

PL- Consultation- Conservation Officer response



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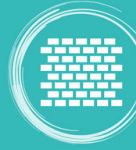
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From: Martyn White <Martyn.White@arun.gov.uk> **On Behalf Of** Conservation Officer
Sent: 17 March 2026 15:14
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Hebe Smith <Hebe.Smith@arun.gov.uk>
Subject: AB/148/25/PL

AB/148/25/PL

Address: Arundel War Memorial and outside 5-7 High Street Arundel BN18 9AB

Proposal: Replacement of 3 No cast iron street lighting units.

The Assets:

While a heritage statement has been provided it does not provide adequate information as required by NPPF paragraph 207, which places an onus on applicants to describe significance and assess impacts proportionately.

I have identified the following heritage assets of relevance to this proposal:

- The streetlamps by the War Memorial
- The streetlamp by the bridge
- The Arundel War Memorial
- The Arundel Conservation Area

The streetlamps by the War Memorial

The streetlamps by the War Memorial are described in the list entry as cast-iron cylindrical posts, fluted, with “Egyptian” capitals and fluted cross-bars. The lamps make a positive contribution to the distinctive historic character of Arundel Conservation Area and also have important group value.

The streetlamp by the bridge

The streetlamp by the bridge is similarly described as being a cast-iron cylindrical fluted post with an Egyptian-style capital, supporting a four-sided glass lantern carried on four scroll-shaped brackets, with acroteria at the upper corners and an ornamental air vent above. The lamps make a positive contribution to the distinctive historic character of Arundel Conservation Area.

The Arundel War Memorial

The Arundel War Memorial, unveiled in 1921 to commemorate those lost in the First World War and later updated with names from the Second World War, originally stood in the middle of the roadway before being set within a widened traffic island. It comprises a tall Wealden sandstone Latin cross with Celtic-style reliefs, standing on an octagonal three-stage plinth surrounded by a low brick and flint wall with railings. The inscriptions list 93 First World War and 26 Second World War names, and the memorial sits within a cobbled setting with flower beds integrated around its base.

The Arundel Conservation Area

The Arundel conservation area is expansive, encompassing the historic core of the town, Arundel Castle and the cathedral. One of the principal attractions of Arundel is its wealth of buildings representing architectural form and style through progressive periods, which form a cohesive and contained hillside town. This conservation area has a very strong historic character, with Arundel Castle, Arundel Cathedral, the numerous listed

and locally listed buildings of historic and architectural interest, along with the sympathetic street fittings (street lights etc.) resulting in a strong aesthetic quality. Similarly, the natural landscape and the river itself add to the character of the area.

The lamps make a positive contribution to the distinctive historic character of Arundel Conservation Area, and are seen in street views, in combination with other lamp posts and may of the listed and locally listed buildings in the locality

Comments

The application seeks consent to replace two Grade II listed streetlamps flanking the War Memorial and one listed streetlamp located to the west side of the bridge on Arundel High Street. The proposal would result in the removal of the original listed structures and therefore the total loss of their historic fabric and significance.

The application identifies that the lamp posts need to be replaced for safety reasons because they might crack and fail. But no condition survey or technical evidence has been provided to show this is true, or to show that repairs have even been considered. The NPPF requires clear evidence before causing harm to a listed structure, and this has not been supplied.

I note that Historic England have stated in their response that there have been successful repairs to Victorian cast-iron lighting columns along Brighton seafront. This indicates that conservation-led repair is often technically achievable, including the incorporation of modern LED units while retaining the original historic fabric.

While modern replicas are proposed, they cannot substitute for the authenticity of original structures and do not justify their removal unless it is first demonstrated that the existing are beyond repair. Further, I am unable to locate any information which identifies what is proposed to happen to the existing listed lamp columns once removed.

It is also acknowledged that the lamp beside the bridge may date from the 1970s (or later). I am also aware that anecdotal evidence suggests that it was used as a model for later replacements and not reinstated in its original position. If this is correct, clarity is needed regarding the whereabouts of the original lamp.

Historic England also identify four additional streetlamps situated on top of the listed wall in Maltravers Street. Although not individually listed, they are physically attached to the listed wall and therefore form part of that listing. Their replacement would also require listed building consent.

Need for Further Information

At present, the application does not demonstrate why replacement, rather than repair, is the only viable option. This evidence gap is significant. To enable an informed assessment, the following information is required:

- A Specialist Condition Survey - A full condition survey of all affected streetlamps (including those attached to the listed wall), undertaken by an appropriately qualified metal conservator. This should assess material condition, structural integrity, defects, and repairability.
- A comprehensive Heritage Impact Assessment - A more detailed HIA explaining the significance of each lamp, the contribution they make as a group, their relationship with the conservation area, and an assessment of the impact of the proposed replacement on that significance

Conclusion

Based on the information submitted, the proposal would result in the complete removal of the original listed streetlamps, and therefore the total loss of the heritage assets themselves, amounting to substantial harm under the NPPF (paragraph 214). No clear or convincing justification has been provided to demonstrate that repair is not feasible or that replacement is the only viable option, and no information has been submitted regarding what is proposed to happen to the existing listed lamp columns once removed. In the absence of a specialist condition survey and a robust heritage impact assessment, the application fails to meet the requirements of NPPF paragraph 207 and does not provide the evidence necessary to assess or justify harm. You should also consider the contents of section 16/66/72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended).

Martyn White
Principal Conservation Officer, Planning

T: 01903 737717
E: Martyn.white@arun.gov.uk

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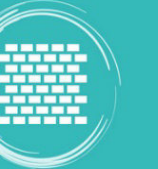
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