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For the attention of Sam Nye & Jacques Burrows

Planning and Development
Horsham District Council
Albery House
Springfield Road
Horsham
RH12 2GB

By email to planning@horsham.gov.uk

Your reference: DC/26/0119, DC/26/0120, DC/26/0180, DC/26/0181, DC/26/0182 and DC/26/0183

Emailed 3 March 2026

Dear Jaques Burrows and Sam Nye,

I am writing to object to all six planning applications submitted by BT Group plc for BT Street Hub Units in Horsham (DC/26/0119, DC/26/0120, DC/26/0180, DC/26/0181, DC/26/0182 and DC/26/0183).

These applications relate to three sites (two on Bishopric and one on West Street) with duplicate applications for each location. All share identical titles and because they were submitted separately have different case officers. This has created unnecessary confusion. It is unclear why the proposals were not consolidated into a single application per site.

Please record this objection against each of the six applications listed above.

1. Out of Character and Harm to Amenity

The illuminated digital advertising panels are visually intrusive and wholly out of keeping with the character of Horsham as a traditional market town. The installations are highly urban in nature and more suited to major cities than to Horsham's scale and setting.

The West Street unit would be visible from a considerable distance. If the Bishopric oasis is removed (as proposed by HDC) the Bishopric units would become even more prominent within what is clearly a pedestrian-focused area. The result would be urbanisation of the streetscape and harm to visual amenity.

All the glossy marketing brochures included in support of the applications show images of London demonstrating that street-hubs are highly urban interventions and inappropriate for the setting of Horsham.

2. Street Clutter and Policy Conflict

The proposed locations are already cluttered with street furniture and signage. At Freshwater Parad, an advertising panel already exists at the nearby bus stop.

I refer you to Horsham District Council's own policies and regulations on the use of A-boards <https://www.horsham.gov.uk/business/a-board-advertising>. The application proposals do not meet several requirements. While the applicant may argue that a Street Hub is not an A-board, the same principles of visual impact, obstruction and amenity should apply under Horsham District Council's own advertising and public realm policies.

3. Highway and Pedestrian Safety

Both Bishopric sites are at a busy junction. Bright, frequently changing digital displays risk distracting drivers and cyclists, particularly at night and in poor weather. Research indicates digital billboards increase driver glance frequency and cognitive load, impairing reaction times. e.g.

https://trid.trb.org/View/1540586?utm_source

Psychological studies suggest flashing or moving ads can involuntarily attract drivers' eyes and longer glances away from the roadway are correlated with higher crash likelihood in general (distraction risk).

<https://www.psychologicalscience.org/news/motr/are-digital-billboards-dangerously-distracting>

There are also concerns about:

- Obstruction of sightlines
- Incorrect speed data shown on submitted drawings (30mph, not 20mph)
- Conflict with pedestrian and future cycle flows
- Impacts on visually impaired and mobility-impaired users

Public safety is a material consideration under the Town and Country Planning (Control of Advertisements) Regulations 2007.

4. Lack of Demonstrated Need

The applications overstate the community benefit. With the exception of the former kiosk site outside KFC, the hubs do not replace active phone boxes. The removed kiosk had not been used for years, demonstrating lack of demand.

Free Wi-Fi is already widely available nearby (including commercial premises, the library and Swan Walk). There is no independent evidence of meaningful use of the interactive tablets or free-call facilities in comparable non-urban areas. The claimed benefits appear a speculative gimmick and marketing-led rather than evidence-based.

5. Antisocial Behaviour Risks

There is documented evidence that similar installations have attracted antisocial behaviour and misuse of free-calling functions, leading in some cases to suspension of those services thereby negating some of the self-stated 'benefits'.

The applications provide:

- No site-specific crime data
- No independent evaluation of impacts in comparable towns (not cities)
- No detailed, enforceable management and monitoring plan

Under the Town and Country Planning (Control of Advertisements) Regulations 2007, advertisement consent must consider public safety and impact on amenity. Concerns associated with Street Hubs include:

- Congregation and loitering
- Night-time illumination and digital advertising impact
- Visual clutter in already constrained pavements

- Potential increased demand on local policing resources

Even the perception of reduced safety or increased nuisance is a material planning consideration. Horsham Police resources are already stretched.

6. Inadequate and Unreliable Safety Certification

The submitted safety certificates with each application entitled - "Declaration of Conformity With Public RF Exposure Guidelines of The International Commission On Non-Ionising Radiation Protection ("ICNIRP") - are materially deficient, unreliable, and legally ambiguous.

Namely:

- **Outdated Regulatory Reference** – The certificates relies solely on the outdated 1999 EU Recommendation (1999/519/EC) and do not reference the updated 2020 ICNIRP RF Exposure Guidelines, despite the installations providing modern Wi-Fi and 5G services.
- **Factual Error in Authority Name** – The certificates refer to "INCIRP" instead of the correct "ICNIRP", indicating careless drafting and undermining confidence in the professional oversight of the document.
- **Lack of Legal Accountability** – They are issued in the name of "BT Wholesale," which is not a separate legal entity. BT Wholesale was never a limited company. Defunct companies of this name are on Companies House but have nothing to do with British Telecom or BT Group plc. BT Wholesale was a past division of BT Group plc. It no longer exists. It is not evident who would be legally responsible or liable for the accuracy of the certification or any non-compliance. It is not underwritten by a legal entity.
- **Insufficient Technical Detail** – The certificate provides only generic assurances and does not confirm predicted exposure levels, specific limits, independent verification at publicly accessible locations or how exposure will be monitored and corrected to ensure public safety.

Please be aware that ICNIRP guidelines exclude people with metal implants and do not ensure their safety.

Examples include:

- surgical metal pins, plates, rods, discs, screws for joint replacement of knees and hips.
- cardiovascular implants – implantable heart loop recorders, stents and pacemakers
- Magnetic cerebral spinal fluid shunts.
- Cochlear implants for hearing loss.
- Dental work – braces, implants, metal crowns, pins, denture arches, mercury amalgam fillings.

What measures are in place to protect these people? While government directive may direct you to approve if an ICNIRP declaration is included (which are non-compliant in these applications) Health & Safety law and discrimination law is paramount.

7. Lack of Disposal and Sustainability Plan for Street Hub

I could find no information regarding the end-of-life management, environmental impact, or energy sustainability of the proposed Street Hubs which is inconsistent with local planning policies and council guidance.

Key concerns:

No Disposal or Redundancy Plan

The applications do not outline how the Street Hubs will be managed if damaged or vandalised beyond repair, become obsolete, or otherwise redundant.

Without a clear plan, there is a risk of environmental harm from disposal of electronic components, hazardous materials (batteries, circuit boards), and non-recyclable plastics.

Proper disposal and recycling are material planning considerations under local environmental and sustainability policies. Who is liable for the disposal and associated cost?

Energy Consumption and Carbon Impact

Street Hubs operate 24/7, providing Wi-Fi, free calls, digital advertising, and interactive services, which collectively consume a significant amount of electricity. Continuous operation contributes to local energy demand and increases data transmission to remote servers, which in turn raises data centre energy consumption and associated carbon emissions. The applications provide no assessment of annual energy use, carbon footprint, or mitigation measures (e.g., energy-efficient components, renewable sourcing).

Sustainability Considerations

Modern planning guidance increasingly requires applicants to demonstrate that urban infrastructure is sustainable, energy-efficient, and environmentally responsible.

The absence of any plan for circular lifecycle management (design, use, repair, recycling, disposal) or for limiting data-related energy impacts is a material omission.

8. Lack of Local Consultation

Despite references to consultation, there is no evidence of meaningful pre-application engagement with Horsham District Council regarding emerging public realm proposals for Bishopric and West Street. The siting appears driven by underground BT infrastructure rather than by urban design considerations.

9. Wider Social Impact

At a time of growing concern about excessive screen and online exposure, particularly for children, the introduction of additional large digital advertising screens with interactive capability in the public realm at street level sends an inconsistent message about responsible screen use. Is HDC happy to endorse this?

For the reasons set out above, I respectfully request that all six applications be refused.

Yours sincerely,

[Redacted Signature]

cc

Councillor Clive Trotter [Redacted]

Councillor Cheryl Sweeney [Redacted]

Councillor Ruth Fletcher [Redacted]

Councillor Martin Boffey [Redacted]

Councillor Anthony Frankland [Redacted]