

Deputy Chairman: Hugh Coster, Phoenix House, 15 East Avenue, Middleton-on-Sea, Bognor Regis,
West Sussex. PO22 6EG

20th November, 2018

Amber Willard,
Planning Officer
Arun District Council,
Maltravers Road,
Littlehampton,
BN17 5LF

Dear Madam,

**Re: Application BR/254/18/A 4 Non-illuminated advertisements,
Hothamton Gardens & Surrounding Areas, Bognor Regis.**

We write on behalf of our membership, some of whom live within 250 metres of that above site, to **object** to the above application for the following reasons:

- 1. BREACH OF REGULATIONS.** This application is under the Town & Country Planning (Control of Advertisement) (England) Regulations 2007 (as amended) and under those regulations, Schedule 3 Part 1 (Specified Classes and Conditions) the signs applied for fall under Class 3 (Miscellaneous temporary advertisements). They do **NOT** fulfil the requirements of any other class, most particularly not under Class 1 because they are not "wholly for the purpose of announcement or direction...which (a) is reasonably required to be displayed for the safe or efficient performance of those functions..." **Under Class 3 this application breaches the regulations and also must have conditions applied as detailed below:**
 - 1a** Under class 3C(1) (Conditions and Limitations) the regulations state that: "not more than one advertisement shall be displayed at any one time on each road frontage of the land..." In this application a sign is placed on the Queensway frontage on the North East corner of the land. A sign is also placed on the junction of Queensway and Canada Grove/Argyle Circus. This latter sign is also double sided, and thus must in addition qualify as two signs. All of this breaches the regulations.
 - 1b** Under Class 3C(2) the regulations state: "No advertisement may be displayed except while the relevant works are being carried out." No planning permission has been granted for this site so there is no question of any works being carried out at this time. This application is therefore premature and incomplete, as there is no information as to the signs' content and therefore no

information for the LPA as to the "relevant works" on which to base a decision. For this reason this application should be refused but, at the very least, a condition should be placed on any approval that no signs should be erected until work has commenced.

1c Excessive size. All the proposed signs are to be positioned less than 10 metres from the highway, and there is no indication as to content and therefore no indication that they relate to more than 1 person. Under Class 3C(3)(a)(ii) the signs are therefore limited to 2 square metres maximum. The application plans show that three of them [North West corner (A), North East corner (B) and South East corner (C)] exceed this measurement. Class 3C(3)(a) also states that "no advertisement may exceed in aggregate---" The sign proposed for the North West corner (A) is double sided and therefore in aggregate considerably exceeds the maximum allowed of 2 square metres. The signs therefore breach the regulations and this application should be refused.

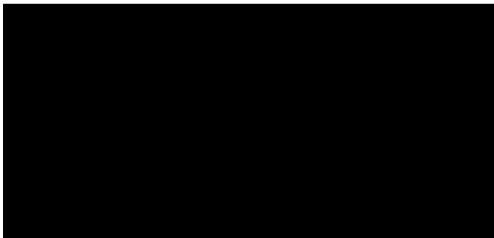
2 Under the Regulations Part 1, Para 3(1)(2)(3)(4) A Local Planning Authority "shall exercise its powers under these Regulations in the interests of amenity and public safety..." This application breaches this part of the regulations in the following respects:

2a Public Safety. All four of the proposed signs are to be immediately adjacent to the highway, and three of them are excessively large for these locations providing considerable distractions to road users (including pedestrians) at points where there are already challenging circumstances with vehicles and foot traffic arriving from several directions at once (including car users leaving/returning to the car park on foot). These are the Queensway/Crescent Road/exit from Multi-storey junction (Sign B), the Queensway/Canada Grove/Argyle Circus junction which also has a bus stop close by (Sign A), and the east side Waterloo Square/West Street/High Street junction (Sign C). Public safety is paramount and certainly takes precedence over the known trivial intended purpose of these signs, and for this reason alone this application should be refused.

2b Amenity. Government guidance on amenity is available in Government Circular 03/2007, also the Communities and Local Government booklet "Outdoor Advertisements and Signs: A Guide for Advertisers." In reference to these there are statements such as: "in assessing amenity, the planning authority will always consider the local characteristics of the neighbourhood" and also "In practice, 'amenity' is usually understood to mean the effect upon visual and aural amenity in the immediate neighbourhood of displaying the advertisement." Two of the proposed signs will significantly clash with the nature of their immediate neighbourhoods. Sign C (South East corner of the site) is immediately adjacent to and faces onto a conservation area, and also is placed in a spot among the plants and greenery of the sunken gardens, with no buildings anywhere adjacent. In addition it is large, and is very clearly damaging to the amenity of the site itself. Sign D (West boundary of the gardens) again is placed within a backdrop of plants and greenery on the edge of the gardens, no buildings adjacent, with no thought as to the amenity and

verdant appearance of its site, which it immediately destroys. If the Planning Authority has any consideration for the amenity of the gardens, **as is required by government guidance**, it will not permit these signs to be placed in those locations.

We believe the above are sound planning reasons why this application should be refused and we request you to recommend refusal to the Development Control Committee. **We should be grateful if you would supply each of the Development Control Committee members with a copy of this letter, as all the above information needs to be in front of them. Please confirm to us that you will do this, as it is very important that they should be aware of all the detail of the above reasons for our objection to this application. With respect, a simple Officer summary is not enough, and any withholding of the above information will be regarded as planning bias and pre-determination.**



Deputy Chairman.