



Objections to planning applications BH2024/01172 and BH2024/01173 Pulse Smart Hub and integrated digital advertising screens. Pavement outside 17 Jubilee Street, Brighton BN1 1GE.

We object strongly to these applications for planning permission for 'communications hubs' with illuminated advertising screens.

We are aware of the planning history of this site, in relation to applications for permission to site a call box in the same location, and that the siting of telecommunications installations can be covered under the General Permitted Development Order (GPDO). However, this does not apply to the digital advertising screens which are integral to these 'hubs'.

We note that the only issues that can affect permission under the GPDO are the siting and appearance of the development. We therefore focus our objections on these issues, although we do note that the previous applications, some of which were allowed on appeal, date from 2018 (six years ago), and refer to call boxes, not to these new hubs.

It is worth noting that, as of 2023, 98% of adults aged 16-24 in the UK had access to a smartphone; 86% of those aged 55-64, and 80% of those aged 65 and over. These figures have increased dramatically over time and it is predicted that roughly 98% of the UK population will be smartphone users by 2025¹. These statistics alone undermine the claim in the applications that these hubs will 'protect and save lives' because 'modern life requires people to stay connected', access emergency services etc. Clearly, people are already connected and can call emergency services on their mobile phones, which undermines the need for such 'hubs'.

These 'communication hubs' have been rejected by councils elsewhere (e.g. Cardiff City Council), because of their size and impact and in recognition that these applications add to unnecessary street clutter for minimal public benefit².

1. Siting of the 'hubs'

One of the grounds on which permissions can be refused for these developments is siting and we would draw attention to two aspects here: location, and placing the 'hub' on the pavement.

- **Location.** BHCC's own website³ describes Jubilee Square, in which this 'hub' would be located as follows: "Jubilee Square is Brighton's most exciting and vibrant outdoor and pop-up venue

¹ <https://www.uswitch.com/mobiles/studies/mobile-statistics/>

² <https://adfreecities.org.uk/2024/01/adblock-cardiff-win-against-ads-disguised-as-communication-hubs/>

³ <https://jubileesqbrighton.wordpress.com/>

space, nestled in the heart of the city, outside the Jubilee Library." The space is used for a wide range of cultural activities including art showcases, installations, street theatre, exhibitions, community events, outdoor screenings and music events; as well as commercial events including markets, fairs, tech and media promotions, product launches and sampling.

The BHCC website goes on to state that Jubilee Square is "in the heart of Brighton's cultural quarter". This cultural quarter is centred around the Royal Pavilion, Brighton Museum & Art Gallery, Brighton Dome, the historic Theatre Royal – all listed buildings.

The Inspector's report on previous appeals against refusal of planning permission for call boxes in this location (as cited in the applicant's documents) suggests that those original proposals did not conflict with Brighton and Hove City Plan at the time, which stated that "proposals for telecommunications development will not be permitted where they have an adverse effect on important areas and their settings, including conservation areas and listed buildings".

However, the use of Jubilee Square for cultural and commercial events has grown significantly since 2018, with events now being staged many times throughout the year, increasing the cultural importance of the square and the need to protect and enhance public access.

The importance of Jubilee Square in Brighton's cultural quarter should be grounds for refusing permission for this 'hub' in this location.

- **Siting on the pavement.** The Inspector's report states that "At the time of my AM weekday site visit, pedestrian footfall in this area was not particularly high". He does recognise that "the appellant has not provided a pedestrian survey in support of the proposal"; the applicant has not provided this information in support of the current application either.

The Inspector's report also states that the call boxes did not conflict with City Plan policies which seek "to improve the quality, legibility and accessibility of the city's public urban realm through new development schemes to produce attractive and adaptable streets and public spaces that enrich people's quality of life and provide for the needs of all users by positively contributing to the network of public streets and spaces in the city; conserving or enhancing the setting of the city's built heritage; and reducing the clutter of street furniture and signage."

However, as the photos on BHCC's own website demonstrate⁴, there are many occasions now when the area is packed with pedestrians. As the website states⁵: "The square sits on one of the city's main thoroughfares, connecting the popular North Laines shopping area to the Pavilion Gardens area. ... [it is] a bustling commercial and cultural environment, receiving footfall of approx. 24k – 31k per week."

The 'hub' will create a major obstruction on the pavement in an area which now attracts many thousands of residents and visitors on foot, in wheelchairs, pushing buggies etc.

The importance and popularity of this pedestrian route through the city should therefore be recognised as grounds for refusing the application for this 'hub' on the pavement in this location.

⁴ <https://jubileesqbrighton.wordpress.com/>

⁵ <https://jubileesqbrighton.wordpress.com/about/>

2. Appearance of the 'hubs'

As North Laine Community Association (NLCA) has argued in their own objections to these applications, the appearance of the 'hub' - particularly the digital advertising screens - would be detrimental to public amenity.

As the NLCA points out, the documentation supporting the planning application significantly misrepresents the actual visual impact of the 'hub'. They compare and contrast the artist's impression of the installation (shown below), submitted by the applicant in their drawings, which **significantly under-represents the size of the installation and therefore of the advertising screens.**



In practice, the 'hub' will block views along Jubilee Street towards New Road and the Theatre Royal (a listed building). To illustrate the actual size and impact of the appearance of the 'hub', NLCA has superimposed onto a photograph a carefully scaled image of the Smart Hub taken from the applicant's literature. The proposed hub is 2.54m (8ft 4in) tall:



Conclusions

In summary, we urge that these applications be refused on the grounds of the inappropriate location and siting of the 'hubs' in relation to the cultural significance of the site and to its importance as a pedestrian thoroughfare.

It is also important to establish a precedent for Brighton and Hove: that these entirely unnecessary and obstructive installations are not allowed to create further street clutter which diminishes the heritage, cultural and social value of Brighton and Hove for residents and visitors, as well as damaging the city's tourism and cultural economy.

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