

PLANNING REF : 242150
PROPERTY ADDRESS : 14 Mallard Close
: Twyford
: RG10 0BE
SUBMITTED BY : Mark Bowden
DATE SUBMITTED : 30/08/2024

COMMENTS:

This is not in keeping with the framework for Conservation Principles Principle 1: The historic environment is a shared resource

- If this is a shared resource, how do those who use the resource, or allow the resource (resource in this case being the village centre) benefit from the application?

Principle 2: Everyone should be able to participate in sustaining the historic environment

- The addition of an advertising board with a phone attached doesn't sustain the historic environment.

Principle 3: Understanding the significance of places is vital

- There is no understanding shown here in the this planning application. A phone booth by the library or Silk Mill would be far more practically advantageous than one in the middle of the village.

Principle 4: Significant places should be managed to sustain their values

- This advertising hoarding with a phone attached doesn't sustain the values or the aesthetics of the village centre.

Principle 5: Decisions about change must be reasonable, transparent and consistent

- Who benefits from this? What benefit does the village directly see from the installation of the hoarding and the income associated with the advertising? Where are the declarations about this?

The pavement doesn't need this in the way of pedestrians.

What evidence is there to show that the local community needs a phone booth in the centre of town? What research and surveys have been undertaken to show " Our kiosks are regularly used to report emergencies and are used by the vulnerable"

The design isn't in keeping with the local architecture.

When does the "full and thorough consideration process" take place? Is it just through the planning application?

"Importantly, the term significance is paramount in assessment."

- Significance in this instance is that the centre of the village is the most significant and historical part of Twyford. So with this in mind there has been no significant assessment of the positioning of the advertising hoarding.

Point 10 states the following:

"When assessing the proposal, if any harm is identified, it must be weighed against the public benefit of the proposal. Due to the economic, social, and environmental objectives of the proposal, and supporting of national and local policy, the public benefits derived from the proposal will benefit the public at large"

- If there is harm identified. The harm in this instance being the impact on this historical significance of the village centre with a large illuminated advert and phone booth.

Weighing it against the 'public benefit'. In a society where most if not all people have phones, there seems to be little to no need for a phone box.

"the public benefits derived from the proposal" - How do the public of Twyford benefit from this proposal. They won't see the benefit of the advertising revenue created by the sign.

The need for a phone is clearly not important given "Almost all (98%) UK adults aged 16-24 now have a smartphone."

The lowest percentage of mobile phone ownership is amongst the 65+ age group is at ~78%. The percentage between 16-54 is around 98%. So *if* there is a need for a phone booth, closer to the library, Silk Mill and Bridge House would be a better position, and they won't need an advertising booth. Source:

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

"there has been a steep decline in calls made from such boxes, falling from 800 million minutes in 2002 to just 4 million in 2021/22." and this has continued over the last 3 years, so the 'public benefit' is limited especially as we have a good mobile signal across all networks in the village.

The Historic England Guidance suggests the following: "Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change" The data of phone usage doesn't show a need for change.

The Google Street view shows two people walking along the street at the point that the advertising hoarding with a phone attached is planned. This clearly shows that there isn't enough space on the pavement for people walking in the opposite direction to avoid having to stop or wait for people to pass the advertising hoarding
<https://maps.app.goo.gl/SjwFGg6NjbVYqiSaA>

There is limited benefit, but substantial impact in the placement and size of the advertising hoarding.

"The functionality of public communications kiosks has evolved to include greater service flexibility, with the proposed new communications Kiosk featuring various public communications functions including advertising"

- This is fundamentally incorrect. The functionality of 'public communications' has declined, and advertising is the primary purpose of this installation. As stated phone booths aren't used in the same manner as they were 20 years ago and are no longer needed.

"Need for public payphones

Public call boxes can provide a safety net for people without access to a landline or working mobile phone. In areas with poor mobile coverage"

Twyford doesn't have poor mobile coverage. The Ofcom mobile coverage checker for the proposed address shows 'Likely' for all major networks for indoor and outdoor voice and data communication.
<https://checker.ofcom.org.uk/en-gb/mobile-coverage#pc=RG109ER&uprn=14039061>

"NWP plans to reflect these changes, upgrading and adapting the communication kiosk to allow a base level coverage provision across urban areas fit for the 21st century."

Given there has been no phone box here in the past, and there has been no call to install one. There is no need to 'upgrade' or 'adapted' what's in place already.

Ofcom's own guidance states:

Source:

<https://www.ofcom.org.uk/siteassets/resources/documents/consultations/category-1-10-weeks/227665-review-of-the-telephony-universal-service-obligation/associated-documents/telephony-uso-statement.pdf?v=327998>

"PCBs continue to be provided to meet the reasonable needs of end-users, in particular acting as a safety net for those in remote or rural areas or vulnerable customers who might otherwise be at risk of social and/or economic exclusion;"

The centre of Twyford is neither 'remote' or 'rural'. Nor does it suffer from 'social or economic exclusion'

ONS used data from the Wealth and Assets Survey suggested that the Berkshire is the 4th richest area in the UK

Source:

[k-how-much-wealth-150957367.html](https://www.ons.gov.uk/peoplepopulationandcommunity/wealth/articles/howmuchwealth/150957367.html)

Ofcom state "Our November consultation detailed our proposals for changing the current telephony universal service obligations on BT and KCOM.¹⁶ We outlined how, since our previous review in 2006, the evolution of technology, market developments and changing consumer needs had led to significant changes in the use of PCBs. In particular we pointed to the increased use of mobile services, improved mobile coverage and access to emergency and highlighted the resulting steep decline in PCB usage, with call minutes having decreased from around 800m in 2002 to 7m in 2020. Since our consultation, call minutes from PCBs have further declined and were down to 4m in 2021/22.¹⁹"

Given that call minutes from PCBs fell 3m in one year, and we're now 3 years from the last available set of data, the numbers will be even lower and therefore the need for a phone box would be questionable.

Ofcom's guidance doesn't suggest that public call boxes should be used for advertising.

The location of the phone box doesn't support those in the community who are most needy.

The advertising hoarding doesn't benefit anybody in the local community.

The placement and design of the planned development doesn't consider the heritage of the area.

The placement doesn't take into account the width and usability of the pavement.

The only viable reason for the placement of the planned development would be to benefit Clear Channel who are based at 33 Golden Sq as they would be able to place adverts to drive revenue that wouldn't benefit the village and provides no meaningful service what so ever to the local community.

I object to this development.

