

Recommendation Report for Planning Permission

REF NO: LU/200/25/PL

LOCATION: Pavement o/s 63 High Street
Littlehampton
BN17 5EJ

PROPOSAL: Removal of associated existing BT payphone(s) and kiosks and installation of 1 No BT Streethub Unit. This application affects the setting of listed buildings and is in CIL Zone 4 (Zero Rated) as other development.

SITE AND SURROUNDINGS

DESCRIPTION OF APPLICATION This application seeks to install 2 No. internally illuminated LCD display screens measuring approx. 1.905m (from corner to corner) on either side of a BT Streethub Unit that measures approx. 2.96m in height, 1.24m in width, and 0.35m in depth. This would follow the removal of 2 No. existing BT payphone kiosks nearby to the site.

SITE CHARACTERISTICS The site resides within the Littlehampton High Street that runs east to west and is met by shopfronts to the ground floor of two-storey terraces on both the north and south sides. The proposed sign sits within a gap between street furniture with a signpost and benches approx. 10m and 14m to the east and additional benches approx. 15m to the west. The site resides within a distinctly commercial space and serves primarily as a footpath for the space.

CHARACTER OF LOCALITY The area is distinctly commercial in nature, being located within the High Street and primary retail centre of Littlehampton. Surrounding uses and many upper-floor units are often residential, but the predominantly commercial development within the immediate surroundings informs the primary character of the site's locality.

RELEVANT SITE HISTORY

LU/201/25/A	2 No 1.905m internally illuminated LCD display screens, one on each side of the Streethub Unit.	
lu/26/25/a	Installation of 1 No. illuminated advertising display within communications kiosk with integrated defibrillator.	Refused 02-04-25 Appeal: Dismissed 22-09-25
lu/25/25/pl	Installation of 1 No. new communications kiosk with	Refused

integrated defibrillator and advertising display. This application is in CIL Zone 4 (Zero Rated) as other development.

04-04-25

**Appeal: Dismissed
22-09-25**

LU/178/25/PL

Installation of 1 No. new communications kiosk with integrated defibrillator and advertising display. This application is in CIL Zone 4 (Zero Rated) as other development.

Refused
06-10-25

LU/179/25/A

Installation of 1 No. new communications kiosk with integrated defibrillator and illuminated advertising display.

Refused
06-10-25

LU/201/25/A - This application is for advertisement consent for the LCD screens attached to the BT Streethub unit that is the subject of this application.

LU/25/25/PL & LU/26/25/A - These applications sought planning permission and advertisement consent for a similar style of advertisement board, alongside a narrow, attached booth with defibrillator. The proposals were refused on grounds of visual amenity and visual clutter, and they were subsequently dismissed on appeal. These proposals were a approx. 60m to the west of the current proposal.

LU/178/25/PL & LU/179/25/A - These applications sought planning permission and advertisement consent for the same type of development as LU/25/25/PL & LU/26/25/A, but this was located immediately adjacent and east of the current proposal. These applications were also refused on grounds of visual amenity and visual clutter.

REPRESENTATIONS

Littlehampton Town Council - Objection:

- The site and placement of the new BT Streethub unit are unsuitable.
- Support the removal of the existing payphones, and would in future consider supporting their replacement, but maintain that the proposal would have a negative visual impact on the street scene and detract from the newly regenerated High Street.
- The position of the proposal would significantly impact accessibility and impinge on the ability to deliver events as well as disturb activities such as the weekly market, all of which supports the economic vitality and safe environment of the High Street as set out in the Town Centre Strategy.

1 letter of Objection:

- The proposal is almost in the same application as LU/178/25/PL, but does not include a defibrillator. Object to an illuminated and overbearing advertising billboard being placed in our town centre. It will take up valuable pedestrian space, restrict accessibility, and obstruct views.

1 letter of No objection:

- A condition should be to ensure paving repairs use identical materials and pattern to the Littlehampton Town Centre materials and pattern.
- Noting a recent development that has not done this and is detrimental to the character of the High Street.

COMMENTS ON REPRESENTATIONS RECEIVED:

Comments noted.

CONSULTATIONS**CONSULTATION RESPONSES RECEIVED:**

Economic Regeneration - No objection:

- This is based on replacing an existing asset to a more modern kiosk.

Conservation Officer:

- It is concluded that the impact of the proposed development would result in no harm to the setting of the designated heritage assets, and therefore not harm their significance.

COMMENTS ON CONSULTATION RESPONSES:

Noted.

POLICY CONTEXT

Designations applicable to site:

Built-up Area Boundary.

Town Centre Retail Boundary.

Economic Growth Area.

Adjacent to Locally-Listed Buildings of Character (Non-Designated Heritage Assets).

Adjacent to Grade II Listed Buildings (Designated Heritage Assets).

Flood Zones 2 and 3.

Within an area with potentially high groundwater levels.

DEVELOPMENT PLAN POLICIES

[Arun Local Plan 2011 - 2031:](#)

SDSP1	SD SP1 Sustainable Development
SDSP2	SD SP2 Built-up Area Boundary
DDM1	D DM1 Aspects of form and design quality
HERSP1	HER SP1 The Historic Environment
HERDM1	HER DM1 Listed Buildings
WDM2	W DM2 Flood Risk

[Littlehampton Neighbourhood Plan 2014 Policy 1](#) The Presumption in Favour of Sustainable Development

Littlehampton Neighbourhood Plan 2014 Policy 2 A Spatial Plan for the Town

Littlehampton Neighbourhood Plan 2014 Policy 17 Buildings and Structures of Character

PLANNING POLICY GUIDANCE:

NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance

SUPPLEMENTARY POLICY GUIDANCE:

REPORT_1011(ODB)

POLICY COMMENTARY

The Development Plan consists of the Arun Local Plan 2011 - 2031, West Sussex County Council's Waste and Minerals Plans, The South Inshore & South Offshore Marine Plan and Made Neighbourhood Development Plans. The policies are published under Regulations 19 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

DEVELOPMENT PLAN AND/OR LEGISLATIVE BACKGROUND

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states:-

"If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise."

The proposal is considered to conflict with relevant Development Plan policies in that the proposed works would result in demonstrable harm to the character and appearance of the street scene.

Section 70(2) of the Town and Country Planning Act 1990 (as amended) provides that

(2) in dealing with an application for planning permission the authority shall have regard to -

- (a) the provisions of the development plan, so far as material to the application,
- (aza) a post examination draft neighbourhood development plan, so far as material to the application,
- (b) any local finance considerations, so far as material to the application, and
- (c) any other material considerations.

OTHER MATERIAL CONSIDERATIONS

Appeal Decision ref: APP/C3810/W/25/3366490 was for a similar form of advertisement development located approx. 60m to the west within the High Street in a similar context. The appeal was dismissed, upholding reasons for refusal pertaining to harm to the character of the area and visual amenity.

There are no other material considerations to be weighed in the balance with the Development Plan.

BIODIVERSITY NET GAIN

Based on the information available, this permission is exempt from the requirement to provide a biodiversity gain plan under Paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990. The following exemption applies:

This planning permission is de-minimis as the development does not impact an onsite priority habitat and the development impacts less than 25 square metres of onsite habitat that has a biodiversity value greater than zero and less than then 5 metres in length of onsite linear habitat.

CONCLUSIONS**PAYPHONE REMOVALS AND CONDITIONS**

The payphone kiosks proposed for removal reside outside of the red edge. It is, therefore, unclear that they could form part of any permission for this application if it were given. Discussions with the agent

identify that the use of planning conditions to secure the removal of off-site kiosks on similar projects has been adopted by other Local Planning Authorities. Planning conditions can only apply to area within the red/blue edge of application sites unless they are considered Grampian Conditions, which are usually a last resort and often only used on larger schemes to secure the provision of essential infrastructure. In this instance, with the understanding that the proposal site, the Payphone Kiosks, and the connecting land are all within the public highway boundary and thus, owned by West Sussex County Council, the application of a blue edge to the submitted plans to encompass the Payphone Kiosks in question was suggested to the agent during the lifetime of the application, but this was not considered necessary by the agent. Ultimately, the determination of this application means it has not been necessary to apply any such conditions, but the Local Planning Authority are of the mind that conditions to secure the removal of the kiosks would not have been appropriate with the application in its current form.

PRINCIPLE

The proposal is located within the Built-up Area Boundary where the principle of development is acceptable subject to consideration of relevant Development Plan policies in accordance with Arun Local Plan (ALP) policy SD SP2.

By virtue of being within the Built-up Area Boundary, the proposal is in accordance with Littlehampton Neighbourhood Development Plan (LNDP) policy 2.

DESIGN AND VISUAL AMENITY

The proposed BT Streethub unit (hereafter referred to as the hub) is an approx. 3m tall, 1.25m wide advertisement board with the capability of providing improved localised 5G network coverage, free UK calls through a speaker and microphone system, and has 2 No. LCD screens that are approx. 1.7m tall and 0.95m wide. The screens would be internally illuminated, have 'instant' transitions between advertisements, advertisements no less than 10 seconds in duration, and the applicant has identified a willingness to agree to a condition that states the screens shall not exceed 600cd/m² between dusk and dawn.

The screens would have an in-built sensor that would adapt the illuminance levels to respond to the ambient light of the environment. The proposed maximum and minimum illuminance levels would be 5000cd/m² and 600cd/m², respectively. The night-time illuminance levels proposed do not conform to the recommended illuminance levels for a >5sqm advertisement within an E4 Environmental Zone (Urban, high district brightness; such as town centres) as outlined within Tables 10.1 and 10.4 of The Institute of Lighting Engineers' Professional Lighting Guide 05/23 "The Brightness of Illuminated Advertisements including Digital Displays" (2023). As such, the proposed illuminance levels at night are above the levels outlined by relevant guidance.

The hub would sit within a relatively clear section of the High Street but follows a line of existing street furniture that can be found approx. 10m to the east. There is sufficient clearance between nearby street furniture that the signage would not contribute to an excessive proliferation of visual clutter within this section of the street. However, notwithstanding the clearance of the immediate surrounding area, the hub is situated relatively close to the nearest shopfront, and is a large, prominent, and bright form of advertisement that is significantly larger than any of the nearby street furniture, and contrasts the more traditional, non-illuminated signage found within the High Street.

The High Street is an area with a predominantly retail character, featuring rows of shopfronts, hoardings, and in-window advertisements. The High Street often also features smaller A-boards which are frequently placed and removed but they are present more often than not for pedestrians within the High Street. Advertisement and other signage within the High Street are primarily located within/on shopfronts at either side of the street. There are also no illuminated advertisements within the vicinity. The location is not suitable for large, prominent, and bright advertisement screens with changing advertisements as

this would be incongruous, visually jarring, draw the eye away from existing shopfronts, and detract from the overall character of the High Street.

It is noted that had this proposal been successful, a condition would likely have been sought to restrict night-time illuminance levels to a maximum of 300cd/m². However, the proposal, overall, was not found acceptable in this location due to the above-mentioned harms. As such, this condition was not sought.

In the interests of preserving visual amenity, had this application been approved, a condition would have also been sought to ensure that any works to the existing paving/footways necessary in order to install the proposed hub would be made good with materials that match the existing paving in material, finish, design, and layout. Had the removal of the kiosks also formed part of any permission under this application, the hardstanding below the kiosks would also have been conditioned in the same manner.

The 2 No. BT payphone kiosks proposed for removal are located approx. 35m to the east underneath a prominent tree. They are weathered and do little for the visual amenity of the area and are understood to see limited use. Their siting is not directly associated with the proposed location of the hub, and while their removal/replacement is not generally opposed, it cannot be said to serve as any mitigatory factor against the identified harms of the proposal given their separation and difference of character.

For the reasons outlined above, the proposed development would be incongruous and result in harm to the character, appearance, and visual amenity of the street and is therefore, contrary to Arun Local Plan policy D DM1.

FLOOD RISK

The site is located within Flood Zone 2 and 3 and in an area with potential for groundwater flood risk. However, given the nature and scale of the development, it would not result in the increase of flood risk on site or elsewhere, nor would it increase the vulnerability of the site.

The proposal is in accordance with ALP policy W DM2.

HERITAGE

The site is located adjacent to 2 No. Grade II Listed Buildings (67/69 High Street and 1 East Street, and 72 High Street). It is also adjacent to several Locally Listed Buildings (Nos. 57, 61/63, 65, 70 & 74 High Street), which reflect the historic development and architectural character of the area.

No. 67/69 high street and 1 East Street is a mid-to-late C18 three storey building located on the corner of East Street and the High Street. The principal elevation features painted stucco whilst the return to East Street is painted brick. The ground floor is in retail use with late C19 shop fronts. There is a canted bay window on the East Street elevation that is similar in style to those along the High Street. There is also a modern shop front on northern end of No. 1 East Street and the building has a hipped tiled roof with Parapet. It is of architectural and historical interest.

Nos. 61 - 69 High Street (odd) form a group and the transition between the town centre and the historic development of East Street. The group is of historical importance.

No. 72 High Street is a Mid-C19 three storey building featuring stucco. The facade features stucco architraves that frame sash windows with glazing bars. There is a moulded cornice with a pronounced cyma reversa profile, surmounted by a parapet. The ground floor is a cafe with shopfront and an oversailing fascia. The entrance is set within flush-panelled reveals and the building derives its significance from architectural and historical interest.

The proposed hub unit is large and prominent, but in terms of the significance and special interest of the

nearby heritage assets, their value is drawn from architectural and historic interest. The architectural integrity and historic value of the nearby listed buildings and locally-listed buildings would not be directly prejudiced by the proposals. Additionally, while the hub is relatively large and prominent compared to surrounding street furniture, it is not of a scale that would obscure views of the buildings in any meaningful way or disrupt the way these buildings are understood. As such, it would not result in harm to the listed buildings.

Overall, while the proposal would result in harm to the character and appearance of the High Street generally by virtue of being an incongruous and overly prominent form of advertisement, the proposal would not result in harm to the significance or the setting of the listed buildings, and on balance, would not harm the special interest of the Locally-Listed Buildings. The proposal is in accordance with ALP policies HER SP1 and HER DM1, and LNDP policy 17.

NEIGHBOURING RESIDENTIAL AMENITY

The kiosk would be located on the land opposite 63 High Street. Due to its scale and its position, the kiosk would not result in any overbearing, overshadowing, or overlooking effects to neighbouring properties.

The proposal is, therefore, in accordance with Arun Local Plan policy D DM1 in that it would not result in unduly harmful adverse overshadowing, overlooking or overbearing effects on neighbouring properties.

PUBLIC BENEFITS

The proposal would result in some material public benefits in the form of improved local network coverage, free UK calls with a microphone and speaker system, and general advertisement of business, local or otherwise.

From review of Ofcom network coverage within the area, the site benefits from either good outdoor and indoor, or good outdoor and variable indoor network coverage, so the benefits of a potentially improved local network coverage is given limited weight.

The free UK calls is also afforded limited weight given the local network coverage, and the fact the proposal involves the removal of payphones that would otherwise remain available for use by those without access to a mobile phone. It is acknowledged that the payphones are weathered and have a cost to their use, but the public benefit of the free UK calls alternative is limited.

The provision of advertisement within the High Street is an economic/social benefit, but local businesses along the High Street already benefit from their own advertisements, so business advertisements would likely be for those out of centre/non-local. The submitted statements identify a 5% advertisement time dedicated to the Council for local events/updates or tourist information. There are signs within the High Street that convey basic information about the location and directions, and it is unclear whether there would be a cost incurred by the Council for occupying this 5% advertisement time. These benefits are afforded limited weight.

CONCLUSION

The proposal would result in harm to the character and appearance of the High Street in conflict with ALP policy D DM1. There are material public benefits of the proposal, however, they do not overcome the harms identified and the proposals should be determined in accordance with the up-to-date development plan.

HUMAN RIGHTS ACT

The Council in making a decision, should be aware of and take into account any implications that may

arise from the Human Rights Act 1998. Under the Act, it is unlawful for a public authority such as Arun District Council to act in a manner, which is incompatible with the European Convention on Human Rights.

Consideration has been specifically given to Article 8 (Right to respect private and family life), Article 1 of the First Protocol (protection of property). It is not considered that the recommendation for refusal of permission in this case interferes with applicant's right to respect for their private and family life and their home, except insofar as it is necessary to protect the rights and freedoms of others (in this case, the rights of neighbours). The Council is also permitted to control the use of property in accordance with the general interest and the recommendation for refusal is considered to be a proportionate response to the submitted application based on the considerations set out in this report.

DUTY UNDER THE EQUALITIES ACT 2010

Duty under the Equalities Act 2010

In assessing this proposal the following impacts have been identified upon those people with the following protected characteristics (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation).

The proposal would have a neutral impact on the protected characteristics.

CIL DETAILS

This application is not CIL liable.

RECOMMENDATION

REFUSE

- 1 By virtue of its scale, siting, and that they are illuminated, the advertisements would represent a prominent and incongruous form of advertisement that detracts from, and harms, the established character and appearance of the street scene, and is therefore, contrary to Arun Local Plan policy D DM1.
- 2 **INFORMATIVE:** Statement pursuant to Article 35 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended). The Local Planning Authority has acted positively and proactively in determining this application by identifying matters of concern with the proposal and determining the application within a timely manner, clearly setting out the reason(s) for refusal, allowing the Applicant the opportunity to consider the harm caused and whether or not it can be remedied by a revision to the proposal. The Local Planning Authority is willing to provide pre-application advice in respect of any future application for a revised development.