5 April 2022

South Holland District Council
Council Offices
Priory Road
Spalding
Lincolnshire
PE11 2XE

Dear Sir/Madam,

Town and Country Planning (Control of Advertisements) (England) Regulations 2007

D-poster advertisement: Land at Pinchbeck Road (adjacent 2 West Elloe Avenue), Spalding, PE11 2BH

Please find enclosed an application for advertisement consent for a freestanding "D-Poster" advertising display at the above site. The D-Poster is a digital equivalent of a traditional poster and paste 48-sheet advert and can carry 6 advertisement campaigns at a time.

Background

The Council granted express consent for a 48-sheet (6m x 3m) "D-Poster" digital display at the site during January 2021, under reference H16-1039-21. The digital display was built out in January 2022 and replaced two longstanding illuminated paper and paste units.

The Proposal

The proposal seeks to erect a freestanding 48-sheet "D-Poster" digital display measuring 6m(w) x 3m(h) x 0.1m (d). It would be elevated to 1.8m above ground level and be positioned to the rear of the existing digital unit. The new digital technology is lightweight, durable, efficient, with the quality of images produced mimicking that of the previous paper and paste displays. The display would be easily erected with minimal engineering required, and would appear identical to current digital unit in operation.

The proposed display will meet modern advertising and industry requirements, carrying six images, presented in a ten second automated sequence. The ability to deliver multiple adverts and the willingness of the advertising industry to invest in the

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best sites, has led to digital advertising becoming the mainstream and preferred industry format. There are now over 850 digital 48-sheet advertisements across the UK, and as such, there is a clear pattern of digital advertising becoming a standard feature of the highway, and street scene. The digital format not only benefits the advertising industry, but also provides a range of public benefits which include:

- Investment in the area including generation of business rates on vacant sites;
- Ability to broadcast emergency messaging (e.g. public health messaging);
- Ability to use void periods for non-commercial campaigns;
- Creative, real time, and locally relevant advertising;
- Preferential advertising rates for local businesses; and
- Integrated hardware to meet Smart City Objectives

Operation

Content will be controlled remotely in real time from a Network Operation Centre (NOC) and the site will be monitored remotely 24/7 to facilitate responsive maintenance. Diagnostics software will report and resolve the majority of issues remotely.

The display would be limited to a maximum of 300cd/m2 at night time in accordance with the Institute of Lighting Professionals best practice guidance; *The Brightness of Illuminated Advertisements PLG05 2015*. This would be based on a worst-case scenario of a full white display and as such will be below this level when showing content. The screen will be set to switch to the night-time operational mode between dusk and dawn, adjusting on a daily basis to follow the changes in the seasons. The change between daytime and night time modes takes place gradually to avoid sudden changes in contrast.

During the daytime ambient light sensors will monitor conditions in real time and alert the display to lower light levels to ensure that it is not overly bright during periods of moderate or low luminance, as shown in the images below for a digital display located on Godstone Road, Whyteleafe, Surrey, CR3 0EA.







An implemented 48-sheet D-Poster in Godstone operating during cloudy weather conditions alongside paper and paste displays.

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;
- Advertisements to change no more frequently than once every ten seconds;
- At no time shall the Luminance level of the signs exceed the thresholds contained within the Institute of Lighting Professionals (ILP) guidance document PLG05 – The Brightness of Illuminated Advertisements 2015.

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).

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 under paragraph 136 reiterates the need for assessment to conduced only in the interests of amenity and public safety, taking account of cumulative impacts. National guidance provides further clarification and identifies that the regime for advertising consent should be a 'lighter touch' than the system for obtaining planning permission for development.

The Site

The proposal site is an existing, and long established advertising site. The site hosts a north facing digital adverting display operating under express consent H16-1039-21 (granted 24/11/21). The site lies adjacent to the corner junction of the A151 Pinchbeck Road, and west Elloe Avenue. To the north of the site lies a cemetery and the Pinchbeck Road. To the south lie residential properties set back from the Pinchbeck Road which travels southwards past the site. To the west is an area of cleared land

and the East Midlands mainline railway which serves Spalding station to the south. To the south-west is a setback, and well screened, residential block. The site is not covered by any policy designations under the adopted (March 2019) South East Lincolnshire Local Plan (2011-2036). There are no Listed buildings, Conservation Areas, or local heritage designations within the immediate or wider surroundings.

Planning Considerations

The proposal site is an established location for advertising, having supported the presentation of illuminated adverts for over 15 years, with the site's first documented usage dating back to 2006. The presence and operation of the north facing digital display establishes the acceptance of digital advertising at this location. However, it is acknowledged by the applicant that any further application for advertising consent would require assessment in relation to potential impacts upon amenity and public safety. These are considered below.

Amenity

Concerning amenity, the proposal would not be detrimental in either and immediate or wider sense. It is not within a Conservation Area, attached or adjacent to a Listed building, within proximity of any local heritage assets, or likely to impact upon any potentially sensitive receptors.

The careful positioning of the proposed display will complement the site, adding both balance and symmetry through its identical appearance. It will mirror the existing digital display and face in a southerly direction. To ensure the proposed display successfully integrates to the street scene, strict control will be placed on the operation of the display. Advertisements will be limited to an update once every 10 seconds, changes between advertisements will be near instant with no accompanying effects, and Illumination will be limited to 300cd/sqm at night in accordance with the Institute of Lighting Professionals best practice guidance; The Brightness of Illuminated Advertisements PLG 05 2015. Under these conditions, and taking account of the extensive luminance provided by street lighting surrounding the site, it is ensured that the proposed display would not cause any material harm to the amenity of the immediate or wider area.

Moreover, as the proposal is to the rear of the existing digital display, it would ensure the site remains free of clutter and any cumulative effects. The proposed south facing digital display would therefore sit comfortably in its visual context, without harming the qualities of the site, or the appearance of the street scene and surrounding environment.

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 appropriately controlled to prevent distraction from the driving task.

The proposed display would occupy the same elevated position as the existing (and identical) north facing digital display granted express consent by the Council. Sight lines and visibility splays would therefore be maintained. The proposed south facing

display would be seen by traffic travelling northbound on Pinchbeck Road which is limited to 30mph, is well lit, straight, level, and has excellent forward visibility. Highway users would therefore by fully capable of glancing content far in advance of the site without being distracted from the road or traffic conditions ahead. 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 viewing advertisements whilst maintaining stopping distances and an awareness of surrounding traffic movements.

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.

However, under the above circumstances, such a familiar and established feature of the Pinchback Road and 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 public safety issues which would prevent the granting of an express advertisement consent.

Conclusion

The proposal to erect a digital advertising display at the Pinchbeck Road advertising site is considered to have a neutral impact upon the amenity of the site and surrounding area. The sighting of the proposed display would be to the rear of an existing digital display operating with express consent, having been granted advertising consent by the Council during January 2021. The proposed unit will complement the existing unit adding symmetry and balance to the site, whilst the strict controls over illumination and the operation of the display, will ensure that it successfully integrates to the street scene and remains respectful of its environment.

In terms of public safety, the adjacent highway is uncomplex and allows drivers ample opportunity to glance content without losing sight of the road or traffic conditions ahead. Highways users would therefore be entirely capable of viewing content without endangering public 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 form prepared by Wildstone;
- Letter Statement prepared by Wildstone (this letter);
- Architectural drawings prepared by Wildstone;
    - 19630_PA_01 Site Location Plan
    - 19630_PA_02 Existing Site Plan

- 19630_PA_03 Proposed Site Plan
- 19630_PA_04 Elevations – Existing & Proposed
- 19630_PA_05 Elevations – Existing & Proposed

Additionally, we will arrange payment to Sandwell 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,

RP

Richard Page
Planner
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