

Development Management – Delegated Officer Report

Application Number: AWDM/0761/25

Recommendation: REFUSE

Site: Unit 1 Red Square Retail Park 194 Sompting Road Worthing

Proposal: Advertisement Consent for freestanding internally illuminated digital billboard

Date of Site Visit: 19/02/2026

Neighbours Checked: Y

Additional Neighbours Notified: N

Site and Surroundings

The site is located on the northern side of the A27 at its junction with Sompting Road. In this location the northern side of the A27 is predominantly commercial. To the north is ScS retail unit which forms part of Red Square Retail Park. To the north-east are Lyons Farm Retail Park and Downlands Retail Park with South Downs National Park beyond. Immediately to the east is a landscaped verge adjacent to the Wren Kitchens unit. To the west is a former pub now occupied by Toby Carvery.

On the southern side of the street the character is more mixed. There is a commercial parade to the south-west and a residential terrace to the immediate south, 1-6 Downlands Gardens. These are at least 28 metres from the site.

The site is not in proximity to any statutory listed buildings or local interest buildings and is not within a conservation area.

Proposal

The application proposes a free standing digital billboard on the land between the retail unit and the A27. The digital screen would be 6m by 3m and located on a base 2.5m tall.

The screen would be single sided and predominantly visible to motorists and pedestrians moving east along the A27. It would also be visible for people travelling northwards along Sompting Road.

The poster will be statically illuminated, and the illumination will be controlled by sensors that gauge the ambient conditions. The advertisement would change every 10 seconds and transition instantly without any special effects.

Relevant Planning History:

AWDM/0630/24 - Application for Consent to Display an Advertisement for 4No Internally illuminated LED signs

STATUS: Application Permitted 25th June 2024

Consultations

National Highways

25 July 2025:

We are concerned about the safety, reliability, and operational efficiency of the Strategic Road Network (SRN), in this case the A27 in the vicinity of the site.

In terms of advertisements, our focus is on the impact of the proposal on the safety of the users of the SRN. This is made very clear in the Department for Transport Circular 01/2022 (Strategic road network and the delivery of sustainable development) at para.61, which states (our emphasis):

61. The company will not object to proposals for advertising consent for displays outside of the highway boundary of the SRN unless it has specific reason to consider that a road safety hazard resulting from driver distraction would be a direct consequence of the advertisement. The company will particularly consider whether distraction is heightened owing to factors such as size, luminance and the accumulation of advertisements. These factors could present a safety concern for advertisements that are located where particular attention should be given to the driving task, or where the advertisement incorporates elements of traffic sign design, such as directional arrows.

This policy position also features in the National Planning Policy Framework (NPPF) (December 2024) at para.141.

We would also refer you to the Planning Practice Guidance (PPG) on advertisements, which highlights the risks associated with illuminated signs: *(PPG text quoted)*

The PPG also highlights the types of advertisement which may cause danger to road users: *(PPG quoted)*

We understand that the applicant is seeking advertisement consent for a freestanding internally illuminated digital billboard.

We have reviewed the submitted details in the context of national policy and practice guidance. We are mindful of the proximity of the sign to the SRN (A27) and the lightcontrolled junction.

At present, insufficient information has been submitted for us to assess the impact of the proposal on the safety of the users of the SRN. We require the applicant to submit the following information to the council for consultation with National Highways as the highway authority for the A27:

- Technical approval certification in accordance with the Design Manual for Roads and Bridges (DMRB) document CG 300. This is necessary to demonstrate that the proposed structure has been designed to appropriate standards by a qualified designer.
- Safety Risk Assessment (SRA) in accordance with DMRB document GG 104. There are reasonably foreseeable safety risks associated with the provision of the sign

specified and therefore we require a completed GG 104 safety risk assessment to assure that these risks are being managed suitably and sufficiently for the continued safe operation of the A27 at this location. Further guidance on SRAs is available from our website: <https://nationalhighways.co.uk/suppliers/health-safety-andwellbeing/home-safe-and-well/requirements-for-safety-risk-assessment/>. We have attached a template report that could be used to prepare the SRA.

- STATS 19 Collision Analysis for the most recent five-year period. This is required to understand the extent to which collisions have occurred at this location.

Given the size and proximity of the proposed advertisement sign to the A27, we would expect the applicant to follow the 'Managing Geotechnical Risk' process set out in the DMRB document CD 622. This is a matter that could be dealt with through an appropriately worded pre-construction condition, subject to the outcome of our review of the additional information requested above.

22 October 2025:

Since our holding recommendation of 25 July 2025, we have reviewed additional information submitted in support of the above referenced advertisement consent application.

This has included Collision Data & Analysis (29 August 2025), and a Safety Risk Assessment (SRA) (5 September 2025).

We provided our comments on this additional information in an email dated Friday 17 October 2025. Further work is required on the SRA to ensure it is compliant with the Design Manual for Roads and Bridges (DMRB) GG 104 document (please see our email of 17/10 for details).

We are mindful that the applicant has not responded to our requirement for a technical approval certificate from a qualified designer to demonstrate that the proposed structure has been designed to, and will be built in accordance with, appropriate standards. Relevant templates are set out in the appendices of DMRB document CG 300: <https://www.standardsforhighways.co.uk/search/042f72af-d5e7-4b60-8229-eaeb7e36ab91>.

This additional information is required to determine the impact of the advertisement on the safety of users of the SRN, in this case the users of the A27.

13 Nov 2025 to applicant:

We are concerned about the safety, reliability, and operational efficiency of the Strategic Road Network (SRN), in this case the A27.

We need a Cat 0 certificate to confirm that the advertisement sign is structurally safe, doesn't pose any risk to the public, and has been designed to the appropriate standards ([DMRB CD354](#)).

The certificate template ([DMRB CG300](#), Appendix J) can be followed. It should be signed by engineers with suitable qualifications.

We also require the Safety Risk Assessment to be amended to comply with the requirements of [DMRB GG104](#).

22 Jan 2026:

Since our holding recommendation of 22 October 2025, we have noted that no additional information addressing the outstanding Strategic Road Network (SRN – A27) matters has been submitted and uploaded to the planning application webpage.

The outstanding SRN matters are:

Safety Risk Assessment (SRA)

The SRA needs attention to ensure compliance with the Design Manual for Roads and Bridges (DMRB) document GG 104.

For the benefit of the applicant, we have attached our previously submitted comments which outline the additional work that is required.

Technical approval of the structure

The applicant has not responded to our requirement for a technical approval certificate from a qualified designer to demonstrate that the proposed structure has been designed to, and will be built in accordance with, appropriate standards. Relevant templates are set out in the appendices of DMRB document CG 300: <https://www.standardsforhighways.co.uk/search/042f72af-d5e7-4b60-8229-eaeb7e36ab91>.

This additional information is required to determine the impact of the advertisement on the safety of users of the SRN, in this case the users of the A27.

31 March 2026:

Technical approval of the structure

The additional information comprises a CG 300 signed certificate in respect of the proposed structure.

We have reviewed the submitted information in the context of our holding response to this application dated 22 January 2026.

We can confirm that the applicant has used the correct template, as set out in the Design Manual for Roads and Bridges (DMRB) CG 300 document (Appendix J).

However, insufficient information has been submitted. We require the following:

- The designer should clearly confirm which standards have been used, particularly in relation to the connections between the new frames and the existing low-level brick wall. They should verify that the existing walls are capable of supporting the loads imposed by the new frames.

- Relevant General Arrangement (GA) drawings must be attached.
- The certificate must be signed by Design and Check Team Leader, not just Design Team Leader (in this case one person can sign as a Design and Check Team Leader).
- All the signatures must be certified Adobe digital signatures. Scanned or photocopied signatures are not acceptable.
- Please note that the requirement under Note 5) shall be followed. The signatory should be a Principal of the organisation responsible for the design and checking.

This additional information is required to demonstrate the structural integrity of the proposed structure which is relevant to our assessment of the proposal on the safety of the Strategic Road Network (SRN), in this case the A27.

Safety Risk Assessment (SRA)

In addition, we are mindful that we have not been consulted on an updated SRA addressing the points raised in our previous responses (replicated below).

The SRA needs attention to ensure compliance with the Design Manual for Roads and Bridges (DMRB) document GG 104.

7 May 2026:

The applicant's consultant (copied in) has shared this additional information with National Highways in a separate email which we have responded to.

Technical approval of the structure

We have reviewed the submitted Cat 0 certificate in the context of our earlier comments and the requirements of the Design Manual for Roads and Bridges (DMRB) CG 300 document.

Additional information is required which we have requested from the applicant's consultant. We have attached a copy of the certificate with our annotated comments.

Safety Risk Assessment (SRA)

In addition, we are mindful that we have not been consulted on an updated SRA addressing the points raised in our previous responses (replicated below).

The SRA needs attention to ensure compliance with the Design Manual for Roads and Bridges (DMRB) document GG 104.

For the benefit of the applicant, we have attached our previously submitted comments which outline the additional work that is required.

7 May 2026:

Technical approval of the structure

We have reviewed the submitted Cat 0 certificate in the context of our earlier comments and the requirements of the Design Manual for Roads and Bridges (DMRB) CG 300 document.

Additional information is required which we have requested from the applicant's consultant. We have attached a copy of the certificate with our annotated comments.

Safety Risk Assessment (SRA)

In addition, we are mindful that we have not been consulted on an updated SRA addressing the points raised in our previous responses (replicated below).

The SRA needs attention to ensure compliance with the Design Manual for Roads and Bridges (DMRB) document GG 104.

For the benefit of the applicant, we have attached our previously submitted comments which outline the additional work that is required.

1 June 2026:

Safety Risk Assessment (SRA)

The applicant shared with National Highways the updated SRA (Rev. 02, 14 January 2026 – please see attached) on 07 May 2026.

We reviewed the updated SRA in the context of our earlier comments and the requirements of the Design Manual for Roads and Bridges (DMRB) GG 104 document.

We are content that the SRA is suitable and sufficient in assuring that safety risk is managed so far as is reasonably possible in support of this planning application. This matter has been resolved.

Technical approval of the structure

On the 28 May 2026, the applicant shared a design pack for the advertisement structure.

We are reviewing the design pack against our previous comments on this matter and the requirements of the DMRB CG 300 document. This is work in progress.

1 July 2026: Since our holding recommendation of 01 June 2026 we have not received the additional information we requested in respect of the proposed structure, as required by the Design Manual for Roads and Bridges (DMRB) CG 300 document.

The design pack that was shared with National Highways on 28 May 2026 does not address the matter we have raised.

Our focus is on the structural integrity of the free-standing advertisement and how this meets the requirements of the Design Manual for Roads and Bridges (DMRB) CG 300 document.

This is required to demonstrate that the structure would not present an unacceptable safety risk to the users of the Strategic Road Network (SRN), in this case the A27.

To demonstrate compliance with the relevant standards, we need the applicant to complete the Cat 0 certificate as set out in DMRB CG 300.

We have shared constructive comments and advice with the applicant on initial drafts of the Cat 0 certificate.

We anticipate this can be resolved in a relatively short period of time. This remains the only outstanding SRN-related matter.

We are content that the submitted Safety Risk Assessment (SRA) (Rev. 02, 14 January 2026) is suitable and sufficient in assuring that safety risk is managed so far as is reasonably possible in support of this planning application. This matter has been resolved.

Neighbour Representations

None

Relevant Planning Policies:

Worthing Local Plan policies (WBC 2023): SP1, DM5, DM6,
National Planning Policy Framework (MHCLG 2024)
National Planning Practice Guidance

Planning Assessment:

The Town and Country Planning (Control of Advertisements) Regulations 2007 state that a local planning authority shall exercise its powers in the interests of amenity and public safety.

The NPPF states (in paragraph 141) that: The quality and character of places can suffer when advertisements are poorly sited and designed. A separate consent process within the planning system controls the display of advertisements, which should be operated in a way which is simple, efficient and effective. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.

Policy DM6 (Public Realm) states that “express consent will only be granted for advertisements which respect the character and appearance of the surrounding area, and do not create a danger or hazard to public safety”. The display of advertisements is acceptable in principle subject to the key considerations of the effects on amenity and public safety.

Amenity

The application proposes a digital screen of about 18 square metres. It would be located adjacent to the ScS unit on a landscaped buffer zone between the retail unit and the A27. There are examples of other advertisements in the area most notably the

ScS signage on the southern and western elevations and the signs at Toby Carvery to the west. These signs advertise their respective businesses and are either set on the buildings themselves or free standing of a modest scale and externally illuminated.

The proposed advertisement would be used to advertise businesses and products which are not connected to the adjacent retail park. The billboard would be highly visible in views from the west and also partly from the south. It would be large and represent an unduly prominent and discordant form of development. While the area is commercial in nature there are no adverts of this type and design in the vicinity. When viewed in the context of the ScS signs would have an unacceptable cumulative impact.

It is recognised that the site forms part of a landscaped buffer that transitions from the National Park in the east to the more commercial aspects of the street. The SCS retail unit and retail parks to the east are deliberately set back from the street behind landscaped buffer zones to minimise the impact of built form.

The planning statement refers to the programme to digitalise advertisements which they advise has overall resulted in fewer advertisements. However, in this location the digital billboard does not seek to replace any existing billboards and would instead erect an advertisement in a location in which these types of advertisements do not exist. The justification in the planning statement for the billboard reducing advertisements overall is therefore not considered relevant to this application.

In terms of residential amenity, as noted there is a terrace of six dwellings to the south of the site. Although it is noted that these are 28 metres from the site, it is considered that the residents would be affected. In response to the application for the south facing ScS sign, the illumination was conditioned to be turned off at 10pm due to the impact of the illumination on residents facing the site. While it is recognised that the proposed signage would be on an angle, the proposed illumination with hours throughout the night, would have a detrimental impact on these residents.

It is considered that the size, design and illumination of the proposed billboard would result in an unduly prominent appearance which would be detrimental to the visual amenity of the streetscene.

Public safety

The advertisement would be located adjacent to the A27. National Highways was consulted as the highway authority for the A27. National Highways has requested additional information to determine whether the sign would have an impact on public safety. The applicant has provided additional documents.

As noted above the Safety Risk Assessment as provided in January is considered suitable and sufficient in assuring that safety risk is managed so far as is reasonably possible. Outstanding matters related to construction remain but the applicant has asked that these could be dealt with by way of condition.

National Highways in their last comments noted that their focus “is on the structural integrity of the free-standing advertisement and how this meets the requirements of the Design Manual for Roads and Bridges (DMRB) CG 300 document. This is required

to demonstrate that the structure would not present an unacceptable safety risk to the users of the Strategic Road Network (SRN), in this case the A27. To demonstrate compliance with the relevant standards, we need the applicant to complete the Cat 0 certificate as set out in DMRB CG 300”

As this has not yet been provided it is not possible to determine that the advertisement would not affect public safety and is therefore also recommended for refusal on this basis.

Recommendation:

REFUSE for the reason:

1. The proposed digital LED billboard sign, which would display multiple static advertisements on rotation would, by reason of its size, design, positioning, location, and illumination, represent an unduly prominent and discordant form of advertisement out of keeping with the character and appearance of the streetscene and would result in adverse cumulative impacts when viewed in combination with existing signage. As such the proposal is contrary to policies DM5 and DM6 of the Worthing Local Plan and the relevant paragraphs of the National Planning Policy Framework.
2. Insufficient information has been provided to determine whether the application would have an unacceptable impact on the safety, reliability and/or operational efficiency of the strategic road network contrary to policy DM15 of the Worthing Local Plan and chapter 9 of the NPPF.

Informative

The Local Planning Authority has acted positively and proactively in determining this application by assessing the proposal against all material considerations, including planning policies and any representations that may have been received and subsequently determining to grant planning permission in accordance with the presumption in favour of sustainable development, as set out within the National Planning Policy Framework.

Is recommendation contrary to letter(s) of representation? N

Case Officer: Louise Prew

Date: 16/07/2026

Authorised by: Peter Barnett

Date: 16 July 2026