Horsham District Council

DELEGATED APPLICATIONS - ASSESSMENT SHEET

APPLICATION NO./ADDRESS:

DC/25/1199
Jengers Mead Car Park/Parking Bays , Billingshurst , RH14 9PB

DESCRIPTION:

Installation of 2No. ANPR Cameras.

RELEVANT PLANNING HISTORY:

DC/25/0367	Installation of 2no. PTZ (pan, tilt, zoom) cameras.	Refused on 22.07.2025

DESCRIPTION OF THE SITE

Jengers Mead Car Park is located within Billingshurst and is a 1970s shopping centre accessed from the High Street comprising ground floor commercial units with residential above, centred around a central parking courtyard. The site is part of the Billingshurst Conservation Area. The site is privately owned and managed.

DESCRIPTION OF THE APPLICATION

This application seeks planning permission for the installation of two Automatic Number Plate Recognition (ANPR) cameras at Jengers Mead Car Park. These would be located on 5 metre high black powder coated steel poles with the camera on the top. The first would be located at the southern end of 'Atlantic House' adjacent to a blank three storey wall with no windows. The second would be installed adjacent to 3 Jengers Mead to the rear of the existing footway, adjacent to a blank three storey section of wall.

The cameras are required to support car park management and crime prevention within the established retail and commercial area. The positions have been designed to enable full coverage of the Jengers Mead parade, enhance the existing parking enforcement, and make management of parking and freehold land safer and more efficient.

RELEVANT PLANNING POLICIES

The following Policies are considered to be relevant to the assessment of this application:

National Planning Policy Framework

Horsham District Planning Framework (HDPF 2015):
Policy 1 - Strategic Policy: Sustainable Development
Policy 12 - Strategic Policy: Vitality and Viability of Existing Retail Centres
Policy 13 - Town Centre Uses
Policy 32 - Strategic Policy: The Quality of New Development
Policy 33 - Development Principles
Policy 34 - Cultural and Heritage Assets
Policy 39 - Strategic Policy: Infrastructure Provision

Policy 41 - Parking
Policy 42 - Strategic Policy: Inclusive Communities

Billingshurst Neighbourhood Plan (2021):
BILL1: Billingshurst Built-Up Area Boundary

Horsham District Local Plan (2023-40) (Regulation 19):
Strategic Policy 1: Sustainable Development
Strategic Policy 9: Water Neutrality
Strategic Policy 19: Development Quality
Strategic Policy 20: Development Principles
Policy 21: Heritage Assets and Managing Change within the Historic Environment
Strategic Policy 23: Infrastructure Provision
Policy 25: Parking
Strategic Policy 27: Inclusive Communities, Health and Wellbeing

Supplementary Planning Guidance:
Planning Obligations and Affordable Housing SPD (2017)
Community Infrastructure Levy (CIL) Charging Schedule (2017)

Planning Advice Notes:
Facilitating Appropriate Development
Biodiversity and Green Infrastructure

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:

INTERNAL CONSULTATIONS

HDC Conservation: No Objection

The proposed cameras and posts will not be conspicuous within significant areas of the conservation area. Satisfied the proposal will not affect the character of the conservation area.

OUTSIDE AGENCIES

Sussex Police: Designing Out Crime Officer: Comments

From a crime prevention perspective when considering any ANPR system, the equipment must be commensurate with the lighting conditions as proper illumination of license plates can greatly increase ANPR accuracy.

Additionally, any trees or hedges adjacent to the proposed ANPR cameras or within the field of view being covered must be regularly pruned especially during summer months in order to ensure that the cameras are not obscured by foliage.

PUBLIC CONSULTATIONS:

Representations:

One letters has been received neither objecting nor supporting the application. This queries whether the flats at Jengers Mead would be allowed to drop off/ pick up without being charged

Parish Comments:

Billingshurst Parish Council: Objection

Due to a lack of consultation with the retailers on this road and the impact of cameras on the amenities and the evening economy.

Member Comments:

None received

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

Principle of Development:

Policy 33 of the HDPF relates to development principles and states that proposals should (where appropriate) incorporate measures to reduce any actual or perceived opportunities for crime or antisocial behaviour on the site and surrounding area. Paragraph 96 of the NPPF states that planning decisions should aim to achieve healthy, inclusive and safe places which (amongst others) are safe and accessible, so that crime and disorder, and fear of crime, do not undermine the quality of life or community cohesion.

The application relates to the provision of two, five metre high poles and CCTV cameras to cover Jengers Mead Car Park. The proposal would principally serve as a parking management and enforcement tool, whilst also helping to reduce actual or perceived opportunities for crime or anti-social behaviour.

DC/25/0367 also proposed CCTV cameras but these were pan, tilt, zoom cameras. This proposal is for ANPR cameras instead- acknowledging the concerns raised by the planning committee in relation to privacy impact.

The applicant had previously explained that the cameras were required both for parking management and for improved surveillance to deter antisocial behaviour (particularly towards the parking management company). However, in light of the previous refusal and concerns raised by the Planning Committee, the cameras are now to be limited to fixed ANPR software which captures a cropped area within the parking spaces to just record the front section of the parking bay and the number plate of the vehicle.

As such there is a reasoned justification for the installation of CCTV cameras at the site. The principle of development is therefore considered acceptable, subject to material considerations detailed below.

Design and Appearance:

Policies 25, 32, and 33 of the HDPF promote development that protects, conserves and enhances the landscape and townscape character from inappropriate development. Proposals should take into account townscape characteristics, with development seeking to provide an attractive, functional and accessible environment that complements the locally distinctive character of the district. Buildings should contribute to a sense of place, and should be of a scale, massing, and appearance that is of a high standard or design and layout which relates sympathetically to the landscape and built surroundings.

The application relates to the installation of two standard 5 metre high black powder coated steel poles with the camera on the top. The first would be located at the southern end of 'Atlantic House' adjacent to the blank three storey wall with no windows. The second would be installed adjacent to 3 Jengers Mead to the rear of the existing footway, adjacent to a blank three storey section of wall.

The proposal is considered to be acceptable, and the design of the installations are appropriate in this context. The cameras will sit against a backdrop of taller buildings and will not appear overly prominent. The cameras will be intentionally clearly visible from within the site to help in car park management and enforcement.

Residential Amenity:

Policy 33 states that development should consider the scale, massing and orientation between buildings, respecting the amenities and sensitivities of neighbouring properties.

Concern was previously raised by local residents and businesses relating to privacy and the installed cameras being able to view inside of private businesses/ properties/ gardens.

The previous application was refused for the following reason at Planning Committee:

Given the PTZ technology solution, the proposal is considered to be overly intrusive in nature by way of loss of privacy and perceived loss of privacy, contrary to Policy 33 of the Horsham District Planning Framework (2015).

In light of this, the cameras have been replaced with ANPR cameras. These are fixed cameras that focus on the front of the parking bays and the number plates of the vehicles. No imagery is recorded or retained, and the cameras cannot be redirected towards nearby properties, windows, amenity areas etc. The cameras are not operated in real time or manually controlled and instead isolate and process only the number plate and the front portion of the vehicle.

The application does not propose any new lighting. The cameras will operate using existing lighting infrastructure, which has been in place to safely serve the car park and commercial premises. The cameras are passive and do not emit any light themselves. Therefore, there will be no impact on lighting levels or any additional light spill as a result of this proposal. It is agreed that good lighting contributes to public safety and reassurance. However, as there is no change proposed to the site's lighting, the application remains neutral in this regard and fully compatible with existing conditions.

Concern has also been raised by members of the public in relation to the ongoing management of the car park and increased parking fees. This is outside of the planning system and planning permission is not required to increase or reduce parking fees or to amend the way fees are charged. It is noted that parking enforcement is already in place at the site and the cameras will help with this as well as monitoring anti-social behaviour.

Officers are confident that there will be no overlooking given the details provided in relation to the operation of the cameras, and there will be a benefit to the private car park of effective and fair enforcement.

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) and that every planning permission granted for the development of land in England shall be deemed to have been granted subject to the condition that development must not be begun unless a Biodiversity Gain Plan has been submitted to the planning authority and the planning authority has approved the Plan.

The Biodiversity Gain Plan must show how the development will achieve the required minimum 10% BNG using the statutory biodiversity metric tool, and must demonstrate how the habitats will be managed

and maintained for 30 years, starting from the date the development is completed. Off-site gains and significant on-site enhancements will be secured over this period by way of a Legal Agreement.

The Applicant has demonstrated that the development is exempt from the requirement to achieve a minimum 10% BNG by reason of:

- The development qualifies as 'de minimis' under Regulation 4 of the Biodiversity Gain Requirements (Exemptions) Regulations 2024

Other Matters

It is noted from the site visit that there are existing CCTV cameras on one of the buildings very near to where one of the pole-mounted cameras is proposed. It is understood that this CCTV unit is managed separately. The applicants have stated that this existing CCTV system does not cover all parts of the car park and they do not have access to control of this system or to its footage.

This application relates to the installation of two cameras on poles only and does not have any bearing on parking charges being increased or reduced. These can be amended without planning permission as this is a privately managed car park.

Conclusion:

The provision of CCTV at this site to enforce the parking provision is considered a reasonable and acceptable proposal and the application is recommended for approval.

Recommendation: Application Permitted

Conditions:

2 **Standard Time Condition**: The development hereby permitted shall begin before the expiration of three years from the date of this permission.

Reason: To comply with Section 91 of the Town and Country Planning Act 1990.

3 **Regulatory Condition**: The development hereby permitted shall be maintained and operated in accordance with the approved details.

Reason: In the interests of visual and residential amenity in accordance with Policy 33 of the Horsham District Planning Framework (2015).

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/25/1199
(The approved plans will form Condition 1 on the Decision Notice of all Permitted applications)

Schedule of plans/documents **approved**:

Plan Type	Description	Drawing Number	Received Date
Supporting Statement	Data Management	NONE	22.07.2025

Details plan	PTZ Camera Details	21001-009-02 REV A	22.07.2025
Location & Block plan	CCTV Installation Location & Site Plan	21001-009-01 REV B	22.07.2025

DELEGATED

Case Officer sign/initial Kate Turner Date: 06.10.2025

Authorising Officer sign/initial Tamara Dale Date: 09.10.2025