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UNITED KINGDOM

26th July 2024

Our Ref: 31871/A5/JK
Planning Portal Ref: PP-13282259

Gravesham Borough Council
Planning Department
Civic Centre
Gravesend
DA12 1AU

Dear Sir/Madam,

TOWN AND COUNTRY PLANNING (CONTROL OF ADVERTISEMENTS) (ENGLAND) REGULATIONS 2007
59 MILTON ROAD, GRAVESEND, DA12 2PJ
INSTALLATION OF DIGITAL ADVERTISEMENT DISPLAY

Please find enclosed an application for advertisement consent to install a modern digital format ("D-Poster") at the above Site. The Site has been selected due to its suitability for advertising and will help to establish a network of displays in the area. It will be capable of being operated from a central location and significantly reduce vehicle trips for reposting when compared with a traditional poster and paste billboard.

This is part of an industry wide drive to rationalise, modernise and update advertising infrastructure to meet modern requirements. In addition to converting some of the better located sites to digital, in many instances this will mean removing inappropriately located or poorly performing displays and developing new sites in better locations. The overall strategy is to reduce the numbers of displays to deliver premium sites in the best locations, capable of supporting multiple advertising campaigns and providing a piece of digital infrastructure adaptable to a wide range of uses.

THE APPLICANT

Wildstone Estates Limited ("the Applicant") is part of the Wildstone Group, an outdoor media infrastructure provider that owns and manages the land and equipment required for advertising. Their advertising assets are then rented to operators, who sell the advertising space to local and national companies for various advertising campaigns.

Outdoor Advertising is now widely recognised by lenders as a property class, allowing it to attract new investment and innovation. As an outdoor media infrastructure provider, Wildstone has invested in the development of hardware in the form of the "D-Poster" panel, which is a high-quality ultra-thin display that offers a high level of control over brightness and reduced energy consumption. The control mechanisms in place enable the D-Poster to mimic a traditional 48-sheet poster during the day and ensure that it is muted and at a suitable contrast to the ambient light at night time.

As landlords, Wildstone will always have a long-term investment in their sites regardless of who the tenant is and will manage their assets to ensure that the sites are well maintained and the displays are operating in line with planning conditions. Any problems arising from the sites can therefore be dealt with by a single controlling party.

As the largest owner of advertising assets in the Country and landlord to all the major operators, Wildstone are now also in a strong position to be able to push best practice. Through partnership with the media operators and screen maintenance and monitoring contractors, new systems of control have already been established to help manage the operation of the displays.

Content is controlled remotely in real time from a Network Operation Centre (NOC) and the sites are monitored remotely 24/7 to facilitate responsive maintenance. Engineers are located nationwide to be able to respond within 24 hours to any issues that cannot be dealt with remotely. Diagnostics software can report any small technical faults (e.g., a broken panel) so that a kill switch can turn the content to black until the engineer can reach the Site.

THE PROPOSAL

The proposal seeks to install an advertising display (a “D-Poster”) which will display multiple static advertisements on rotation. The proposal Site has not previously supported advertising but is well located in commercial and planning terms. The development of sites of this type will facilitate the removal of less well located sites elsewhere.

The proposal panel has the same dimensions as a standard 48-sheet hoarding, measuring 6m(w) x 3m(h) x 0.065m (d) and positioned 4.50m above ground. It will face the west bound traffic travelling along Milton Road (A226). The proposed display technology is lightweight, durable, efficient and can be easily erected with minimal engineering. In most instances the installation of a D-poster can be achieved at a similar speed to traditional posting, with minimal structural work. The quality of the image produced will mimic that of a traditional poster, as illustrated at **Appendix 1**.

The screen is able to adjust according to changes in the ambient light, ensuring that the brightness decreases in low light conditions. An example of the digital display operating in a different condition is included at **Appendix 2**. The proposed display will meet modern requirements and will be capable of displaying 6 advertising campaigns at a time, sequencing every ten seconds.

The proposal is submitted as part of a nation-wide project to upgrade traditional advertising hoardings to a modern digital format, which will see an overall reduction in adverts, as multiple advertising campaigns can be supported by single panels. This will result in the consolidation of “multi-panel” sites into single panels. As can be seen in Figure 1 below there has been an overall reduction in the volume of advertising panels over an extended period of time, even though the number of digital sites is increasing.

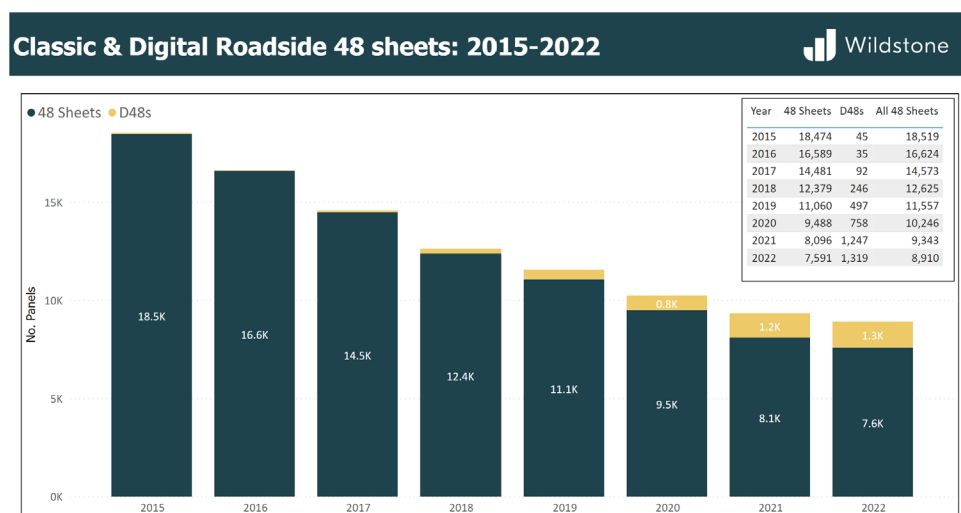


Figure 1: Reduction in 48-sheet advertising 2015-2022

At present, there are over 1,300 digital 48-sheet advertisements across the UK, which is up from just 45 in 2015. However, over the same period the number of poster and paste 48 sheets has more than halved, from 18,519 to 8,910. This is a total reduction of 8,335 panels Nationwide, demonstrating a clear pattern of rationalisation and decluttering associated with digital upgrades. Since this project began Wildstone has obtained consent for over 700 consents for digital advertisements across the UK.

As well as removing clutter, this consolidation has additional benefits, such as the reduction in vehicle trips to repost adverts every two weeks, as this can now be done remotely.

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.

Wildstone and the industry body “Outsmart” have been working to establish best practice for the control of displays both at night and during the day. The D-Poster displays 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. Example sites operating in accordance with ILP Guidance during different times of the day are included at **Appendix 2** for information.

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** of this statement for clarity.

THE SITE

The proposal Site is located on the gable end of a block of a terraced property at 59 Milton Road in Gravesend, see **Figure 2**. below.



Figure 2:

The Site is bound by soft landscaping and the gable end of the no. 60 Milton Road to the east, Milton Road and railway land to the south, and other residential properties to the west and north.

The Site's immediate surroundings are predominantly residential in character. Commercial uses are located further along Milton Road in a westerly direction. The Site does not have any recent applications for advertisement consent. That said, an advertisement display was present on the Site between 2008 and August 2017, as demonstrated in **Figure 3** below.



Figure 3: Extract from Google Maps UK

There are, however, existing business-related signage, bus-stop and pavement advertisements and other paper and internally illuminated hoardings (ref: 20210484) within the vicinity of the Site, the closest being at 75 metres to the east, further along Milton Road, as illustrated in **Figures 3 to 5** below.



Figure 3:

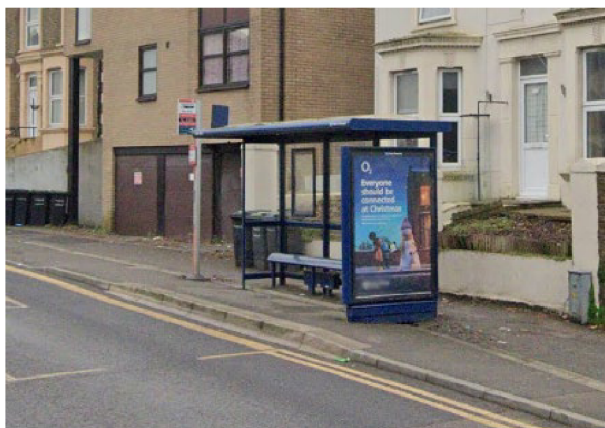


Figure 4:



Figure 5:

The Site itself is not subject to any statutory landscape or historic designations and is not located within a Conservation Area.

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 2024 (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 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 Development Plan documents for the area comprise the Gravesham Local Planning Core Strategy (2014) and the Saved Policies of the Gravesham Local Plan First Review (1994). Policies CS19, TC8 and the Council's SPG 3 set out the design principles that all development should adhere to achieve high quality design and ensuring adequate levels amenity and public safety is achieved.

PLANNING CONSIDERATIONS

The proposal will present a new location for advertising but forms part of a wider strategy of consolidation as illustrated in Figure 1. The proposed location has been selected due to its visibility and acceptability in planning terms. In accordance with the NPPF, applications for advertisement consent are subject to control in the interests of public safety and amenity only. Accordingly, the proposal is assessed as follows:

Amenity

The Site has been selected as an acceptable location for advertising in principle due to its context. Despite being located within a predominantly residential area, the proposed display will not be visible for any habitable room windows.

The display will be controlled in line with best practice guidance to ensure that there will be minimal impact on the visual amenity during the daytime. At night, night-time illumination settings will ensure that the level of illumination is appropriate to the local area and is equivalent to a traditional externally illuminated advert, with a more even light spread.

The context of the surroundings, including street lighting, bus stops, shops and other internally illuminated hoards along Milton Road establishes the Site as appropriate for an illuminated advert of this type.

The side-by-side comparison photograph on the D-Poster information sheet (**Appendix 1**) helps to illustrate the minimal difference between a traditional sheet advertisement and the proposed “D-poster” once appropriate controls are put in place, which ensures that a digital advertisement is not over illuminated. Depending on how the screen is illuminated it can be muted or appear more vibrant in locations where that might be more appropriate.

The display will be controlled in line with best practice guidance to ensure that there will be minimal impact on the visual amenity during the daytime. At night, the high-level position of the display and the night-time illumination settings will ensure that the level of illumination is appropriate to the local area and is equivalent to a traditional externally illuminated advert, with a more even light spread. In accordance with the categorisations set out in the newly published ILP Guide PLG 05/23, it is agreed that the Site falls within Environmental Zone 4 (EZ4) and so as such, the maximum night-time luminance of the display should be set at 300cd/m2.

The proposal would not be detrimental in either an immediate or wider sense. It is not within a conservation area, attached or adjacent to a listed building, or within proximity of any local heritage assets. The Site can therefore be considered wholly appropriate in principle for advertising of this type. However, if the Council consider that the Site's context justifies further controls, our client would be willing to discuss matters further.

Public safety

Digital advertising is now a common feature in town centres and adjacent to major roads across the Country and there remains no casual evidence that they cause traffic collisions. Nevertheless, it is an accepted fact that advertisements are intended to attract attention. As such, they are best located in situations where demands on a driver are low, and they do not conflict or confuse with other traffic signs or signals.

Over the past decade an industry standard set of conditions has been established to control their use and minimise the potential for driver distraction. The proposal will operate within these conditions, thereby limiting the potential for distraction.

The proposal Site is in an uncomplicated location which drivers should be able to navigate with ease. The road is a straight road and as such 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. Drivers would therefore be entirely capable of glancing at advertisements whilst maintaining stopping distances and an awareness of surrounding traffic movements.

BENEFITS OF DIGITAL ADVERTISING

The attractiveness of digital advertising to an infrastructure provider is that it allows the advertising network to be better managed, monitored and maintained. For operators the inherent flexibility allows smarter real time campaigns and better control over sales.

These factors manifest in wider public benefits as summarised below:

- High quality and robust designs;
- Tidy and well-maintained sites and biodiversity net gain where the site allows;
- Uplift in business rates to spend on public services;
- Removal of multiple advertising sites and panels and reduction in clutter;
- Reduction in waste involved in the poster production process;
- Greater flexibility to enable better access to advertising displays for local businesses;
- Platforms to broadcast emergency messaging;
- Ability to use void periods for public messaging and public art campaigns; and
- Opportunity to integrate additional hardware to meet Smart City objectives.

These are benefits to development that will not be achieved by maintaining the status quo.

CONCLUSION

The proposal will be located in a position where advertising of this type is commonplace. The advertising is in scale with the surrounding built development. Its high-level position and the proposed conditions to control the luminance of the screens and the operation of the digital screens will ensure that there is no adverse impact on amenity or road safety.

For these reasons and the positive benefits set out, it is considered that the application should be granted consent.

APPLICATION SUBMISSION

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

- Completed application forms;
- Letter Statement (this letter);

- Architectural drawings including;
 - 23533 | PA | 01 Site Location Plan
 - 23533 | PA | 02 Existing Site Plan
 - 23533 | PA | 03 Proposed Site Plan
 - 23533 | PA | 04 Existing and Proposed Elevations

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

We 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,



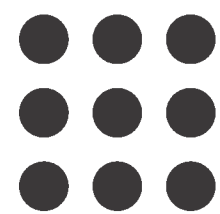
JUSTIN KENWORTHY

Planning Director

STANTEC UK LIMITED

APPENDIX 1 - D-POSTER INFORMATION SHEET

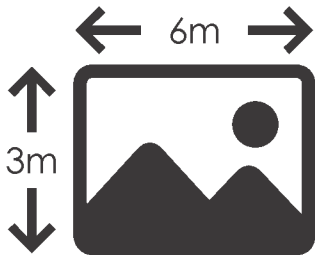
D-POSTER



High resolution LED display



Dimmable to 55 cd/m²
Embedded ambient light sensors to control brightness



Sized to match existing poster panels



Reduced depth of 60mm compared to traditional digital panel (300-600mm)

APPENDIX 2 - EXAMPLE SITES OPERATING IN ACCORDANCE WITH ILP GUIDANCE DURING DIFFERENT TIMES OF THE DAY.



Daytime Clear Skies



FREE RANGE

Libby Byrde
L.P. Masterpieces by the River
At Home, 2020
London College of Communication
WUOLAH.com
© L.P.



Supporting the graduates of 2020
in partnership with Clear Channel
National Network

libby byrde Clear Channel

Daytime Overcast



Every tin helps

Time to spill the beans. All our tins are plastic-wrap free.

TESCO Every little helps

DOWNHILLS PARK ROAD

Clear Channel

Belmont Controlled ZONE

Wood Green Outer Controlled ZONE

Twilight



Pitchford Steelstock
Tel: 01384 489030

Tomorrow
begins **Today.**

40

Dusk



Night

APPENDIX 3 - ILP MODEL CONDITIONS

Model Conditions

The following model conditions are as set out in Appendix 1 of the Institute of Lighting Professionals (ILP) Technical Note 5 “The Brightness of Illuminated Advertisements including Digital Displays” (PLG05/23).

The model conditions include the standard conditions set out in the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 [The Regulations].

The first condition relates to the standard time period of a consent, which unless otherwise specified should be five years, as set out on Part 3 of The Regulations. Please note, following the expiry of the time period an application would benefit from Deemed consent under Class 14 Schedule 3 of the Regulations. As set out in National Planning Practice Guidance (NPPG), conditions cannot be used to prevent the operation of Class 14 unless supported by specific and relevant planning considerations.

The second condition seeks to ensure that the application is implemented in accordance with the approved plans and application documents.

Conditions 3 to 7 represent the five “standard conditions” attached to all applications for advertisement consent, set out in Schedule 2 of the Regulations.

Conditions 7 to 13 are commonly applied to digital consents and have been standardised by ILP with reference to the updated guidance document.

These conditions can be adapted to suite the application proposal, with additional conditions added where they pass the standard tests set out in the National Planning Policy Framework (NPPF).

Time Period

1. The consent now granted is limited to a period of five years from the date hereof.

Reason: To accord with Schedule 2 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

Application Documents

2. The development shall be undertaken in strict accordance with the approved documents for this Advertisement Consent which comprise:

- Completed application forms;
- Letter Statement;
- Architectural drawings including;
 - 23533 | PA | 01 Site Location Plan
 - 23533 | PA | 02 Existing Site Plan
 - 23533 | PA | 03 Proposed Site Plan
 - 23533 | PA | 04 Existing and Proposed Elevations

Reason: To define the permission and for the avoidance of doubt and in the interest of

proper planning procedures.

Standard Conditions

3. Any advertisement displayed, and any site used for the display of advertisements, shall be maintained in a condition that does not impair the visual amenity of the site.

Reason: To accord with Schedule 2 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

4. Any structure or hoarding erected or used principally for the purpose of displaying advertisements shall be maintained in a condition that does not endanger the public.

Reason: To accord with Schedule 2 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

5. Where an advertisement is required under these Regulations to be removed, the site shall be left in a condition that does not endanger the public or impair visual amenity.

Reason: To accord with Schedule 2 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

6. No advertisement is to be displayed without the permission of the owner of the site or any other person with an interest in the site entitled to grant permission.

Reason: To accord with Schedule 2 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

7. No advertisement shall be sited or displayed so as to:

- a) Endanger persons using any highway, railway, waterway, dock, harbour or aerodrome (civil or military).
- b) Obscure, or hinder the ready interpretation of, any traffic sign, railway signal, or aid to navigation by water or air.
- c) Hinder the operation of any device used for the purpose of security, or surveillance, or for measuring the speed of any vehicle.

Reason: To accord with Schedule 2 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

Digital consents

8. There shall be no moving images, animation, video or full motion images displayed unless otherwise permitted by this consent.

Reason: In the interests of amenity and in order to retain effective planning control.

9. In the hours of darkness, the advertisement display luminance shall be no greater than 300cd/m² in accordance with the recommended maximum night time luminance value set out for Environmental Zone 4 in Table 10.4 within the Institution of Lighting

Professionals - Professional Lighting Guide (PLG 05) 'Brightness of Illuminated Advertisements including Digital Displays' (or its equivalent in a replacement guide) in cd/m2.

Reason: In the interests of amenity, public safety and in order to retain effective planning control.

10. In daylight hours, the advertisement display luminance shall be controlled in order to reflect ambient light conditions (to ensure it is neither too bright or too dull), and shall at all times be no greater than the recommended maximum daytime luminance values set out in Table 10.5 within the Institution of Lighting Professionals - Professional Lighting Guide (PLG 05) 'Brightness of Illuminated Advertisements including Digital Displays' (or its equivalent in a replacement guide) in cd/m2.

Reason: In the interests of amenity, public safety and in order to retain effective planning control.

11. Unless otherwise permitted, the minimum display time for each advertisement shall be 10 seconds and the advertisement shall not include any features which would result in interactive messages / advertisements being displayed.

Reason: In the interests of amenity, public safety and in order to retain effective planning control.

12. The interval between successive advertisements shall be no greater than 1 second and the complete display shall change without effect. The display to include a mechanism to default to a blank or black screen in the event of malfunction, or if the advertisement is not in use.

Reason: In the interests of amenity, public safety and in order to retain effective planning control.

13. No images displayed shall resemble official road traffic signs, traffic lights or traffic matrix signs.

Reason: In the interests of amenity and in order to retain effective planning control.

APPENDIX 4 – SITE SPECIFIC INFORMATION SHEET

Appendix 5**Application for Advertisement Consent: Proposal Factsheet**

URN: 23533

Site Name: 59 Milton Road, Gravesend, DA12 2PJ

Planning Portal Reference: PP-1328259

Advertising Type	Hoarding
Size (HxWxD)	3m x 6m x 0.065m
Max Daytime Illumination	Up to 5,000 cd/sqm
Max Nighttime Illumination	300cd/sqm
Notes	n/a