



DELEGATED APPLICATIONS - ASSESSMENT SHEET

APPLICATION NO./ADDRESS:

DC/26/0181

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/26/0180	Installation of 1No. BT Street Hub Unit and associated advertisement panels on either side of the unit (<i>Planning Application</i>)	Under Consideration
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RELEVANT PLANNING POLICIES

The National Planning Policy Framework (NPPF)

Horsham District Planning Framework (2015):

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

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 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.

HDC Conservation: 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.

WSSC 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.

Parish Comments:

No comments received

Representations:

11 representations were received objecting to the application 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.

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.

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 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 proposal would see the introduction of 2 large, illuminated advertising screens (front and rear), cased in black metal chassis sited on the pedestrianised highway of West Street, located within the defined extent of Horsham Town Centre and within the designated Horsham Town Centre Primary Shopping Area.

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.

The proposed advertisement would be sited on the western end of West Street near the open (pedestrianised) junction with Worthing Road and Bishopric. The structure would be almost 3m in height and 1.2 metres in width, featuring illuminated advertisements to display screens facing east and west (along West Street).

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.

While noted that the applicant has suggested a condition to require the digital display screens not display any moving or apparently moving images, this would not overcome the harm to amenity set out above. Similarly, although 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.

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.

The proposed advertisement would be sited on a pedestrianised highway where no road signage or sightlines would be compromised and, given the nature of West Street, the potential for distraction from changing images would not be expected to cause harmful distraction.

The siting of the advertisement would retain sufficient separation either side for servicing / emergency vehicles, and pedestrian movement would not be compromised in this location.

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 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.

Recommendation: Application Refused

Reason(s) for Refusal:

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.
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Plans list for: DC/26/0181

(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: 07.07.2026