to result in an obstruction to pedestrians utilising the footway. The LHA also did not consider that the proposal would have an undue impact on the path or on the highway.

¹ This duty requires the elimination of unlawful discrimination, harassment, and victimisation, the advancement of equality of opportunity, and the fostering of good relations between people who share a protected characteristic and those who do not; protected characteristics include age and disability.

Water Neutrality:

The proposed development will not result in any increase in mains water demand and therefore will not lead to adverse effects on the integrity of the Arun Valley SAC, SPA or Ramsar sites, either alone or in combination. The proposal can therefore be screened out at the HRA Stage 1 Screening and does not require progression to Appropriate Assessment. On this basis, the development is considered acceptable in ecological terms and compliant with Policy 31 of the HDPF and relevant national policy

Biodiversity Net Gain (BNG):

Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) mandates that every development must achieve at least a 10% Biodiversity Net Gain (BNG) unless the development qualifies as exempt under the Biodiversity Gain Requirements (Exemptions) Regulations 2024).

The development is exempt from the requirement to achieve a minimum 10% BNG as it qualifies as 'de minimis' under Regulation 4 of the Biodiversity Gain Requirements (Exemptions) Regulations 2024

Other Considerations:

Representations have been received which include concerns relating to the use of CCTV and privacy impacts, and end of life decommissioning. The related implications of these issues are considered to be more appropriately fall under the remit of other non-planning legislation, and are not determinative in the outcome of this application.

Conclusions:

The proposal would provide public benefit derived from free public Wi-Fi, 5G small-cell mobile connectivity, free UK calls, free device charging, an emergency services button, environmental sensors, insight counting, and public messaging capabilities. The proposal would though, by reason of its scale, height, siting, illumination and design, would introduce a visually intrusive and dominant form of advertising that fails to integrate harmoniously with the surrounding townscape, resulting in visual clutter, and cause harm to the appearance of the street scene and the wider sense of place.

It is considered that this identified harm would outweigh the public benefits derived from the proposal, and it is therefore recommended that planning permission be refused.

Recommendation: Application Refused

Reason(s) for Refusal:

1. The development, by reason of its scale, height, siting, illumination and design, would appear visually intrusive and would introduce a harmful degree of visual clutter into the street scene. The development would fail to respond positively to the character of the town centre and would detract from the quality of the public realm, therefore resulting in unacceptable harm to visual amenity, contrary to Policies 14, 32 and 33 of the Horsham District Planning Framework (2015) and Policies HB3, HB4 and HB7 of the Horsham Blueprint Business Neighbourhood Plan.

POSITIVE AND PROACTIVE STATEMENT

Statement pursuant to Article 35 of the Town and Country Planning (Development Management Procedure) (England) Order 2015. The Local Planning Authority has acted positively and proactively in determining this application by assessing the proposal against all material considerations, including planning policies and any representations that may have been received, in order to be able to, where possible, grant permission.

Plans list for: DC/26/0119

(The approved plans will form Condition 1 on the Decision Notice of all Permitted applications)

Schedule of plans/documents **not approved**:

Plan Type	Description	Drawing Number	Received Date
Supporting Statement	Noise management plan	NONE	26.01.2026
Supporting Statement	Anti-social behaviour management plan	NONE	26.01.2026
Supporting Docs	Declaration of RF public exposure conformity	NONE	26.01.2026
Supporting Statement	Lighting statement	NONE	26.01.2026
Supporting Statement	Covering letter	NONE	26.01.2026
Supporting Docs	WSCC Developers notice	NONE	26.01.2026
Supporting Statement	Planning statement	NONE	26.01.2026
Photos	Existing and proposed render	NONE	26.01.2026
Supporting Statement	Product statement	NONE	26.01.2026
Elevation & Floor plan	Dimensioned	STH-001	26.01.2026
Location & Site plan	Existing	001	26.01.2026
Location & Site plan	Proposed	002	26.01.2026
Elevation plan	Existing site elevations	003	26.01.2026
Elevation plan	Proposed site elevations	004	26.01.2026

DELEGATED

Authorising Officer sign/initial Guy Everest

Date: 24.07.2026