

Our Ref: JT/93456

20 October 2023



Gravesham Borough Council
Planning Department
Civic Centre
Gravesend
DA12 1AU

**WILDSTONE ESTATES LTD
ADVERTISEMENT CONSENT FOR THE ERECTION OF A REPLACEMENT D-POSTER
ADVERTISEMENT
175 HIGH STREET, NORTHFLEET, GRAVESEND, DA11 9HG
PLANNING PORTAL REFERENCE: PP-12545464**

Dear Sirs/Madam,

Please find enclosed an application for advertisement consent for a gable end digital-48 sheet advertisement at the above site to replace the existing paper-and-paste advertisement. The site has been selected due to its history of 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 the current traditional poster-and-paste billboard.

This proposal 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 paper-and-paste advertisements and developing new sites in better locations. The overall strategy is to reduce the number 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 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.

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As the landowner, 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 the landlord to all of the major operators, Wildstone is 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 erect a gable end D-Poster display at 175 High Street which will display multiple static advertisements on rotation. The site currently supports a traditional paper billboard.

The proposed panel has the same dimensions as the current standard 48-sheet hoarding, measuring 6m(w) x 3m(h), with a slightly reduced depth of 0.15m. The display will be positioned 4.45m above ground. The proposal will also involve the removal of the existing externally illuminated advert on the elevation. The proposed new display technology is lightweight, durable, efficient and can be easily erected with minimal engineering. In most instances, the erection of a D-Poster can be achieved at a similar speed to a traditional display, with minimal structural work. The quality of the image produced will mimic that of a traditional poster 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 proposal is submitted as part of a nationwide 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** there has been an overall reduction in the volume of advertising panels over an extended period, even though the number of digital sites is increasing.

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 posters 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.

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Classic & Digital Roadside 48 sheets: 2015-2022

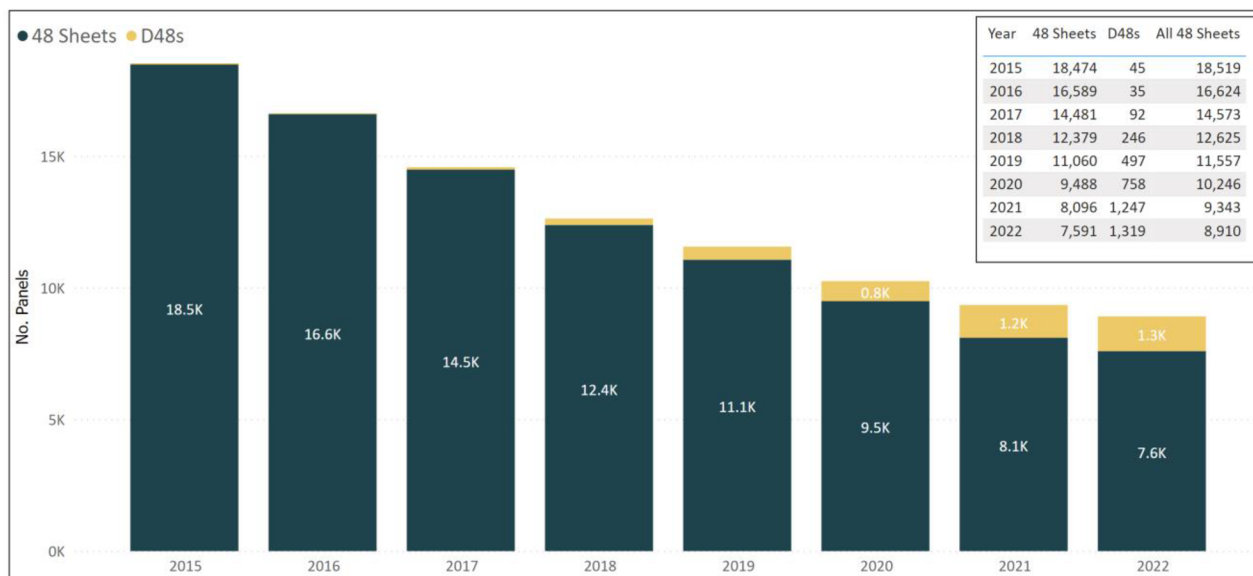


Figure 1 – Reduction in 48-sheet advertising 2015-2022

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.

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, 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 during different times of the day are included in **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 forward. The model conditions are set out within Appendix 1 of Technical Note 5 “The Brightness of Illuminated Advertisements including Digital Displays” (PLG05/23) and have been used as the basis for the proposed conditions set out in **Appendix 3** of this statement.

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The Site

The proposal site is located on the gable end of a terrace facing onto a small car park. The host terrace has a mix of commercial uses on the ground level with residential dwellings on the first floor. To the west of the site, past the car park, there are more dwellings with the corner unit being occupied by a takeaway at ground level. There are more residential dwellings to the north and south of the site. The site currently supports a non-illuminated paper display which has been in place since at least September 2008.

The surroundings are a mix of commercial and residential. The commercial units are located along the southern side of High Street and Stonebridge Road, to the east and west of the site and are located on the ground floor level of the buildings. There are residential dwellings on the upper floors of the terraces, along with more dwellings being located to the north, along College Road, and to the south, along Station Road.

Following 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 closest residential dwelling that would have a view of the proposed advertisement is located 20 metres to the west of the site.

The site is not within the context of a conservation area and is not close to any nationally or locally listed buildings.

There is a plethora of other advertisements present in the area relating to the different surrounding commercial uses. The advertisements are primarily located on the southern side of High Street and range from small to large scale. There is a mix of illuminated and non-illuminated signage.

The proposal site is an established location for advertising, having supported an advertisement in this location since at least 2008. As the advertisement displayed on the site has been in place continually for ten years it benefits from deemed consent under Class 13 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007. The billboard is shown in 2008 in **Figure 2**.

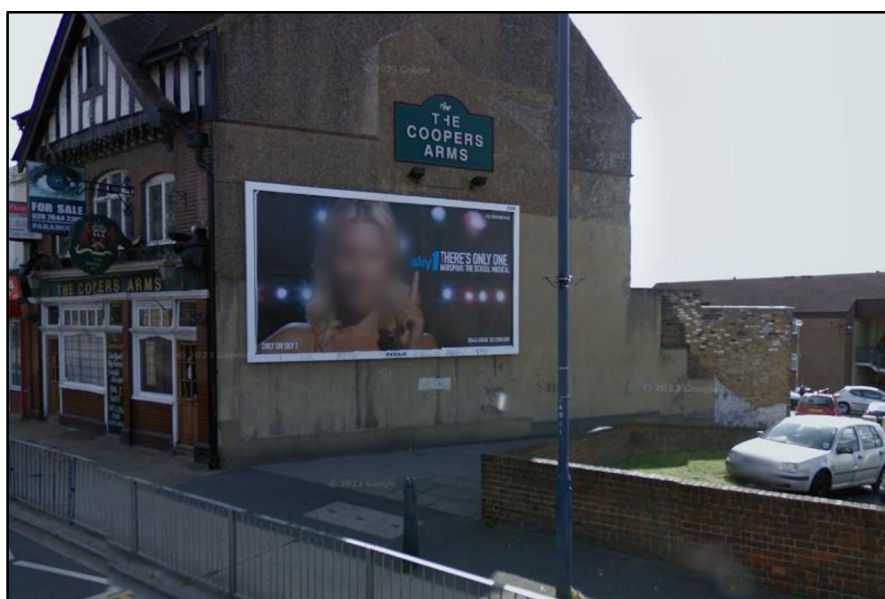


Figure 2 – Billboard in place in April 2011 (Google Maps)

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Two historic applications for advertisement consent are present on the Council's public access website. These applications were both for the display of one 48-sheet advertisement hoarding on the side elevation of the building and were both refused, first in 1984 (ref: 19840524) and 1985 (ref: 19850498). The applications were both refused on amenity and public safety grounds. The current billboard has been in place for over 10 years without any action being taken against it.

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. Following 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 the Gravesham Local Plan Core Strategy (2014) and First Review - Saved Policies. The Local Plan has no specific policies concerning advertising. Policy CS19 (Development and Design Principles) seeks for new development to be visually attractive, locally distinctive and to conserve and enhance the character of the local built and historic environment. It goes on to ensure that development will be located and designed to safeguard amenity and avoid adverse environmental impacts from light pollution.

Planning Considerations

The proposal seeks to erect a free-standing 48-sheet advert at the gable end of 175 High Street. The location currently supports a non-illuminated paper billboard. The location is appropriate in principle for advertising and the impact of the proposal has been considered in amenity and public safety terms as follows:

Amenity

The proposed sign will be in an established location for advertisements of this scale. The current billboard has been in place for over 10 years. The proposal seeks to erect a new 48-sheet-sized D-Poster in place of the previous paper billboard.

Signage of this nature is commonly found in similar settings. Examples of installed digital screens can be found in **Appendix 4. Figure 3** and **Figure 4** below show a billboard being converted into a digital screen.

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Figure 3 - Free Standing Billboard (Google Maps)



Figure 4 – Free Standing Digital Screen (Google Maps)

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The side-by-side comparison photograph on the D-Poster information sheet (**Appendix 1**) helps to illustrate the minimal difference between the previous type of display and the proposed D-Poster once appropriate controls are put in place, which ensures that the digital advertisement is not over-illuminated.

When compared to the current billboard, the proposed display will have the same amount of advertising space and will be the same size, while being slightly thinner. With the new location, the other illuminated advertisement on the elevation will be removed, meaning overall on the elevation there will be a reduction in advertising space. With the controls in place on the D-Poster, there will be a minimal difference between the proposed and a traditional paper billboard.

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. When viewed, the new display will have the same impact as the existing display and will not change the setting of the surroundings. The surrounding signage on High Street and the current billboard show that the area is appropriate as appropriate for an advertisement of this type.

The display is positioned such that it will not impact the amenity of any of the nearby residential dwellings. During the daytime, the poster will be presented as a traditional paper-and-paste advertisement hoarding. Controls are in place to ensure that the advertisement display is never overly illuminated, but sensors within the display can gauge the lighting levels and adjust the brightness of the display accordingly. Following the categorisations set out in the newly published ILP Guide PLG 05/23, the maximum night-time luminance of the display should be set at 300cd/m². The level of illumination will reflect local and ambient conditions, with little material change to the site as it currently exists since the street is already well-lit by lighting columns and commercial premises.

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. The current billboard has been in place for over 10 years.

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. 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 need to be evidence-based and be specific to the location.

Digital advertising is now a common feature in town centres and adjacent to major roads across the Country. There are now over 1,300 digital 48 sheets in the UK, operating without issue in a wide variety of roadside environments. 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 proposed display would occupy the same elevation as the current advertisement. The sign is predominantly seen by those travelling east along Stonebridge Road and High Street.

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Stonebridge Road and High Street are well-lit, level highway which maintains good forward visibility, with speed controls of 30mph. The roads are single-carriageway ways with few elements to distract drivers. As such drivers would be entirely capable of glancing at advertisements whilst maintaining stopping distances and an awareness of surrounding traffic movements.

This site is an established location for the proposed advertisement and there will be no further distraction for drivers. Any driver exercising a standard level of care while travelling on Stonebridge Road / High Street will be able to navigate the area with ease. 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.

Under these circumstances, such a familiar feature of High Street and the surrounding highway network would not constitute a hazardous distraction to anyone exercising a reasonable standard of care. Consequently, the proposal would not give rise to any public safety issues, which would prevent the granting of express advertisement consent.

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 bio-diversity net gain where the site allows;
- Uplift in business rates to spend on public services;
- Reduction in vehicle trips and association 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, providing a local economic benefit;
- 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 development benefits that will not be achieved by maintaining the status quo.

Conclusion

The proposal seeks to erect a new D-Poster in place of an existing paper billboard. The existing billboard has been in place for over ten years and currently benefits from deemed consent. The proposed display will be the same scale as the existing billboard, with a reduced depth.

The proposal will be located in an area of mixed character, in a position where advertising of this type is commonplace. 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.

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Application Submission

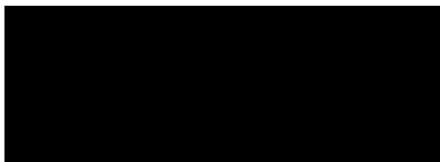
To complete the application, please find attached the following documentation:

- Completed application forms.
- Letter Statement (this letter).
- Appendix 1 – Side by Side Examples.
- Appendix 2 – Lighting Conditions.
- Appendix 3 – Model Conditions.
- Appendix 4 – Digital Screen Examples.
- Architectural drawings including;
 - 9391_Site Location Plan
 - 9391_Existing Site Plan
 - 9391_Proposed Site Plan
 - 9391_Existing and Proposed Elevations

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 concerning any of the attached information, please do not hesitate to contact me.

Yours faithfully
for ALDER KING LLP



JAMES TARPY
Town Planner

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Enc(s)	as above