

Gravesham Borough Council,
Planning Department,
Civic Centre,
Gravesend,
DA12 1AU

23 October 2024

Dear Sir / Madam

A2 TRUNK ROAD, GRAVESEND, DA12 3BH

ERECTION OF A D6 SMALL FORMAT ADVERTISEMENT DISPLAY

This cover letter has been prepared on behalf of Wildstone Estates Limited, an outdoor media infrastructure provider, and is submitted in support of an application for advertisement consent to erect a wall mounted D6 small format advertisement display at the above site.

The site comprises a Petrol Filling Station (PFS) owned by Motor Fuel Group (MFG), the largest independent forecourt operator in the UK. The Company currently has around 1,200 sites which offer customers a growing dual-fuel strategy, a versatile valeting offer and a convenient retail and 'food to go' portfolio.

Wildstone Estates Limited is working in partnership with MFG to modernise existing advertising infrastructure across the MFG portfolio and where possible to rationalise and declutter existing advertisements, which aligns with an industry wide programme.

The Proposal

The proposal seeks to erect a wall mounted D6 small format advertising display which will exhibit static advertisements on rotation. This is a standard small format advertisement, which is found across the UK in roadside, retail and transportation environments. There are over 75,000 6-sheets in the UK. The advertisement which is the subject of this application is primarily aimed at users of the PFS rather than road users.

The proposed D6 small format advertisement display has the same dimensions as a standard 6-sheet hoarding, measuring 1.23m(w) x 2.16m(h) x 0.22m(d). The proposed advertisement will utilise LCD digital technology, which is durable, efficient and can be easily erected with minimal engineering. The quality of the image produced will mimic that of a traditional paper and paste display (**Appendix 1**). The proposed display will meet modern requirements and will be capable of displaying 6 advertising campaigns at a time, sequencing every ten seconds. The advertisements will comprise local and national campaigns as well as goods and services sold on site.

The D6 small format advertisement display will be monitored and controlled remotely in real time from a Network Operation Centre (NOC) to display advertisements and facilitate responsive maintenance where necessary. Diagnostics software can report any small technical faults (e.g. a broken panel) so that a kill switch

can turn the content to black. Engineers are able to respond within 24 hours to any issues which require attendance.

Conditions

All advertisements are subject to the five standard conditions set out in the Regulations. The vast majority of digital advertisement consents now also operate within an established set of parameters that include controls over the level of luminance and the proposed speed and rate of change between adverts. These “industry standard” conditions have evolved over time, in order to address common concerns relating to amenity and public safety.

The proposed display will operate with a system of threshold controls, timers and light sensors to ensure that the luminance never exceeds the ILP guideline figure at night time, with lower thresholds set on more sensitive sites

Newly published guidelines by the Institute of Lighting Professionals (ILP) have introduced a new set of model conditions which can be applied to advertisement consents going forwards. The model conditions are set out within Appendix 1 of Technical Note 5 “The Brightness of Illuminated Advertisements including Digital Displays” (PLG05/23) and are included within **Appendix 3** this statement for clarity.

The Site

The proposal site is located within the wholly commercial entity of the PFS and the D6 small format advertisement display will be positioned within the site boundary. The site surroundings are predominantly industrial in character.

The advert will be viewed predominately by users of the PFS therefore impact on surrounding area is negligible. There are numerous existing advertising displays and non-illuminated signs located within the PFS.

There are no residential dwellings in close proximity to the proposed display.

The site is not located within a conservation area and there are no listed buildings or heritage assets in proximity to the site.

The site is located within the Green Belt however it is not considered that the proposal would take away from the character or openness of the green belt due to scale in relation to the PFS and its existing commercialised and industrial location. Acceptability of advertisements within the PFS has been established due to the multiple examples seen within the site.

In accordance with the categorisations set out in the newly published ILP Guide PLG 05/23, the proposal would be classified as within Environmental Zone 3 (Suburban).

The site is in a location where advertising of this type would typically be found.



Figure 1 – Site street view (November 2022)

Planning Policy

The legislative framework for the control of advertisements is contained within The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (the “Regulations”). Regulation 3 states that advertising should be controlled in the interest of amenity and public safety, taking into account the provisions of the development plan, in so far as they are material, in addition to any other relevant factors.

The National Planning Policy Framework 2023 (NPPF) sets out the government's planning policies for England and how these are expected to be applied. In accordance with Paragraph 141 of the National Planning Policy Framework (NPPF) advertisements should be subject to control only in the interests of amenity and public safety, taking into account cumulative impacts. As described in the National Planning Practice Guidance (NPPG) the regime is a “lighter touch” than the system for obtaining planning permission for development. The NPPG also clarifies that a local plan does not have to contain advertisement policies and that if such policies are considered necessary to protect the unique character of a particular area, these should be evidence-based.

The statutory Development Plan for the area consists of the Gravesham Local Plan Core Strategy 2014 and Gravesham Local Plan First Review Saved Policies 1994. The Council's Advertising Policy is Saved Policy TC8 Advertisement Control which follows the same approach as the Advertisement regulations in granting consent provided advertisements have an acceptable impact upon amenity or public safety.

Planning Considerations

The proposed commercial location is considered to be appropriate in principle for a D6 small format advertisement display and in line with planning regulations, the impact of the proposal has been considered in amenity and public safety terms and are addressed in turn below:

Amenity

The site is located within a petrol filling station (PFS) and is a highly commercial site, situated on a busy road (the A2) which is considered to be an appropriate location in principle for digital advertising. The advertisement would be viewed within the context of the petrol station, and the scale of the large existing canopy. It would not appear out of place and will sit positively within the surrounding area and the existing character. The panel will be mounted on the existing retail unit therefore not impacting on any existing views.

The proposal being sought is of a temporary nature and the suitability of the site has been assessed on the basis of the current environment. The proposal would not be detrimental in either an immediate or wider sense and would be appropriately located. It is not within a Conservation Area, attached or adjacent to a listed building, or within proximity of any local heritage assets. The sites' location within an established PFS, and the

proposals scale in relation to the existing surroundings mean that it will not have any impacts upon the character or openness of the green belt.

The commercial and industrial context of the surroundings and nearby examples of similar adverts establishes the site as an appropriate location for an illuminated advert of this type.

The panel has been positioned to minimise any impacts on the surrounding area directly facing the petrol forecourt. There is existing advertising on the site which have been there for many years, establishing the acceptability of advertising within this location.

The site is located within a suburban area in which a brightness level of 300cd/sqm is considered acceptable during night time. There are no residential windows within proximity to the site. The nearest residential windows are approximately 530m away and the display will not be visible from these residential windows.

The proposed panel will upgrade and modernise the site in line with the long term aspirations to modernise the MFG PFS estate to meet customer requirements. It will add value to the wider regeneration and sit comfortably within the existing site and wider surrounding area.

Public Safety

The site is located within a highly commercial area, adjacent to a busy highway, where advertising of this type would typically be found. The panel has been positioned to ensure that no driver visibility is blocked for users of the PFS entering or leaving the site or those traveling along the A2. Those in direct view will either be within the PFS or travelling along the straight uncomplicated carriageway of the A2. The cognitive demand on road users at this point is low as there are no unusual highway complexities which would require extra care to be taken or decision points until well after the advertisement is visibility. As such, drivers would be entirely capable of glancing at advertisements whilst maintaining stopping distances and an awareness of surrounding traffic movements.

Although the signs will attract attention, as all signs are designed to do, it is not considered that the proposed display is so unusual or the road characteristics so complicated that an advertisement in this location would cause a public safety concern. The proposed panels would incorporate illumination levels which align with the ILP's Guidance and this intensity is considered wholly acceptable for the location.

The panel would be viewed within the context of its surroundings which is considered to be an acceptable location for advertising in highway terms.

Conclusion

The proposal seeks to erect a D6 small format digital advertising panel at the site which is considered to be an appropriate location for advertising in principle and will contribute to the wider modernisation of the sites which sit within the MFG portfolio. The size and scale of the D6 small format advertisement display is de-minimis in the context of the PFS. PFS sites are an appropriate location in principle for this form of advertising and the positioning and operational controls have been carefully considered to ensure that the proposed 6-sheet digital advertising display fits in appropriately to the site and the wider surrounding area and will have a negligible impact on public safety.

The proposed conditions to control the operation of the advertisement including the luminance of the digital display will ensure that there is no adverse impact on visual or residential amenity or public safety.

For these reasons and the positive benefits set out, it is not considered that the proposal would have any detrimental impact on amenity or public safety and as such should be capable of being granted consent subject to appropriate conditions to control the operation of the advertisement.

Application Submission

In order to complete the application, please find attached the following documentation:

- Completed application forms
- Letter Statement (this letter);
- Architectural drawings including;
 - FS899/PA/01 Site Location Plan
 - FS899/PA/02 Existing Site Plan
 - FS899/PA/03 Proposed Site Plan
 - FS899/PA/04 Existing and Proposed Elevations
 - FS899/PA/05 Existing and Proposed CGIs

Additionally, we will arrange payment to the Council to cover the cost of the Advertisement Consent application.

I trust that the above is clear and we look forward to receiving notification that the application has been registered in due course. Should you have any queries in relation to any of the attached information, please do not hesitate to contact me.

Yours faithfully

