



DELEGATED APPLICATIONS - ASSESSMENT SHEET

APPLICATION NO./ADDRESS:

DC/26/0183 Land at 516832 130750, Bishopric, 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/26/0182 Installation of 1No. BT Street Hub Unit and associated advertisement Under Consideration
panels on either side of the unit (*Planning Application*)

RELEVANT PLANNING POLICIES

The National Planning Policy Framework (NPPF)

Horsham District Planning Framework (2015):

Policy 12 - Strategic Policy: Vitality and Viability of Existing Retail Centres

Policy 14- Shop Fronts and Advertisements

Policy 25- Strategic Policy: The Natural Environment and Landscape Character

Policy 32- Strategic Policy: The Quality of New Development

Policy 33- Development Principles

Policy 34- Cultural and Heritage Assets

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)

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: The Bishopric is a historic route into Horsham, formerly under the gift of the Archbishop of Canterbury, with a long-standing market function still reflected today. The proposed street hub would sit within the visual context of the Grade II listed 20–22 Bishopric.

Due to its size, design and moving imagery, the hub would compete with the building's historic character, appearing incongruous and detracting from local amenity. Its addition to an existing hub nearby would be excessive and would not enhance the area's appearance.

More broadly, the incremental addition of signage, bins and telecoms cabinets contributes to street clutter, undermining the sense of place. The NPPF emphasises good design and creating attractive, welcoming environments. Ad hoc infrastructure, while convenient for operators, can lead to a muddled streetscape, with generic fixtures detracting from local character.

A more coordinated, place-led approach is needed to ensure new elements enhance the street and its context. As proposed, the development is objected to due to its adverse impact on local amenity and the setting of the listed building.

HDC Environmental Health: 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: Advice: -

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.

Neighbourhood Council Comments: Objection: -

- The proposals are out of keeping with the entry to Horsham town centre, serving no public benefit, only destroying the community feeling of this well-used pedestrian way.
- The proposal would be a safety hazard so near the junction; drivers will have their attention diverted to the sign instead of looking at the traffic in front of them.
- The advertising holdings would prove to be a safety hazard in terms of the pavement they take up. The footpaths on which it is proposed to site them can be busy with pedestrians especially on the Bishopric side as it is right outside KFC. Both are positioned near bus stops which also increase the footfall past the sign creating an obstacle. The area is already cluttered by a multitude of street furniture and access and navigation for pedestrians is already difficult. HDC recently made proposals and conducted a consultation to improve access in this area for cyclists and pedestrians: adding this hardware makes that an even bigger challenge.
- Members feel there should be fewer pulls on our attention to enable the community to be calmer and happier. There should be less electrical attention-grabbing brightly coloured moving advertising.

Representations:

12 representations have been received, objecting to the application for the following reasons: -

- The structure would be a blemish to the local area, looking out of place and distracting to road users
- The structure would limit the flow of pedestrian movement and clutter the pavement
- Negative impact on the character and appearance of the area
- An illuminated screen detracts from a heritage asset and spoils the overall aesthetics of a historical setting
- Requirement for public phones is now obsolete, owing availability of mobile phones
- 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
- Insufficient information has been provided regarding the public benefits of the smart technology and data collection functions
- 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.
- Limited community benefits arising from the proposal
- Insufficient information has been provided regarding sustainability and energy efficiency measures and who pays for the energy
- 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
- Concerns regarding the continuous power requirements of the proposal
- 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 wider social impacts of introducing additional digital advertising screens in the public realm.

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

Legislation

Regulation 3 of Part 1 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (as amended) requires that local planning authorities assess applications for express consent in the interests of amenity and public safety, taking into account the provisions of the development plan so far as they are material and other relevant factors. An excerpt of the regulation is set out below:-

Powers to be exercised in the interests of amenity and public safety

3.—

- (1) A local planning authority shall exercise its powers under these Regulations in the interests of amenity and public safety, taking into account—

- (a) the provisions of the development plan, so far as they are material; and
 - (b) any other relevant factors.
- (2) Without prejudice to the generality of paragraph (1)(b)—
 - (a) factors relevant to amenity include the general characteristics of the locality including the presence of any feature of historic, architectural, cultural or similar interest;
 - (b) factors relevant to public safety include—
 - (i) the safety of persons using any highway, railway, waterway, dock, harbour or aerodrome (civil or military);
 - (ii) whether the display of the advertisement in question is likely to obscure, or hinder the ready interpretation of, any traffic sign, railway signal or aid to navigation by water or air;
 - (iii) whether the display of the advertisement in question is likely to hinder the operation of any device used for the purpose of security or surveillance or for measuring the speed of any vehicle.
- (3) In taking account of factors relevant to amenity, the local planning authority may, if it thinks fit, disregard any advertisement that is being displayed.
- (4) Unless it appears to the local planning authority to be required in the interests of amenity or public safety, an express consent for the display of advertisements shall not contain any limitation or restriction relating to the subject matter, content or design of what is to be displayed.

It is noted that a number of representations have been received on the application, and these have been considered in so far as they relate to the amenity and public safety considerations of an application for advertisement consent.

Amenity

The NPPF states that poorly placed advertisements can have a negative impact on the appearance of the built and natural environment. Advertisements should be subject to control only in the interests of amenity as well as public safety, taking account of cumulative impacts.

Local policy reinforces the legislation and national policy aims. 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.

Policy 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 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 *“within the plan area, 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 proposal would see the introduction of 2 large, illuminated advertising screens (front and rear), cased in black metal chassis sited on the pavement of Bishopric, located within the defined extent of Horsham Town Centre and within the designated Horsham Town Centre Primary Shopping Area.

Bishopric forms the western edge of the Horsham Town Centre, characterised mainly by active ground floor commercial frontages with associated building signage and residential above. Within the setting of the application site there are various pieces of street furniture, including litter bins, a cycle rack, telegraph poles and lighting columns. A-boards, where present, are generally sited outside of the related commercial premises, as required by the Council's A-board policy.

The proposed, black-framed structure, incorporating LED screens, 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. The full-colour digital displays (0.9m x 1.63m) would introduce a modern and visually prominent form of advertising that contrasts and stands out amongst the prevailing character. This section of the pavement is relatively free from clutter, and the large, black-framed structure fails to integrate with the established street scene and, together with its bright LED screens, would have a significantly greater visual presence than surrounding features.

Whilst there are some illuminated shopfronts within the vicinity, these are integrated into the buildings, with the lights angled downwards and orientated towards the street. In contrast, the proposed advertising panels would be enclosed within large black metal casings, competing with the height of the fascia boards on the shops in the locality. The large, illuminated advertising display would stand in stark contrast to the backdrop of the townscape and the market town aesthetic of Horsham. It would be clearly visible from afar and would detract from the public amenity of this part of the street. The application site is located approximately 9 metres west of the Grade II Listed 20-22 Bishopric and due to its size, design and digital imagery would compete with the historic character of the listed building and would appear incongruous, detracting from the public amenity of this part of the street.

For the reasons set out above, it is considered that the proposed advertisement would unduly harm to the visual amenity of the area.

Public Safety

The Advertisement Regulations state that factors relevant to public safety include the safety of persons using any highway; whether the display of the advertisement in question is likely to obscure or hinder the ready interpretation of any traffic sign and whether the display of the advertisement in question is likely to hinder the operation of any device used for the purpose of security or surveillance or for measuring the speed of any vehicle.

West Sussex County Council, in its capacity as the Local Highways Authority, has raised no objection, stating that the proposed location of the hub is not anticipated to obstruct pedestrians using the footway, as sufficient space would remain for pedestrians to manoeuvre around the Street Hub. Whilst these comments are noted, the submitted 'Proposed Site Plan 002' identifies the width of the adopted pavement between the hub and 24 Bishopric (KFC) as 3.8 metres. This measurement does though include the private forecourt of 24 Bishopric, which once discounted leaves an actual adopted pavement width of approximately 2.1 metres. There is a clear distinction between the adopted pavement and the forecourt, demonstrated by the differing materials. While the forecourt is currently unobstructed there is no guarantee this will remain the case and the occupiers could follow the example of 26-28 Bishopric, by placing seating on this forecourt without requiring planning permission or a licence.

The site lies within the Primary Shopping Area of Horsham Town Centre, Policy 13 of the HDPF, and this section of pavement is frequently busy with pedestrians. Given the function of the street, the reduction in the width of the pavement alongside the Street Hub would have an obstructive effect. It would compromise people's ability to pass one another comfortably, making movement more difficult and requiring people to give way or wait in order to pass.

The proposal would diminish the successful movement function of the public realm along this section of Bishopric and undermine its role as both a thoroughfare and destination within the town centre. The

introduction of a large, fixed structure in this location would reduce the effective usable width of the pavement, potentially creating a pinch point. As such, pedestrian flow would be disrupted, particularly during peak periods, and conflict between users would be likely, including those with mobility impairments, pushchairs, or other accessibility needs.

Therefore, the proposal is considered to have an unacceptable impact on the function and usability of the highway network and would be contrary to Policies 40 and 41 of the HDPF and Policy HB7 of the HBBNP.

Notwithstanding the above, the siting of the advertisement would not obstruct road signage or sightlines and, given the nature of Bishopric, changing images would not be expected to cause significant potential for harmful distraction. The submission sets out that the advertisement would have an illumination not in excess of 600 cd/m² between 'dusk and dawn'. This would exceed the maximum of 500 cd/m², as set out in West Sussex County Council's Standing Advice for Illuminated Adverts. It is though considered that the increase in intensity would not be particularly distinguishable, and the level of illumination would not result in harm to highway safety.

Conclusion

The advertisement, by reason of its scale, illumination and siting 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 Grade II Listed 20-22 Bishopric. 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.

The advertisement, by reason of its siting and scale, would adversely impact on the free flow of pedestrians along Bishopric, to the detriment of public safety and contrary to Policies 40 and 41 of the Horsham District Planning Framework 2015 and Policy HB7 of the Horsham Blueprint Business Neighbourhood Plan 2019-2036.

Recommendation: Application Refused

Reason(s) for Refusal:

1. The advertisement, by reason of its scale, illumination and siting 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 Grade II Listed 20-22 Bishopric. 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.
2. The advertisement, by reason of its siting and scale, would adversely impact on the free flow of pedestrians along Bishopric, to the detriment of public safety and contrary to Policies 40 and 41 of the Horsham District Planning Framework 2015 and Policy HB7 of the Horsham Blueprint Business Neighbourhood Plan 2019-2036.

Plans list for: DC/26/0183

(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	NONE	02.02.2026
Supporting Statement	Anti-social behaviour management plan	NONE	02.02.2026
Supporting Docs	Declaration of RF public exposure conformity	NONE	02.02.2026
Supporting Statement	Lighting statement	NONE	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 render	NONE	02.02.2026
Supporting Statement	Product statement	NONE	02.02.2026
Elevation & Floor plan	Dimensioned	STH-001	02.02.2026
Location & Site plan	Existing	001	02.02.2026
Location & Site plan	Proposed	002	02.02.2026
Elevation plan	Existing site elevations	003	02.02.2026
Elevation plan	Proposed site elevations	004	02.02.2026

DELEGATED

Authorising Officer sign/initial Guy Everest Date: 09.07.2026