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BY PLANNING PORTAL

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

31871/A5
24th September 2021

Dear Sir/Madam,

Town and Country Planning (Control of Advertisements) (England) Regulations 2007
Conversion of poster advertisement display at Pinchbeck Road, Spalding, PE11 1QL

Please find enclosed an application for advertisement consent to upgrade a location that has historically displayed two advertising hoardings to a single modern digital format capable of being operated from a central location without the need to visit each site individually.

This is part of an industry wide drive to modernise and upgrade advertising infrastructure to meet modern requirements. It is proposed to replace the existing two advertising displays (fixed by way of a paper and paste hoarding) and consolidate to a single display using technology that is lightweight, durable, efficient, and can be easily erected, as it is of similar size and scale to the existing unit.

The Proposal

The proposal seeks to update the existing displays on the corner of Pinchbeck Road and West Elloe Avenue with a single digital equivalent which will display static advertisements on rotation.

The scheme will meet modern requirements of advertisers. This will bring a wide range of benefits as follows:

- Upgrade of sites lacking in investment;
- Reduction in vehicle trips for reposting adverts (i.e. from an average of 34 trips to 2);
- Consolidation and overall reduction in the number of advertising displays in the network and on this site;
- Eradicating the need to print posters and avoiding the associated waste involved in the production process;
- Ability to broadcast emergency messaging (e.g. public health messaging);
- Ability to use void periods for non-commercial campaigns;
- Opportunity for more creative real time and locally relevant advertising; and
- Opportunity to integrate additional hardware to meet Smart City objectives.

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Content will be controlled remotely in real time from a Networks 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 300cd/m2 at night time (on a full white display) in accordance with the Institute of Lighting Professionals best practice guidance; *The Brightness of Illuminated Advertisements PLG05 2015* and will adjust according to ambient brightness. The level of illuminance will be set on site manually to be at an appropriate level for the area and to mimic the poster being replaced.

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;
- Maximum level of night-time illuminance to be set to 300cd/m2 in accordance with ILP Guidelines; and
- Advertisements to change no more frequently than once every ten seconds.

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).

The Site

The proposal site is located to the corner junction of the A151 and West Elloe Avenue and comprises of two advertisement hoardings which face in a northerly and southerly direction. The proposal site is an established location for advertising, having supported an advert display for over 10 years, as demonstrated in Appendix 1. As the size and nature of both existing advertisements have not altered in over ten years the signage benefits from deemed consent under Class 13(1) of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

Directly opposite the displays to the west is a vacant site and residential properties are positioned the A151 and are set back from the road.

The Site is not located within a conservation area, nor is located within the setting of a heritage asset.

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 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

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policies are considered necessary to protect the unique character of a particular area, these should be evidence-based.

Planning Considerations

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 has been considered in amenity and public safety terms as follows:

Amenity

On a strategic level the digitisation of the advertising network will see an overall reduction in the number of advertising sites in the area.

As the proposal seeks to reduce the number of advertisement hoardings from two to one (a net reduction) and replicate one of the existing adverts through mimicking the paper and paste hoarding that has been in place for more than 10 years, there will be an improved impact on the visual amenity of the surroundings. The size and positioning of the advertisement display will remain the same for the advert facing a northerly direction, with the advert currently facing a southerly direction to be permanently removed. The current and historical advert displays and the level of illumination will reflect local and ambient conditions, with little material change to the site as it currently exists.

The controls proposed over the level of luminance at night are in line with the ILP Guidelines and industry best practice and will ensure that the proposed display does not cause any material harm to amenity. The context of the surroundings, the existing street lighting establishes the site as appropriate for an illuminated advert of this type. Additional controls over the display will be considered if necessary to remedy a specific amenity concern.

The proposal would not be detrimental in either an immediate or wider sense. The proposed advert facing in a northerly direction is significant distance from the nearest residential property and to the west of the advert is a vacant site. In this regard, the proposal should be considered acceptable.

Given the existing street lighting that is currently in place, the net reduction from two adverts to one, it is considered that there would be little, if any, material change in the appearance of the street scene. The proposed display would not amount to clutter or contribute to any cumulative impacts, sitting comfortably in its visual context without harming amenity, the qualities of the site, or the character and appearance of the wider area.

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 has already been 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 need to be evidence based and be specific to the location.

The proposed display would occupy the same elevated position as the existing northerly facing display, ensuring site lines and visibility splays are maintained. It would be seen by traffic travelling southbound, 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.

Under these circumstances, such a familiar feature of 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 will not change the size or orientation of the existing northerly facing advertising display. The existing southerly facing display is proposed to be removed therefore resulting in a net reduction of advertising hoardings. As such the established acceptability of the advertisement should not change materially. The proposed conditions to control the luminance of the screens and the operation of the digital screens will ensure that there is no additional harm to amenity or road safety.

For these reasons and the positive benefits set out above, 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 prepared by Barton Willmore;
- Letter Statement prepared by Barton Willmore (this letter);
- Architectural drawings:
    - *PA/01 Site Location Plan*
    - *PA/02 Existing Site Plan*
    - *PA/03 Proposed Site Plan*
    - *PA/04 Existing & Proposed Elevations*
    - *PA/05 Existing & Proposed Elevations*

Additionally, we will arrange payment to South Holland District Council for the sum of £462 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,



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Enc.

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Appendix 1

March 2009:



June 2011:



September 2018:

