

David Lees Architects

26th July 2022

By email only
Alison Webster
Senior Planner
Planning & Regeneration Services
Gravesham Borough Council

67 Stonebridge Road, Northfleet, Gravesend, Kent DA11 9BA
Application Reference 20220163
Application for consent to erect digital display advertisement of 3 metres x 6 metres hoarding.

Dear Alison

Many thanks for your continued patience whilst we have been considering the best way to progress with this application.

In our discussions to date, you have relayed to us concerns raised by your colleagues with regard to the illuminance of the proposed advertisement hoarding. Our original application proposed a hoarding attached to the side of the property onto which printed advertisement posters or banners could be fixed and illuminated by a series of lights fixed above the banner.

Whilst researching this subject in an attempt to demonstrate the light levels created by the illuminated advertising hoarding, it became apparent that there is a move within the industry away from the 'paste up' type advertisements and instead a move towards digital formats which can be operated from a central location, improving the flexibility of the display without the need to access the site in person to post a

new advertisement. We note that this approach is being used elsewhere close to this site.

This new format of digital display boards offer many benefits- In addition to being easier to use, the boards are easily erected, low maintenance and during their lifespan consume significantly less resources.

The proposal

The proposal seeks to erect a digital advertisement display on the side gable of the subject property. It is proposed that this display will only show static advertisements, sequentially, but not moving images. The nature of the device is discussed later.

As has been demonstrated elsewhere in the Borough and beyond, this type of advertisement display brings a number of advantages:

Firstly, this form of display has aesthetic benefits- paper post-up hoardings soon look tired, with loose paper tearing, fading or being defaced, having a detrimental impact on the appearance of an area.

This form of display requires fewer vehicle trips for reposting adverts with only 2 technical inspections annually, rather than weekly or bi-weekly visits to post new advertisements.

Digital advertising creates significantly less waste than printed equivalents.

Digital advertising has the ability to broadcast emergency messaging (e.g. Government and public health messaging) and can be adapted to integrate with Smart City infrastructure, delivering traffic messages etc.

Digital advertisements can display a range of advertisements including non-commercial displays during any down-time.

Digital displays create the opportunity for more locally relevant advertising- perhaps responding to uses in the neighbouring industrial estate.

Content will be controlled remotely in real time from a centralized operation centre enabling the display to be monitored constantly and repairs or maintenance to be planned. Diagnostics software will report and resolve the majority of issues remotely.

The display can be intelligently and remotely controlled to limit the illuminance such that it is limited to 300cd/m² at night time (on a full white display) in accordance with the Institute of Lighting Professionals best practice guidance 'The Brightness of Illuminated Advertisements PLG05 2015'. Please note that the guidance distinguishes between daytime and night time illuminance, with a limit of 5,000cd/m² applied during the daytime. The illuminance will be monitored by the controls built into the display. Whilst the ILP guidelines will represent the upper limit, the actual level of illuminance in all likelihood will be well below this.

From research we understand that the following conditions have become established as best practice for roadside digital displays and will be applied to control the operation of the digital poster in the interests of amenity and public safety:

- Static images to be displayed only (no moving or flashing images);
- Changes between adverts to take place instantly with no sequencing, fading, swiping or merging of images;
- Maximum level of night time illuminance to be set to 300cd/m² in accordance with ILP Guidelines;
- Advertisements to change no more frequently than once every ten seconds.

Where circumstances demand, additional controls or variations of these conditions may be acceptable to the applicant. However, it would be expected that the Local Planning Authority present evidence based justification for deviating from the standard approach as any planning conditions imposed must meet the six tests as set out in National Planning Policy Guidance (NPPG).

The site

The proposal site, the side gable of 67 Stonebridge Road, is located on the junction of Stonebridge Road with Lower Road and as such the location acts as a gateway into the Oakwood Industrial Estate located around Lower Road. There is an opportunity for this advertisement display to work with the activities of the industrial estate, in addition to other advertising.

Traveling north along Stonebridge Road towards the proposed display site is located where the road bends to the west, becoming Galley Hill Road. Immediately to the south of the proposed site is a large yard used by a scaffolding company and further south is the 'Kufflink Stadium, used by Ebbsfleet United Football Club.

The junction of Railway Street and Stonebridge Road and supports one digital billboard, which is visible from the Stonebridge Road roundabout, we understand this was recently granted planning consent and upgraded from a 'post-up' format advertisement.

The site surroundings are predominantly urban in character, surrounded predominantly by commercial uses, including car sales, the Gordon Grill restaurant, a car wash and other commercial uses.

There are pockets of housing further south on Stonebridge Road, further west on Galley Hill Road and the subject site itself is a short terrace of houses leading into Lower Road.

It is not expected that the site would impact on the Crossrail or HS2 safeguarding zones, nor any heritage assets. The site is distant from the Bakers Hole Site of Special Scientific Interest, so will have no harmful impact.

Given the location, the applicant proposes that the proposed location for the display will cause no harm or detriment to the local area and will not impact on local dwellings or their residents.

Planning policy

The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (the "Regulations") provides the legislative background for policies controlling advertising. Regulation 3 describes that advertising should be controlled in the interest of amenity and public safety.

The National Planning Policy Framework 2019 (NPPF) sets out the government's planning policies for England and how these are expected to be applied. Paragraph 132 of the NPPF states advertisements should be subject to control only in the interests of amenity and public safety. The NPPG recommends local plans should contain advertisement policies if such policies are considered necessary to protect the unique character of a particular area.

At a local level, the old Local Plan Policy TC8 relates to advertisements. The policy states that applications for advertisements which are detrimental to public safety or amenity will be resisted.

Proposed Development Management Policy DM 38 (Advertisements), states that: "Any proposal for an advertisement will need to comply with the following criteria:

- a) It is of a high-quality design and sensitive to the visual appearance of the building on which it is to be sited and the surrounding street scene, especially when it is to be displayed on a listed building or in a conservation area;
- b) It is appropriate to its setting and location and has due regard to local distinctiveness;
- c) It does not contribute to an unsightly proliferation or clutter of signage in the vicinity;
- d) It does not cause a hazard to pedestrians or road users;
- e) It does not cause visual intrusion by virtue of light pollution into adjoining properties or poorly directed light pollution elsewhere;
- f) If it is appropriate and relevant to the business or premises on which it is to be displayed.

The proposed advertisement display responds positively to all of these points- The display will be a modern, efficient and attractive alternative to the post-up type advertisements often seen. The area is a heavily used by vehicular traffic and has a fragmented appearance with many different uses and building typologies- the proposed advertisement will not be to the detriment of the setting, nor harm its distinctiveness. The neat modern appearance of this advertisement will not add clutter to the area, and will cause no hazards to local pedestrian or road users. The light produced by the sign will not impact on the adjoining residential properties at all, facing away from any sensitive elevations.

Planning considerations

It is acknowledged by the applicant that the proposed advertisement display will require planning consent and the proposals will be assessed by their impact on amenity and public safety.

Amenity

The progressive digitization of the advertising network will enable sites to display a wide range of adverts efficiently with infrastructure which has a lower impact on the surrounding area. Digital advertisements are easier to maintain than their paper equivalents.

The controls proposed over the level of luminance at night are in line with the ILP Guidelines and industry best practice and will ensure that the proposed display does not cause any material harm to amenity. Within the local context there is a precedence for illuminated signage establishing the site as appropriate for an illuminated advert of this type. The applicant is willing consider additional controls over the display will if necessary to respond to specific concerns, and the digital technology used in such signage offers this level of flexibility to adapt to local constraints..

The proposal is not within a conservation or does it affect any listed buildings, or local heritage assets.

The character and setting of the site, street scene, and surrounding area is predominantly commercial, we understand that national guidance and advice suggests locating advertisements in this type of location where impacts have a lower impact on the surroundings.

The location is a comparatively small property, seen in the context of the large car sales yard, industrial sheds and Ebbsfleet United Football Club. Given the commercial and industrial nature of the site and surrounding area, the proposed signage would have a low impact on the area and would not add to visual clutter, sitting comfortably in its context without harming amenity, the qualities of the site, or the character and appearance of the wider area.

Public Safety

When assessing public safety, the key considerations are whether the location is appropriate (i.e. undemanding on the driver) and whether the level of illumination and the change between advertisements prevents distractions to the driver.

The location of the signage would not impact on any visibility splays as drivers transition between roads surrounding the site. Stonebridge Road has a 40mph speed limit the junction close to the proposed

display is controlled by traffic lights, reducing the risks of distraction to any drivers arriving at this location. Drivers would be able to look briefly at the display without being distracted from the road, road users and pedestrians.

Vehicles leaving Lower Road, joining Stonebridge Road would not be distracted the sign, which is effectively behind the vehicles as they leave the road.

As such it is considered that the proposed display location would not create a distraction or hazard for any road user, vehicular, cycle or pedestrian.

Attached to this letter are the following items which we trust satisfy the requirements, and will enable the application to be validated, consulted upon and determined.

- 1) 1:1250 Ordnance Survey location plan showing the site in relation to the local area. This is a standard OS document, to scale, referencing the north point.
- 2) 1:500 Site / Block plan of the site (OS standard)
- 3) Scale elevation of the property prior to the installation of the advertisement
- 4) Scale elevation of the property following the installation of the advertisement.

We trust that this information meets your requirements and adequately illustrates the proposals. Should you require any further information, please get in touch via email or call on 07597 573 892.

Yours sincerely

David Lees RIBA

07597 573 892