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23rd May 2022

Dear Sir/Madam,

TOWN AND COUNTRY PLANNING (CONTROL OF ADVERTISEMENTS) (ENGLAND) REGULATIONS 2007

29 THE HILL, NORTHFLEET, GRAVESEND, DA11 9EX: CONVERSION OF POSTER ADVERTISEMENT DISPLAY TO D-POSTER

We have been instructed by Wildstone Estates Limited to submit an application for advertisement consent to upgrade an established paper and paste advertising display to a modern digital format, capable of being operated from a central location and significantly reducing vehicle trips for reposting.

This is part of an industry wide drive to rationalise, modernise and upgrade 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 whilst increasing their quality.

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.

This specialist landlord-tenant dynamic is symbolic of the maturity of the outdoor advertising sector as it becomes a legitimate property class attracting new investment and innovation. As the largest owner of advertising assets in the Country and landlord to all of the major operators, Wildstone are in a strong position to be able to push best practice and to change the perception of digital out of home (DOOH) advertising.

It is imperative, as part of this process, that there is confidence that digital displays can be appropriately controlled, and that there is a responsible party ensuring that conditions agreed at planning stage are met. Wildstone perform this function as they have a long-term investment in the sites regardless of who the tenant is.

Through partnership with the media operators as tenants, their in-house specialists, and screen maintenance and monitoring contractors, new systems of control have been established to help manage the operation of

the displays. Content is controlled remotely in real time from a Networks Operation Centre (NOC) and the sites are monitored remotely 24/7 to facilitate responsive maintenance. Diagnostics software reports any faults back to the NOC and a kill switch turns the content to black until it can be resolved.

Wildstone has also invested in hardware through the development of the “D-Poster” which offers a high level of control over brightness, enabling it to mimic a traditional 48 sheet poster during the day and in the evening to ensure that it is muted and appropriately lit.

The Proposal

The proposal seeks to “repost” the existing display at 29 The Hill, Northfleet, Gravesend, DA11 9EX with a “D-poster” which will display multiple static advertisements on rotation, as well as replacing the hoarding on which the display sits.

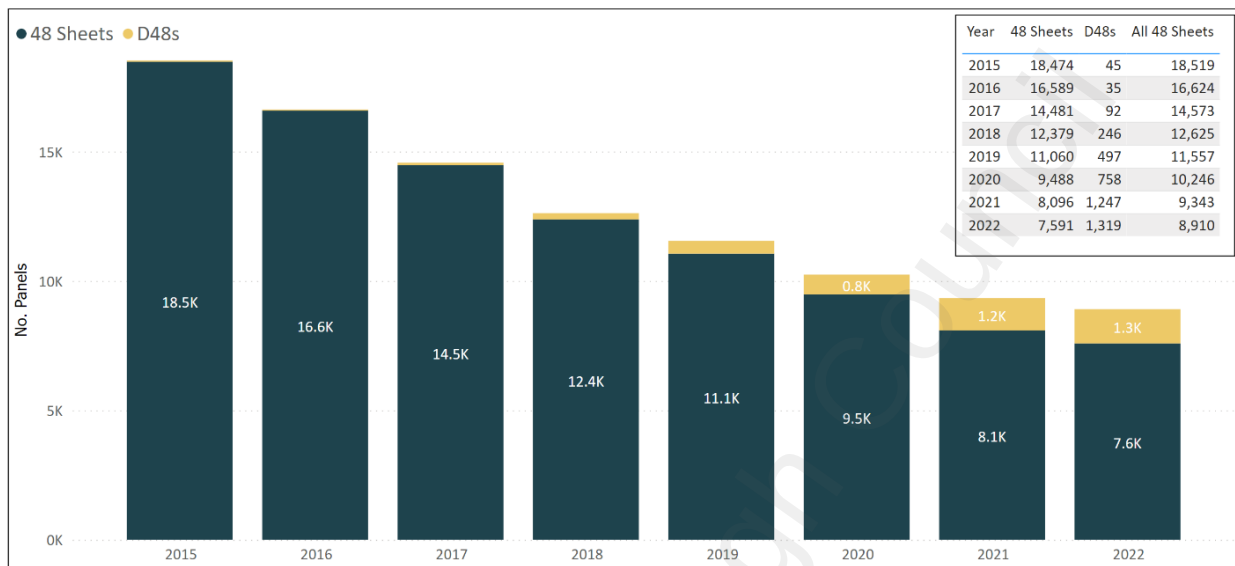
The proposed panel has the same dimensions as a standard 48-sheet hoarding, measuring 6m(w) x 3m(h) x 0.1m(d) and positioned 1.7m above ground. The proposed new display technology is lightweight, durable, efficient and can be easily erected with minimal engineering. In most instances the re-posting of 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**. An example of a digital display operating in a similar environment 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. It should be noted that this will see an overall reduction in adverts as multiple advertising campaigns can be supported by single panels. This will see the end of sites comprising a number of competing adverts all displaying different campaigns.

The statistics back this up (see Figure 1). At present, there are 1,319 digital 48-sheet advertisements in 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 over 700 consents have been granted for digital advertisements across the UK.

Classic & Digital Roadside 48 sheets: 2015-2022



Source: SPACE / Wobblytics (2022 to Q1)

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Figure 1 – Reduction in 48 sheet advertising 2015-2022

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.

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:

- Tidy up poorly maintained sites and bio-diversity net gain where the site allows;
- Uplift in business rates to spend on public services;
- Reduction in vehicle trips and associated noise, air quality and climate considerations;
- 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 campaigns (i.e. Covid-19 Government messaging); 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.

Conditions

As described earlier, it is imperative that digital displays are appropriately controlled to ensure that they are acceptable in amenity and public safety terms. Outsmart, the advertising industry body (formerly the Outdoor Media Centre) has sought to self-regulate by introducing a code of practice that restricts the operation of digital displays adjacent to the highway to static images only, on a rotation of on advert every ten seconds, with a rapid change between images. The ILP Guidelines* have also been widely adopted as a means of controlling the night-time luminance of advertisements. This industry standard forms the basis for conditions applied to the majority of digital advertisement consents.

Wildstone and Outsmart continue to work closely with the Institute of Lighting Professionals to establish best practice guidance on the use of digital displays at night time and during the day. A new ILP guide is currently being prepared.

In accordance with the current best practice approach, 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.

During the daytime 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 a display operating in overcast conditions is included at **Appendix 2**.

The following conditions are proposed for this site:

1. The intensity of the illumination of the sign permitted by this consent shall be no greater than 300cd/m² in the hours of darkness. During the daylight hours the luminance shall be controlled by sensors and/or timers to reflect ambient light conditions. At all times the display shall operate within that recommended by the Institution of Lighting Professionals in its Professional Lighting Guide 05 (PLG 05) Brightness of Illuminated Advertisements (or its equivalent in a replacement guide).

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

2. The minimum display time for each advertisement shall be no less than 10 seconds;

Reason: In accordance with industry code of practice and in the interests of amenity and public safety in order to retain effective planning control.

3. Changes between advertisements to take place instantly with fade effect and no other sequencing, fading, swiping or merging effects;

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

4. No individual advertisement displayed shall at any time contain moving images, animation, intermittent or full motion video images, audio, directional symbols or any images that resemble road signs or traffic signals.

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

* Institute of Lighting Professionals best practice guidance; The Brightness of Illuminated Advertisements PLG05 2015

5. The advertisement display shall at all times contain a feature that will turn the display off (showing a black/blank screen) in the event of malfunction or error.

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

Evidence based justification would be required for deviating from the standard approach in order to meet the six tests as set out in National Planning Policy Guidance (NPPG).

The Site

The proposal Site is located on at 29 The Hill, Northfleet and currently supports one paper and paste billboard. The Site surroundings are residential and commercial in character, although a large-scale industrial area sits to the north and east of the site.

The closest residential properties with a view of the Site are located on the opposite side of The Hill, at 1-2 Granby Place. 1-2 Granby Place is Grade II listed, along with the Garden Wall and Gate Piers to numbers 1-2, which sit in front of the properties. As the windows of these properties face the Site at an oblique angle and view it from over 40m away in the context of a considerable level of street lighting, it is not anticipated that they would be affected by the illumination of the proposed display. It is not considered that this relatively minor development would impact the settings of the heritage assets, especially when considered against the impacts that currently exist due to their location within an urban environment. The plethora of other signage associated with the commercial buildings on The Hill mean that the proposed display would not appear out of place.

The Site falls within The Hill, Northfleet Conservation Area. The Hill, Northfleet Conservation Area Appraisal confirms that the Site falls within Character Area 1: The Hill, which has an urban character and a variety of building form, style, scale, materials and age, and as such is a location where the proposed digital display would not appear out of place.

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 2021 (NPPF) sets out the government's planning policies for England and how these are expected to be applied. In accordance with Paragraph 136 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 development Plan for the area consists of Gravesham Local Plan Core Strategy (2014) and saved Policies from the Gravesham Local Plan First Review (1994). Saved Gravesham Local Plan Policy TC8 (Advertisement Control states that:

"All applications for advertisement consent will be examined in the light of the Borough Council's adopted policy guidelines for advertisement control and displays which are detrimental to public safety or to amenity will be resisted."

While the The Hill, Northfleet Conservation Area Appraisal is relevant to this application, it does not contain any specific guidance for advertising.

Planning Considerations

The proposal will not cumulatively increase the number of adverts in the area and overall the project will see a reduction in the number of advertising sites. The like for like replacement of the display and the control over operation seeks to ensure that the change in the visual impact of the site on the surroundings is de-minimus and not material. Nevertheless, it is acknowledged by the applicant that the change in the type of illumination and the potential to increase the rate of change of the adverts would require express advertisement consent. The impact of these alterations have been considered in amenity and public safety terms as follows:

Amenity

As the proposal seeks to “repost” the existing advert and therefore mimic the existing situation, there will be minimal impact on visual amenity during the daytime. At night, 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.

The context of the surroundings, including illuminated street lighting 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 the existing type of display and the proposed replacement once appropriate controls are put in place, which ensure that a digital advertisement is not over illuminated.

In this instance the size and positioning of the advertisement will remain the same. The hoarding on which the display sits will be replaced.

Examples of digital advertising displays in city centre locations, many of which are within Conservation Areas, or within close proximity other heritage assets have been included in **Appendix 3**. Whilst it is acknowledged that the specific city centre locations are not comparable with the Site, the examples do demonstrate how similar advertisements can be successfully located within Conservation Areas, or in close proximity to other heritage assets.

The existing display, in its current form, has been supported on the Site since at least 2008. As the size and nature of the advertisement has not altered in over ten years the existing signage benefits from deemed consent under Class 13(1) of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007, and the fact of the existing advert being in situ for such a long period without any such action being taken for removal, is a clear indication that it has assimilated into the built environment and is not causing harm to the Conservation Area.

The statistics previously stated within this application demonstrate how commonplace and well established D48 displays have become across the country.

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 sequential change between advertisements is controlled to prevent distraction from the driving task. As the principle of an advertisement is already established at this location, the Council must only consider whether the proposed controls are sufficient to ensure that there is no additional distraction which would cause an unacceptable impact on highway safety. Should the Council's Highways department identify any reasons why the location might be challenging to drivers, the applicant would be open to discussing alternative controls. However, it should be

noted that the proposed conditions are now well established as best practice and as such any change (e.g. to the rate of change) would be unusual and would need to be evidence based and specific to the location.

The proposal Site is in an uncomplicated location which drivers should be able to navigate with ease. The road approaching the Site bends gently straight and is single carriageway. 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. As such, drivers would be entirely capable of glancing at advertisements whilst maintaining stopping distances and an awareness of surrounding traffic movements.

Application Submission

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

- Completed application forms
- Letter Statement (this letter);
- Architectural drawings including;
 - 19893-OS-PLANNING-FINAL-PDF_PP_01 Site Location Plan
 - 19893-OS-PLANNING-FINAL-PDF_PP_02 Existing Site Plan
 - 19893-OS-PLANNING-FINAL-PDF_PP_03 Proposed Site Plan
 - 19893-OS-PLANNING-FINAL-PDF_PP_04 Existing and Proposed Elevation

Additionally, we will arrange payment to Gravesham Borough 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,

Ralph Elliott

Graduate Planner

For and on behalf of Carter Jonas LLP

E: ralph.elliott@carterjonas.co.uk

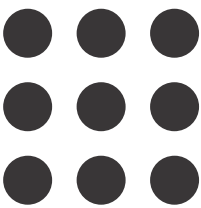
T: 02077589682

M: 075859022782

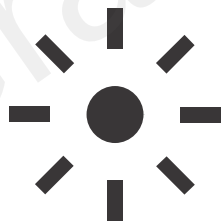
APPENDIX 1 – D-POSTER EXAMPLE

Gravesham Borough Council

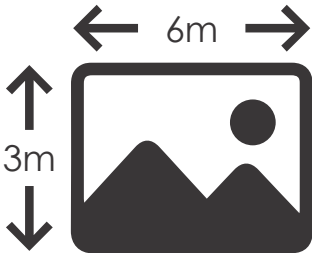
D-POSTER



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 – RECENTLY IMPLEMENTED DIGITAL 48 SHEET POSTER IN DUDLEY
OPERATING DURING OVERCAST WEATHER**

Gravesham Borough Council

Appendix 2



Recently Implemented Digital 48 Sheet Poster in Dudley operating during overcast weather.

APPENDIX 3 – MEDIA SCREENS IN CITY CENTRE LOCATIONS

Gravesham Borough Council

The Screen @ New Street, Birmingham

Site Specification

- Type: Digital
- Screens: 1
- Size: 38 sq.m



Queen Street, Cardiff

Site Specification

- Type: Digital
- Screens: 1
- Size: 54 sq.m



- Existing Screen
- Cathays Park Conservation Area
- Queen Street Conservation Area
- St Mary Street Conservation Area
- Grade I Listed Building
- Grade II Listed Building

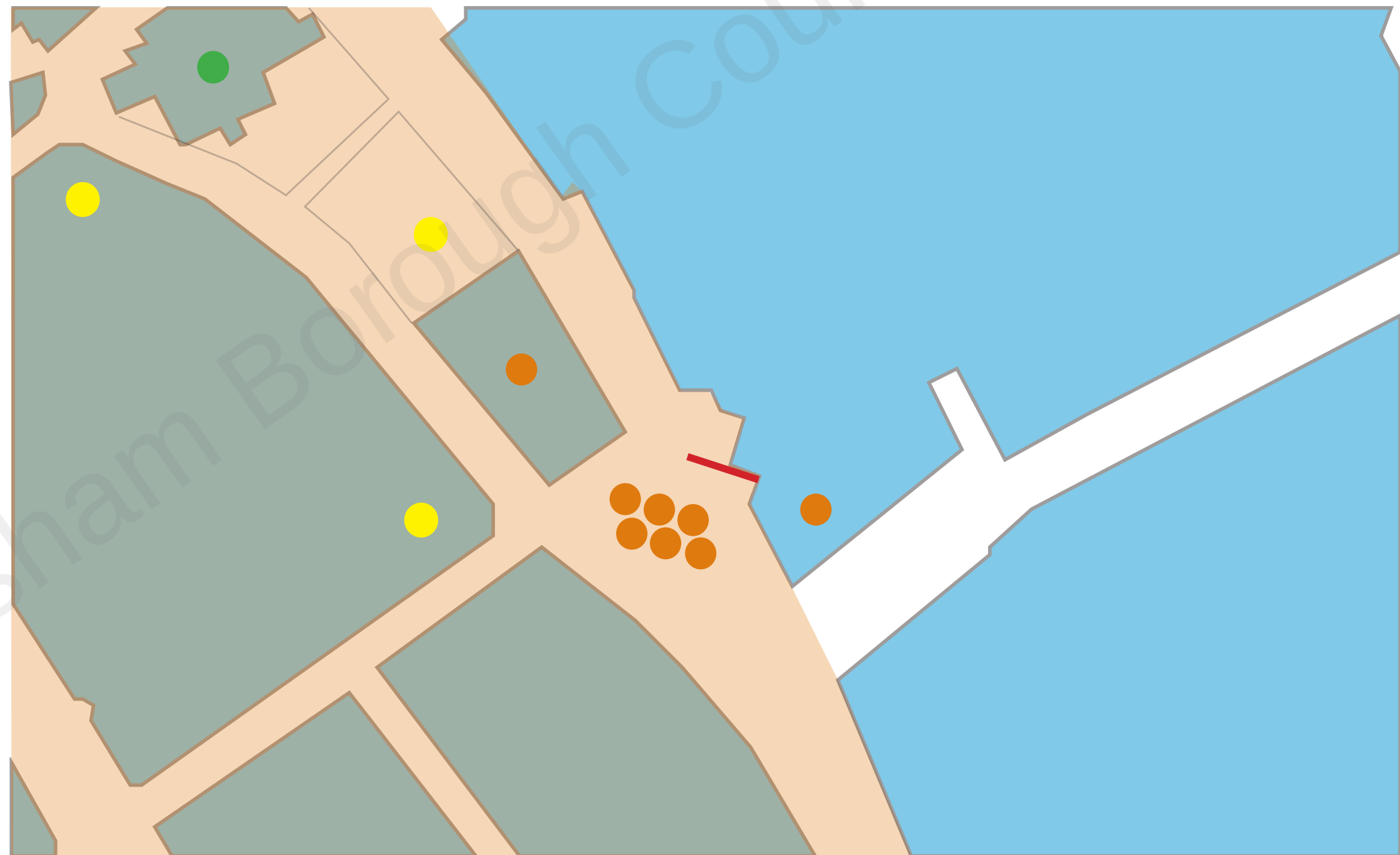
St David's Hall, Cardiff

Site Specification

\\ Type: Digital

\\ Screens: 1

\\ Size: 45 sq.m



- Existing Screen St Mary Street Conservation Area
- Grade I Listed Building Grade II* Listed Building Grade II Listed Building

The Screen @ St Enoch, Glasgow

Site Specification

- Type: Digital
- Screens: 1
- Size: 78 sq.m



- Existing Screen
- Central Conservation Area
- Category A Listed Building
- Category B Listed

The Screen @ Trinity, Leeds

Site Specification

- Type: Digital
- Screens: 1
- Size: 21 sq.m

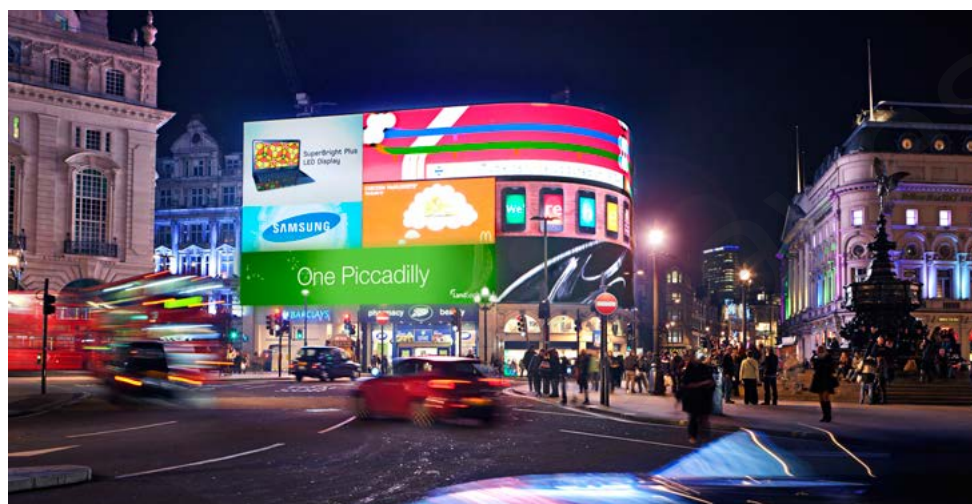
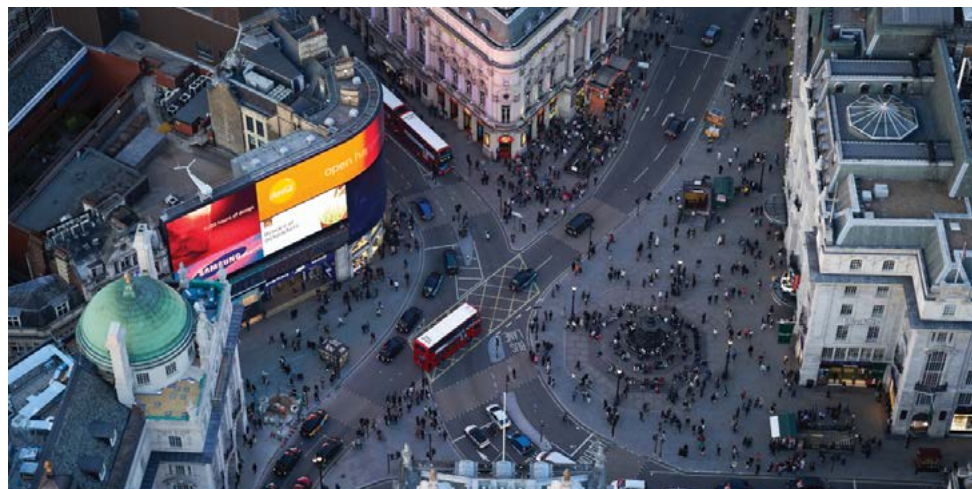


- Existing Screen
- Leeds City Centre Conservation Area
- Grade II* Listed Building
- Grade II Listed Building

Piccadilly Lights, London

Site Specification

- \\ Type: Digital
- \\ Screens: 6
- \\ Size: 767 sq.m



- Existing Screen
- Soho Conservation Area
- Regent Street Conservation Area
- Haymarket Conservation Area
- Grade I Listed Building
- Grade II* Listed Building
- Grade II Listed Building

The Screen @ Lime Street, Liverpool

Site Specification

- Type: Digital Media Wall
- Screens: 1
- Size: 206 sq.m

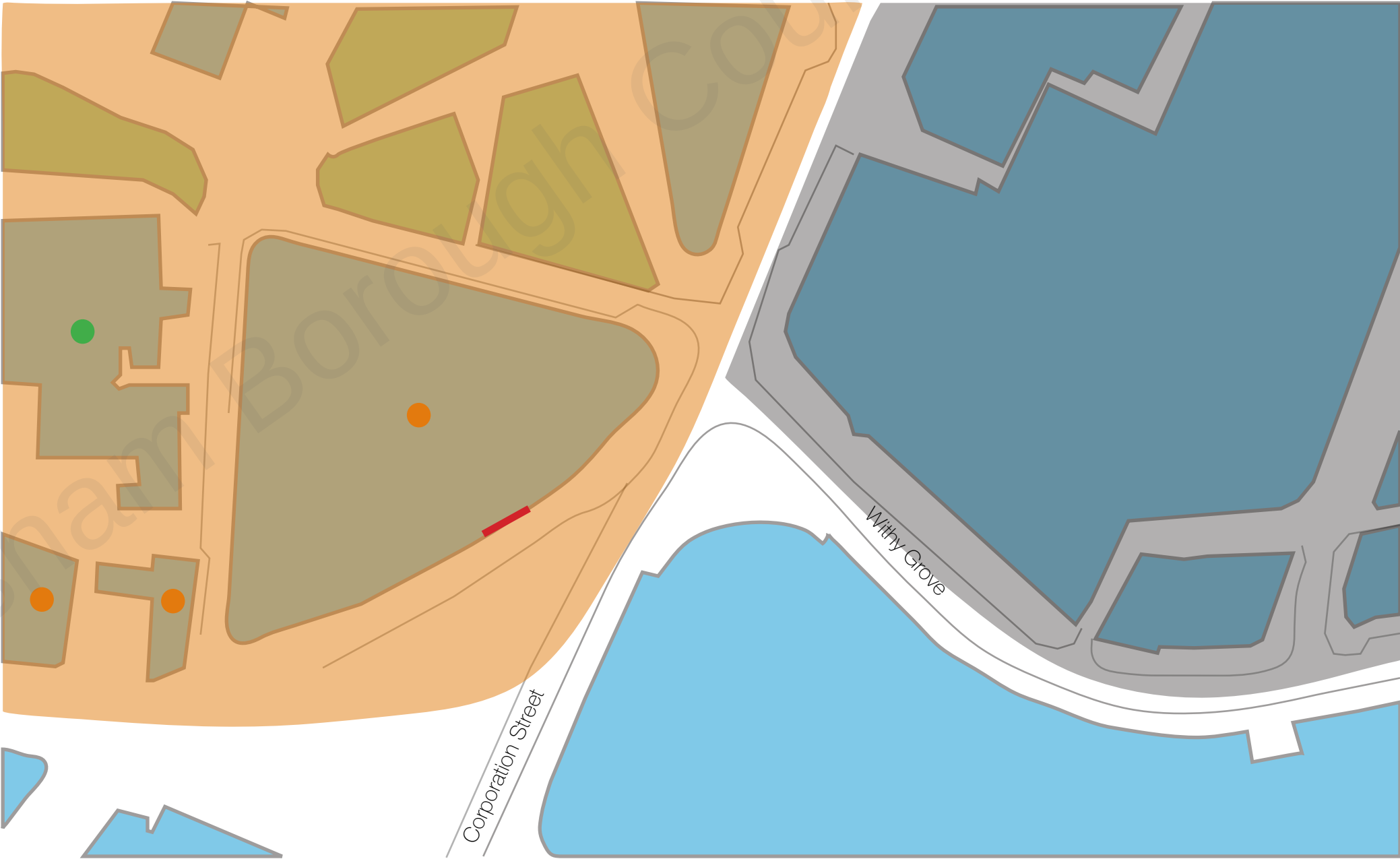


- Existing Screen
- World Heritage Sites Property Boundary and Conservation Area
- Grade I Listed Building
- Grade II Listed Building

BBC Screen, Manchester

Site Specification

- Type: Digital
- Screens: 1
- Size: 25 sq.m

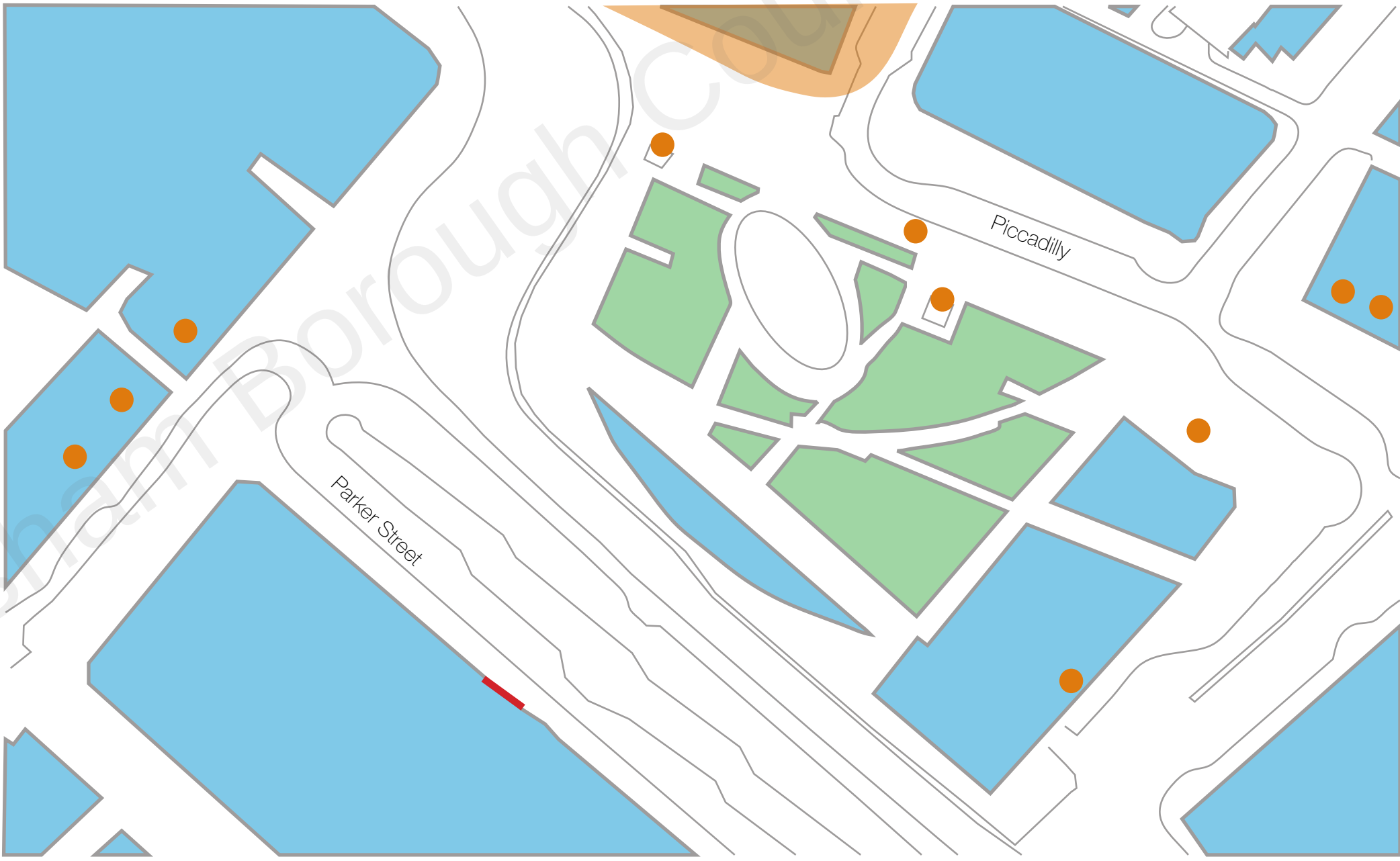


- Existing Screen
- Cathedral Conservation Area
- Shudehill Conservation Area
- Grade II Listed Building
- Grade I Listed Building

Piccadilly Gardens, Manchester

Site Specification

- Type: Full Motion
- Screens: 1
- Size: 25sq.m



Existing Screen Smithfield Conservation Area Grade II Listed Building

Eldon Square, Newcastle

Site Specification

- Type: Full Motion
- Screens: 1
- Size: 22 sq.m



- Existing Screen
- Central Conservation Area
- Grade I Listed Building
- Grade II* Listed Building
- Grade II Listed Building