



DELEGATED APPLICATIONS - ASSESSMENT SHEET

APPLICATION NO./ADDRESS:

DC/26/0180

Land at 516983 130647, West Street, 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/26/0181	Installation of 1No. BT Street Hub Unit and associated advertisement panels on either side of the unit. (Advertisement Consent)	Application Refused on 09.07.2026
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DESCRIPTION OF THE SITE

This application relates to a section of pedestrianised highway on West Street, located within the defined extent of Horsham Town Centre and within the designated Horsham Town Centre Primary Shopping Area. The site is not directly subject of any heritage designation, though, is located approximately 55 metres west of the Horsham Town Centre Conservation Area and similar distance to the Grade II Listed buildings at 21, 21A and 22 West Street located on the boundary of this heritage designation. The Green Dragon Public House, 12 Bishopric, is located 72 metres to the west of the site and further field, 55 West Street (Grade II Listed) is located approximately 140 metres to the east.

The site surroundings are varied in type and character, though, considered representative of the mix of uses and development typically seen within a town centre setting. West Street is pedestrianised and largely benefits from an attractive streetscape dominated by retail and service type uses. Notwithstanding the prevalence of commercial uses, a good level of residential development can be identified within the vicinity of the site, including at first/second storey levels to many buildings fronting West Street, including No.29 West Street located immediately in front of the application site.

DESCRIPTION OF THE APPLICATION

This application seeks full planning consent for the siting of a free-standing structure, featuring digital HD display screens on two sides. The structures have an overall height of 2.9metres, width of 1.2m and a depth of 0.35m, constructed and finished in a black painted powder coated cladding. The structures are capable of a number of features, including providing free public Wi-Fi, USB/Mobile charging, direct emergency phone calls, 4G and 5G smart cells coverage, can collect environmental and movement data via sensors, allows free UK phone calls and the digital screens provide advertising and public information.

RELEVANT PLANNING POLICIES

The National Planning Policy Framework (NPPF)

Horsham District Planning Framework (2015):

Policy 1 - Strategic Policy: Sustainable 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 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 3: Settlement Expansion
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 Team: Although the site lies outside the Horsham Town Centre Conservation Area, it is within its wider setting and forms part of the key pedestrian shopping frontage experienced by visitors to the town.

The proposed hub, by virtue of its size, design and moving imagery, would compete with the historic character of the area, appear incongruous, and detract from public amenity.

The incremental addition of signage, bins and telecoms infrastructure contributes to street clutter, which requires careful management to maintain a coherent sense of place. The NPPF highlights that good design is fundamental to sustainable development and creating attractive, welcoming places.

An ad hoc, infrastructure led approach risks further visual clutter and a confused street scene, diminishing the character and attractiveness of the locality. A more place-centred approach is therefore encouraged to ensure integration within the street scene; however, as submitted, the proposal is considered to result in harm to the character and appearance of the area and the setting of the Conservation Area.

HDC Environmental Health Team: Comment. The main concern with these installations is their use of a microphone and loudspeakers 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. Therefore, it is recommended that the volume is reduced to 40% between 23:00 and 07:00 hours.

WSCC Highways: The proposed location is not anticipated to result in an obstruction to pedestrians utilising the footway given that there is sufficient space either side for pedestrians to manoeuvre around the Street Hub.

The maximum daytime luminance level would be 5000cd/m². Whilst the Design and Access Statement advises that the applicant would accept a condition limiting night-time luminance to 600cd/m², Table 10.4 of The Institute of Lighting Professionals' Professional Lighting Guide PLG05/23: *The Brightness of Illuminated Advertisements including Digital Displays* (2023) recommends a maximum luminance of 300cd/m² within an E3 environmental zone. The LHA raises no highway safety objection to the principle of the proposal but requests that the night-time luminance level be reduced to 300cd/m². This could be secured by condition, although the LPA may wish to resolve the matter prior to determination.

The LHA does not consider that this proposal would have an unacceptable impact on highway safety or result in 'severe' cumulative impacts on the operation of the highway network, therefore is not contrary to the National Planning Policy Framework (paragraph 116), and that there are no transport grounds to resist the proposal. Informative and Conditions recommended.

Representations:

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

- The proposal introduces a major interference with sight lines both east and west along West Street resulting in retail units being obscured
- Considerable effort and money were spent removing obstacles from West Street
- Far reaching visual impacts
- Negative impact on turnover and footfall of West Street
- Impacts on pedestrian movement flow, clutter causing issues for mobility impaired, sight impaired and pushchairs
- Impact on public safety, with persons unable see behind the hubs
- Minimal public benefits, with minimal justification for the necessity
- Insufficient justification has been provided to demonstrate the necessity of the proposal, resulting in concerns regarding over-commercialisation and unnecessary street clutter
- Concerns regarding light pollution and impacts on residential amenity
- Potential adverse impacts on insects and birds arising from the illuminated displays
- Concerns that the LED displays could adversely affect individuals with sensory sensitivities and certain health conditions
- Concerns regarding the health impacts of exposure to LED lighting
- Concerns regarding surveillance, privacy and the use of CCTV
- Concerns regarding the health implications of 4G/5G infrastructure and electromagnetic field exposure
- Concerns regarding the effects on individuals with medical implants and liability arrangements.
- Objections that telecommunications infrastructure could be delivered through less intrusive alternatives
- Insufficient information has been provided regarding sustainability and energy efficiency measures
- Impact on highway safety, proposals will cause distractions to all highway users
- Concerns regarding energy consumption and conflict with climate change objectives
- Concerns that the proposal could attract graffiti and anti-social behaviour
- Concerns regarding potential noise emissions from the installation
- Proposals do not respect the traditional streetscape, or historic character of the area
- Impact on Horsham Conservation Area

- The proposal is considered to conflict with national planning policy relating to design and advertisements
- Concerns regarding the absence of a disposal and end-of-life management strategy for the installation
- Concerns regarding the lack of meaningful pre-application consultation and the rationale for the proposed siting
- Concerns regarding the wider social impacts of introducing additional digital advertising screens in the public realm.

Neighbourhood Council Comments: Objection: -

- The proposed BT Hub is not replacing an existing kiosk at this location and its provision of wi-fi and free phone calls is superfluous to requirements
- It is primarily an extremely large (3 metres high), illuminated advertising boarding which blocks the clear view along West Street and causes an obstruction. It contravenes the intention of the HDC 'A' Board policy designed to declutter pedestrian walkways
- HDNC considers the design is garish and inappropriate in regard to the character of the town centre and nearby conservation area
- HDNC is concerned that the BT Hubs will attract anti-social behaviour and misuse
- HDNC has noted and supports the very detailed responses on the planning portal regarding potential hazards to both mental and physical health.

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/26/0181, was refused on 08.07.2026 for the following reason: -

1. The advertisement, by reason of its scale, illumination and siting within a prominent location on West Street, 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 and the setting of the nearby Conservation Area. The advertisement would therefore result in unacceptable harm to visual amenity, contrary to Policies 14, 32, 33 and 34 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.

West Street forms a key pedestrianised shopping route within the Horsham Town Centre, characterised by active ground floor commercial frontages with associated building signage. Within the setting of the application site there are various pieces of street furniture, including litter bins and seating, with lighting columns sited centrally along the length of the street. A-boards, where present, are sited outside of the related commercial premises, as required by the Council's A-board policy.

It is considered that the proposal would represent an uncharacteristic form of development that would harm the local character and sense of place, resulting in detriment to the visual attractiveness of the area. West Street is relatively free from clutter, allowing unobstructed views both eastwards along West Street and Middle Street and westwards towards Bishopric. The proposed structure, standing close to 3 metres in height and approximately 1.2 metres in width, would appear prominent within the public realm.

The approach to street furniture on West Street has minimised the presence of 'clutter' which allows and retains largely unobstructed views both east along West Street and Middle Street and west towards the Bishopric. An advertisement of the scale, nature and siting proposed would represent an uncharacteristic feature and a form of advertising which would create a stark and visually jarring contrast with the surrounding character. While the advertisement would not be within the Horsham Conservation Area, it would be highly visible in views from the CA and, for the reasons set out above, would adversely impact on its setting.

The development, by reason of its scale, illumination and siting within a prominent location on West Street, 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 and the setting of the nearby Conservation Area. The development would therefore result in unacceptable harm to the character and appearance of the locality, contrary to Policies 14, 32, 33 and 34 of the Horsham District Planning Framework (2015) and Policies HB3, HB4 and HB7 of the Horsham Blueprint Business Neighbourhood Plan.

While the submitted supporting statement suggests the proposal would assist in decluttering the streetscape through the removal of existing payphones, the same statement notes that no kiosks are available to be removed; on this basis the proposal would not result in any decluttering of the street, and the proposal would instead have the opposite effect, as set out above.

It is recognised that the site is located within an Archaeological Notification Area related to the Horsham Town Medieval Core. However, given the established built-up context of the area and the nature and scale of proposal, it is considered unlikely that the proposal would result in an adverse effect on archaeological remains.

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.

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.

West Street is a publicly maintained pedestrian highway and West Sussex County Council have been consulted in their capacity as the Local Highways Authority. Their consultation response has confirmed that the proposals are not anticipated to result in an obstruction to pedestrians utilising the footway given that there is sufficient space either side for pedestrians to manoeuvre around the Street Hub.

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, illumination and siting within a prominent location on West Street, 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 and the setting of the nearby Conservation Area.

It is considered that the 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, illumination and siting within a prominent location on West Street, 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 and the setting of the nearby Conservation Area. The development would therefore result in unacceptable harm to the character and appearance of the locality, contrary to Policies 14, 32, 33 and 34 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/26/0180

(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	Version 2	02.02.2026
Supporting Statement	Anti-Social Behaviour Management Plan	Version 3	02.02.2026
Supporting Docs	Declaration of RF Public Exposure Conformity	NONE	02.02.2026
Supporting Statement	Lighting Statement	PLG 05/23	02.02.2026
Supporting Statement	Covering Letter	NONE	02.02.2026
Supporting Docs	WSCC Developers Notice	NONE	02.02.2026
Supporting Statement	Planning Statement	NONE	02.02.2026
Photos	Existing and Proposed Views	NONE	02.02.2026
Supporting Statement	Product Statement	Version V2.2	02.02.2026
Elevation & Floor plan	Dimensioned Elevations	STH-001	02.02.2026
Location & Site plan	Existing Site Plan	001 A	02.02.2026
Location & Site plan	Proposed Site Plan	002 A	02.02.2026
Elevation plan	Existing Site Elevations	003 A	02.02.2026
Elevation plan	Proposed Site Elevations	004 A	02.02.2026

DELEGATED

Authorising Officer sign/initial

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Guy Everest

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Date: 24.07.2026