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Planning Department
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Littlehampton
West Sussex
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10 February 2025

Heritage Statement

Application Address: CK0090 – Land Outside 54 High Street, Bognor Regis, PO21
1SP

Dear Sir/Madam,

Please find enclosed Heritage Statement which accompanies the dual applications for Planning Permission and Advertisement Consent under the provisions of Regulation 62 of the Town and Country Planning Act 1990 and Regulation 9 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 for the installation of a Communication Kiosk at land outside 54 High Street, Bognor Regis.

A Heritage Statement has been prepared as the application site falls within the vicinity of locally listed buildings, a designated heritage asset in accordance with Reg 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990. In designating a Conservation Area, the process is relatively straightforward in that:

“(1)Every local planning authority—

(a) shall from time to time determine which parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance, and

(b) shall designate those areas as conservation areas. (Reg 69 (1)).

Within the above Act, Regulation 72 establishes the general duty of the Local Planning Authority to consider planning merits before approval. In particular, the Regulation states *"In the exercise, with respect to any buildings or other land in a conservation area, of any [functions under or by virtue of] any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area."* (Reg 72). The Heritage Statement will assess the proposal with respect to the Conservation Area and other identified heritage assets, considering the proposed communication kiosks relationship with the character and appearance of the locality as paramount. It is in accordance with the legislation that this application has been prepared and seeks approval for.

Introduction

The application letter provides an overview of the dual Planning Permission and Advertisement Consent application for the installation of Communication Kiosk with Arun District Council. The site has been considered in line with the aims of National and Local Policy in respect of supporting development in a sympathetic way, reflecting the current and ongoing development in the 21st century. The Heritage Statement is specific to land outside 54 High Street, Bognor Regis due to its position near locally listed buildings and supports the covering letter, plans and specification documents submitted as part of the proposal.

The Proposal

The installation of a communication kiosk along High Street, Bognor Regis could be perceived to cause less than substantial harm. As part of the proposal, rationalisation of the existing estate will remove some obstruction within the historic fabric while installing a new communication kiosk within an appropriate location. The proposed communication kiosk reflects the instantly recognisable telephone kiosk heritage, ensuring it provides open access for all. The new communication kiosk is a robust construction made of stainless steel which will aid reduction of vandalism and assist with ease of maintenance. Therefore, the perceived effect of the proposal will not be contrary to national or local policy, but simply reflect the ongoing evolution of streetscapes across the United Kingdom.

Through the installation of new communication kiosks, the proposed units will provide numerous public benefits. Telephony is still a key provision; it is an important lifeline for many people even with the proliferation of mobile phone use. Our kiosks are regularly used to report emergencies and are used by the vulnerable: 999, 111, Childline, Samaritans and Shelter are all examples of where service provision remains vital, along with the normal use of the general public. The communication kiosk will also offer the additional benefit of touchscreen information to assist users with wayfinding/mapping information. The full details of the communication kiosk can be found within the application covering letter and supporting documentation.

National Policy

National Planning Policy Framework (NPPF)

Through development within the urban environment, due to the historic nature of many towns and cities across the United Kingdom, development would occur within a heritage asset and sensitive areas. However, this does not prohibit development as long as there is a full and thorough consideration process. The NPPF requires a description of the heritage asset which is proportionate to the asset's importance. For each site, the relevant historical record would be consulted, and an appropriate assessment of the development would be undertaken, in line with the requirements of Para 200. The significance of the heritage asset should be considered when assessing the effect of the proposed development and the extent to which it will be affected. Where a development will lead to less than substantial harm to the designated heritage asset, the harm should be weighed against the public benefits of the proposal (Para 208).

Throughout the NPPF, there is a clear requirement of conservation and preservation of the heritage assets. Conservation, as detailed in the NPPF glossary is identified as *"The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance."* Preservation is *to do no harm* (The legal interpretation established in South Lakeland DC v Secretary of State for the Environment and Rowbotham [1991] 2 L.P.R. 97) to the heritage asset. The terms conservation and preservation are therefore concerned with sustaining the significance of heritage assets. These two terms embrace the idea that change can bring about opportunities to enhance the significance of heritage assets, both through changes to their physical presence, setting and the uses they fulfil.

Planning Policy Guidance (PPG)

Heritage

As set out in the NPPF, the assessment of the effect of a development nearby a heritage asset must be determined by its significance and the likely effect on its amenity. The PPG concurs with this assessment and supports appropriate development.

Importantly, the term significance is paramount in assessment. The guidance identifies *"Significance' in terms of heritage-related planning policy is defined in the Glossary of the National Planning Policy Framework as the value of a heritage asset to this and future generations because of its heritage interest. Significance derives not only from a heritage asset's physical presence, but also from its setting.*

As further detailed within the guidance *"Heritage assets may be affected by direct physical change or by change in their setting."* which a full assessment is required to understand its importance. This assessment must be from an early stage to support the development process.

The guidance identifies all heritage assets having a form of setting; however, the curtilage and the setting may be of varied extent. The guidance provides a broad definition, detailing best practice and stating *"The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations."* This detail can help support the identification of locations in relation to the heritage asset within the streetscape. This is important as the NPPF *"makes clear, significance derives not only from a heritage asset's physical presence, but also from its setting."*

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.

Historic England Guidance

Further specialist advice is contained within Historic England guidance, experts and specialists of England's historical character and culture. Within guidance GPA2, a statement supports the success of development proposals "if they are designed with the knowledge and understanding of the significance of the heritage assets they may affect" (Para 4). Further, Para 6 details a structured approach which should be taken by applications and heritage advisors when assessing and application. The individual stages are –

- Understand the significance of the affected assets
- Understand the impact of the proposal on that significance
- Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF
- Look for opportunities to better reveal or enhance significance
- Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change
- Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected

The cumulative impact of incremental changes must be considered as part of an application. As detailed in Para 28 *"The cumulative impact of incremental small-scale changes may have as great an effect on the significance of a heritage asset as a larger scale change. Where the significance of a heritage asset has been compromised in the past by unsympathetic development to the asset itself or its setting, consideration still needs to be given to whether additional change will*

further detract from, or can enhance, the significance of the asset in order to accord with NPPF policies” (Para 28).

Further guidance relating to the setting of heritage assets is also included within Historic England documentation, specifically GPA3. Acknowledging setting and decision-making, Para 17 states *“All heritage assets have significance, some of which have particular significance and are designated. The contribution made by their setting to their significance also varies. Although many settings may be enhanced by development, not all settings have the same capacity to accommodate change without harm to the significance of the heritage asset or the ability to appreciate it”* (Para 17). There is therefore an acknowledgment that development can occur within identified heritage assets, however a full consideration of the asset must be undertaken whereby some areas within the same heritage asset could be more suitable for development than other more sensitive settings.

A proportionate assessment of the application should be taken on to allow the significance of the heritage asset to be considered. The guidance sets out broad steps which should be followed for each application:

Step 1: Identify which heritage assets and their settings are affected

Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated

Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it

Step 4: Explore ways to maximise enhancement and avoid or minimise harm

Step 5: Make and document the decision and monitor outcomes

From the outset of the proposal, the development has been assessed in these terms and requirements to ensure the heritage assets is fully considered.

Conservation Principles: Policies And Guidance

This document provides a detailed viewpoint on development within the setting of heritage assets. A comprehensive framework is detailed which supports sustainable management, these are known as the Conservation Principles:

Principle 1: The historic environment is a shared resource

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

Principle 3: Understanding the significance of places is vital

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

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

Principle 6: Documenting and learning from decisions is essential

Similarly to the Historic England guidance above within GPA2 and GPA3, an appropriate process should be followed to allow a full assessment of a proposal within Conservation Areas. The guidance reiterates the importance of assessing and understanding the values of the historic asset and managing any change that occurs. In fact, Paragraph 25 states "The concept of conservation area designation, with its requirement 'to preserve or enhance', also recognises the

potential for beneficial change to significant places, to reveal and reinforce value.” (Para 25) which supports the concept of an ever-evolving historic urban environment. Within Paragraph 84, the document produces a pertinent point which is appropriate to this development, stating *“Change to a significant place is inevitable, if only as a result of the passage of time, but can be neutral or beneficial in its effect on heritage values. It is only harmful if (and to the extent that) significance is eroded”* (Para 84). Due to the ever-changing nature of the urban environment, while modern interventions have occurred and should be appropriately encouraged, the significance of the heritage asset must not be lost. Further, in accordance with Para 100, the completed works will be completely reversible to support any ongoing change within the streetscape.

Local Policy

Within the local policy documents of the Arun Local Plan, July 2018, the District Council sets out a number of ambitious but achievable aims to develop the Council. Arun DC, like the NPPF, sets a presumption in favour of sustainable development within Policy SD SP1. The proposed development for the deployment of a communication kiosk provides a sustainable solution to an element of street furniture which is currently in situ across many urban environments across the United Kingdom in an economically, environmentally, and social manner.

Policy D DM1 issues the desire for Arun to enhance their public realm. The Policy states development should: *“Make the best possible use of the available land by reflecting or improving upon the character of the site and the surrounding area, in terms of its scale, massing, aspect, siting, layout, density, building materials (colour, texture), landscaping, and design features”* (Policy D DM1) 6

As described in the details above, the proposed kiosk supports these aims and objectives. The policy further states "All new development will be expected to incorporate existing and new tree planting as an integral part of development proposals" (Policy D DM1). The aims of this Policy are achieved through the installation of a communication kiosk and the applicant's partnership with Trees for Cities. Further, the proposal will be respectful to these aims through the installation of an inclusive and open plan kiosk within an open area of pavement. Further, the proposal will be respectful to identified heritage assets within the area. This includes Listed Buildings and Conservation Areas as set out in Policy which states: "Designated heritage assets including listed buildings, structures and their settings; and Conservation Areas will be given the highest level of protection and should be conserved and enhanced in a manner appropriate to their significance" (Policy HER SP1).

As an integral part of the Communication Kiosk, the advertisement display on the reverse of the kiosk is required to be assessed on its own merits. While there is no specific policy regarding the installation of an advertisement, Policy D SP1 states any new development must: "All development proposals should seek to make efficient use of land but reflect the characteristics of the site and local area in their layout, landscaping, density, mix, scale, massing, character, materials, finish and architectural details" (Policy D SP1). While one frontage of the Communication Kiosk would contain an advertisement display, the primary use of the kiosk is for telecommunication purposes. The open and inclusive design will ensure the communication equipment is accessible to all, and the style of the kiosk ensures the use is clear and legible to any passer-by. While some effect maybe perceived within or nearby a heritage asset, the kiosk will provide a level of enhancement through its design and public benefits to support its approval.

The installation of the Communication Kiosks across the District Council supports the need for appropriate telecommunication equipment. Through the overall provision as set out across Bognor Regis and Littlehampton, the guidance as detailed in Policy TEL DM1 will be met. Specifically, the Council's aims to ensure *"The proposal will not have an unacceptable impact upon the landscape, sites protected for nature conservation or heritage assets; e. The proposal will not have an adverse effect on the amenity of local residents"* (Policy TEL DM1).

The installation of the communication kiosk will provide a necessary and desirable public benefit, which holistically achieves the Councils development goals.

Locally Listed Building Appraisal

In accordance with Supplementary Planning Document, Buildings or Structures of Character, Sept 2005 prepared by Arun District Council, a list of sites has been identified. While the buildings and structures are non-statutory, the Council can take into account the effect of these buildings as material considerations. This document supports Policy GEN22 of the Local Plan, 2003 which states *"Planning permission will not be granted for development resulting in the loss of existing buildings and structures of interest and importance which are attractive in their own right or which contribute to the character and appearance of an area. Alterations, extensions or other development which would adversely affect the appearance or setting of such buildings or structures will not be permitted"* (Policy GEN22).

The criteria for the selection of buildings are stated below:

- 1) Buildings of outstanding design, detailing, appearance or special interest because of the use of materials.

- 2) Buildings which are extremely good examples of traditional or established style, or unusual type.
- 3) In special cases, buildings or structures which contribute towards the local townscape or have important historical associations.
- 4) All buildings must be largely intact and not adversely affected by later extensions or alterations.
- 5) Preferably, although not exclusively, they should make a positive contribution to their surroundings or the street scene.

The application site has been identified to be in the vicinity of a building or structure which displays at least one of these characteristics. The buildings include:

Address	Criteria
59 High Street	2-5
57 High Street	2-5
51 to 53 High Street	2-5
45 to 47 High Street (HSBC and Western Amusements)	2-5

Site Appraisal

The proposed application site is located along another main retail street of Bognor Regis. The High Street which runs east to west, contains further commercial outlets to the south of the main station building towards the coast. The ground floor properties all have an active frontage, with numerous colours and branding at pedestrian level. The pavement is wide, with a relatively coordinated line of street furniture including bus shelters, cycle hoops and bins towards the roadside kerb edge.

The installation of a communication kiosk will support the telephony coverage of the area within a structure of high build quality and heritage design. The proposed communication kiosk will ensure a base level coverage of telephony provision within an accessible and inclusive kiosk while including additional public benefit of the touchscreen. The proposed communication kiosk will sit within an area of retail context and have a limited effect on pedestrian flow. If any harm is perceived, the public benefit of the proposed communication kiosk, as described above, would support this application.

The local area has an overly commercial context, with continuous ground floor commercial frontages along the high street. The style and finish of the buildings are generally neutral in character, with some being of a negative contribution towards the overall environment. On the opposite side of the road, opposite the application site, some of the building styles and design hold little merit. However, buildings to the south-east are far more positive in nature and have been identified on the local list as such. The installation of the kiosk will not be wholly detrimental on the views or enjoyment of the buildings which positively contribute towards the streetscape. apart from one building to the south-west which is slightly more

positive in nature. The area does not lie within a Conservation Area, nor does the proposed communication kiosk affect the curtilage or setting of a Listed Building. The proposed communication kiosk with its traditional design and high build quality will reflect and enhance the identified local character.

The proposed communication kiosk is some distance from an identified crossing and traffic light. The pavement width is wide enough so the installation will not affect pedestrian flow or likely desire lines. The integrated advertisement display will be subject to the below conditions to ensure continued operational management. Therefore, the proposal will not create public safety conflict with National or Local aims.

Proposed Conditions

In order to ensure the ongoing compliance with the agreed operation and to alleviate any perceived visual amenity and public safety concerns of the advertisement display, the below conditions have been suggested to be included as part of the decision notice. These are in line with the six tests for conditions according to the NPPF. The standard conditions, as detailed in Schedule 2 of the Advertisement Regulations, 2007, are to be contained within any advertisement consent approval.

1 - That the display of the advertisement (s) shall be permitted for a period of five years from the date of this decision.

2 – The Standard Conditions (Schedule 2, Regulation 2(1))

2.1. No advertisement is to be displayed without the permission of the owner of the site or any other person with an interest in the site entitled to grant permission.

2.2. No advertisement shall be sited or displayed so as to—

(a) endanger persons using any highway, railway, waterway, dock, harbour or aerodrome (civil or military);

(b) obscure, or hinder the ready interpretation of, any traffic sign, railway signal or aid to navigation by water or air; or

(c) hinder the operation of any device used for the purpose of security or surveillance or for measuring the speed of any vehicle.

2.3. Any advertisement displayed, and any site used for the display of advertisements, shall be maintained in a condition that does not impair the visual amenity of the site.

2.4. Any structure or hoarding erected or used principally for the purpose of displaying advertisements shall be maintained in a condition that does not endanger the public.

2.5. Where an advertisement is required under these Regulations to be removed, the site shall be left in a condition that does not endanger the public or impair visual amenity.

Reason: The conditions are imposed by virtue of the Regulation 2(1) of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

3 - There shall be no moving images, animation, video or full motion images displayed unless otherwise permitted by this consent.

Reason: In the interests of amenity and in order to retain effective planning control.

4 - In the hours of darkness, the advertisement display luminance shall be no greater than 300cd/m² in accordance with the recommended maximum night-time luminance value set out in Table 10.4 within the Institution of Lighting Professionals - Professional Lighting Guide (PLG 05) 'Brightness of Illuminated Advertisements Including Digital Displays' (or its equivalent in a replacement guide) in cd/m².

Reason: In the interests of amenity, public safety and in order to retain effective planning control

5 - In daylight hours, the advertisement display luminance shall be controlled in order to reflect ambient light conditions (to ensure it is neither too bright or too dull), and shall at all times be no greater than the recommended maximum daytime luminance values set out in Table 10.5 within the Institution of Lighting Professionals - Professional Lighting Guide (PLG 05) 'Brightness of Illuminated Advertisements including Digital Displays' (or its equivalent in a replacement guide) in cd/m².

Reason: In the interests of amenity, public safety and in order to retain effective planning control.

6 - Unless otherwise permitted, the minimum display time for each advertisement shall be 10 seconds and the advertisement shall not include any features which would result in interactive messages / advertisements being displayed.

Reason: In the interests of amenity, public safety and in order to retain effective planning control.

7 - The interval between successive advertisements shall be no greater than 1 second and the complete display shall change without effect. The display to include a mechanism to default to a blank or black screen in the event of malfunction, or if the advertisement is not in use.

Reason: In the interests of amenity, public safety and in order to retain effective planning control

Conclusion

The dual application for Planning Permission and Advertisement Consent has been submitted for the installation of the communication kiosk at land outside 54 High Street, Bognor Regis. This Heritage Statement was prepared to support the application as the site falls within the vicinity of locally listed buildings. It is considered that the proposal fully understands the significance of the identified heritage asset and concludes the communication kiosk will be an appropriate form of development in accordance with national and local policy. The proposal reflects the changing nature of urban streetscapes while providing a significant public benefit. I trust the above Heritage Statement and enclosed documentation clearly illustrate the details of the proposal.