

Worthing Borough Council
Portland House
44 Richmond Road
Worthing
BN11 1HS

02 June 2026

Dear Sir / Madam

ARUNDEL ROAD, WORTHING, BN13 3EH ERECTION OF 2X D6 SMALL FORMAT ADVERTISEMENT DISPLAYS

This cover letter has been prepared on behalf of Wildstone Estates Limited, an outdoor media infrastructure provider, and is submitted in support of an application for advertisement consent to erect a single-sided freestanding D6 small format advertisement display at the above site.

The Site comprises a Petrol Filling Station (PFS) owned by Motor Fuel Group (MFG), the largest independent forecourt operator in the UK. The Company currently has around 1,200 sites which offer customers a growing dual-fuel strategy, a versatile valeting offer and a convenient retail and 'food to go' portfolio.

Wildstone Estates Limited is working in partnership with MFG to modernise existing advertising infrastructure across the MFG portfolio and where possible to rationalise and declutter existing advertisements, which aligns with an industry wide programme.

The Proposal

The Site currently consists of a number of business signs at the petrol station, which are to be removed as part of the proposal and replaced with two single-sided freestanding D6 small format advertising displays which will exhibit static advertisements on rotation, which will result in a significant reduction in advertisements as shown in the submitted CGI image and **Figure 1**.

These are standard small format advertisements, which are found across the UK in roadside, retail and transportation environments. There are over 75,000 6-sheets in the UK. The advertisements which are the subject of this application are primarily aimed at users of the PFS rather than road users.

The proposed D6 small format advertisement displays have the same dimensions as a standard 6-sheet hoarding, measuring 1.23m(w) x 2.4m(h) x 0.22m(d). The proposed advertisements will utilise LCD digital technology, which is durable, efficient and can be easily erected with minimal engineering. The quality of the image produced will mimic that of a traditional paper and paste display (**Appendix 1**). The proposed displays will meet modern requirements and will be capable of displaying 6 advertising campaigns at a time, sequencing every ten seconds. The advertisements will comprise local and national campaigns as well as goods and services sold on site.

The D6 small format advertisement displays will be monitored and controlled remotely in real time from a Network Operation Centre (NOC) to display advertisements and facilitate responsive maintenance where

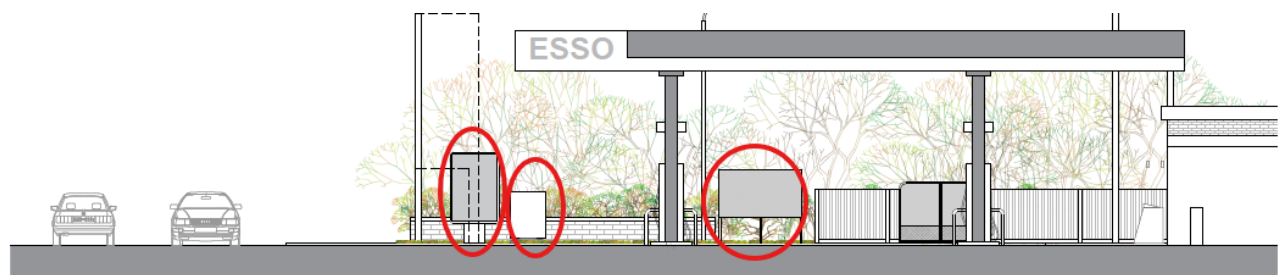
necessary. Diagnostics software can report any small technical faults (e.g. a broken panel) so that a kill switch can turn the content to black. Engineers are able to respond within 24 hours to any issues which require attendance.



Panel A - BEFORE



Panel A - AFTER



Panel B - Existing



Panel B - Proposed

Figure 1 – Removal of Existing Signages (circled in red).

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.

The proposed displays will operate with a system of threshold controls, timers and light sensors to ensure that the luminance never exceeds the ILP guideline figure at nighttime, with lower thresholds set on more sensitive sites.

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 2** of this statement for clarity.

The Site

The Site is a long-established site as a petrol station within the Built Up Area Boundary.

The proposal site is located within the wholly commercial entity of the PFS and the D6 small format advertisement displays will be positioned within the site boundary. The Site's immediate context and surroundings are a mix of commercial and residential in character, with the PFS including a retail unit, together with a car garage to the south, where advertisements such as that proposed should be positioned.

The panels have also been positioned so as to be viewed predominately by users of the PFS directly facing the petrol forecourt, without any impact on surrounding area, including nearby residential properties in the vicinity.

The nearest residential properties are located at Arundel Road immediately to the west of the Site. Given the scale, orientation and position of the proposed displays, the illumination at the existing petrol filling station that has already operated 24 hours a day, the proposed controls over illumination and the boundary trees of the relevant properties, we consider that the proposal will have no impact on the relevant properties.

The Site does not contain or adjoin any Conservation Area or heritage assets.

The Site is located approximately 20m away from the edge of the South Down National Park on the opposite side of the A27 Arundel Road. However, given the intervening highway infrastructure, the scale, orientation and position of the proposed display, the built up nature of the existing site and surrounding area that have limited contributions to the beauty and character of the South Down National Park, the scale and illumination of the existing structure and canopy of the petrol station that operates 24 hours a day, the significant reduction in signage as a consequence of the proposals, the commercial context of the site, and the proposed controls over illumination, we consider the proposal will have no impact on the character and beauty of the South Down National Park.

The Site is in a location where advertising of this type would typically be found. There are other smaller advertising displays in the vicinity, most of which are associated with commercial buildings in the area. There are other poster advertisements in the locality including a similar format digital display approved at 1 Fulbeck Way, BN13 3FG (AWDM/1053/20), which is approximately 1.1km to the southwest of the Site. The Officer Report for this application confirms that the Site's location, scale, height and format would have no impact on the visual amenity of the locality. As such, the proposed displays in a similar context should be considered acceptable.

In accordance with 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 Site is in a location where advertising of this type would typically be found.



Figure 2 – Google Street View image of the Site (August 2024)

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 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 statutory Development Plan for the area consists of Worthing Local Plan (2023). The Council does not have any specific policies in relation to advertising.

Planning Considerations

The proposed commercial location is considered to be appropriate in principle for two D6 small format advertisement displays and in line with planning regulations, the impact of the proposal has been considered in amenity and public safety terms and is addressed in turn below.

Amenity

The Site has been selected as an acceptable location for advertising in principle due to the immediate commercial context. Within the adopted Development Plan, the Site is a long-established site as a petrol station within the Built Up Area Boundary.

The Site's immediate context and surroundings are a mix of commercial and residential in character, with the PFS including a retail unit, together with a car garage to the south, where advertisements such as that proposed should be positioned.

The proposal proactively seeks to upgrade and improve the existing advertising site, through removing a number of business signs in this location, which will result in a significant reduction in advertising, as shown in the submitted CGI image and **Figure 1**.

The Site is a PFS and is a highly commercial site, situated on a busy road which is considered to be an appropriate location in principle for digital advertising. The advertisements would be viewed within the context of the petrol station, the scale of the large existing canopy and shop, and would as such not appear out of scale with its immediate environment. They would not appear out of place and will sit positively within the surrounding area and the existing character. The panels have also been positioned so as to minimise any impacts on the surrounding area directly facing the petrol forecourt.

The proposal being sought is of a temporary nature and the suitability of the Site has been assessed on the basis of the current environment. The proposal would not be detrimental in either an immediate or wider sense and would be appropriately located.

The Site does not contain or adjoin any Conservation Area or heritage assets.

The Site is located approximately 20m away from the edge of the South Down National Park on the opposite side of the A27 Arundel Road. However, given the intervening highway infrastructure, the scale, orientation and position of the proposed display, the built up nature of the existing site and surrounding area that have limited contributions to the beauty and character of the South Down National Park, the scale and illumination of the existing structure and canopy of the petrol station that operates 24 hours a day, the significant reduction in signage as a consequence of the proposals, the commercial context of the site, and the proposed controls over illumination, we consider the proposal will have no impact on the character and beauty of the South Down National Park.

The Site is located within a suburban area in which a brightness level of 300cd/sqm is considered acceptable during nighttime. The nearest residential properties are located at Arundel Road immediately to the west of the Site. Given the scale, orientation and position of the proposed displays, the illumination at the existing petrol filling station that has already operated 24 hours a day, the proposed controls over illumination and the boundary trees of the relevant properties, we consider that the proposal will have no impact on the relevant properties.

The context of the surroundings, including other illuminated (both internally or externally) display adverts, street lighting, and floodlighting at the PFS, establishes the Site as appropriate for an illuminated advert of this type.

The proposed panels will upgrade and modernise the site in line with the long-term aspirations to modernise the MFG PFS estate to meet customer requirements. They will add value to the wider regeneration and sit comfortably within the existing site and wider surrounding area.

As such, the proposal would not be detrimental in either an immediate or wider sense.

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 considered to be acceptable at this location, the Council must 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. It would be visible by traffic travelling east and west along Arundel Road, which is 40mph, straight, level, well-lit and has excellent forward visibility. 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. Given the long-range visibility, drivers will be able to easily assimilate the information on the displays.

While the proposed digital displays are situated at the ingress and egress of the petrol filling station, a Highway Safety Report prepared by SLR has been submitted, which confirms that a PFS is an established commercial roadside environment where motorists already expect to encounter signage, including fuel price displays and forecourt branding, and therefore approaching or passing drivers are accustomed to the presence of commercial messaging within the roadside environment.

Given the typical visual context associated with PFS, the presence of a digital display in proximity to this type of commercial land use would be consistent with the established character of the location and would not represent an unusual or unexpected roadside feature from a driver's or pedestrians' perspective. Together with the controls as proposed, it is considered that there will be no adverse impact on highway safety.

The proposal proactively seeks to upgrade and improve the existing advertising site, through removing a number of business signs in this location, which will result in a significant reduction in advertising in this location and will reduce any potential driver's distraction, as shown in the submitted CGI image and **Figure 1**.

The Site is located adjacent to a busy highway, where advertising of this type would typically be found. The panel has been positioned to ensure that no driver visibility is blocked for users of the PFS traveling in the vicinity.

Although the sign will attract attention, as all signs are designed to do, it is not considered that the proposed display is so unusual or the road characteristics so complicated that an advertisement in this location would cause a public safety concern. The proposed panel would incorporate illumination levels which align with the ILP's Guidance and this intensity is considered wholly acceptable for the location.

Furthermore, according to crashmap.co.uk there have been two accidents on the approach to the site in the past 5 years (all of which were classified as 'slight'). However, given that there is no evidence to suggest that the existing signage has directly contributed to past accidents, and that there is no evidence that a static digital advertisement display is any more distracting than a paper and paste advert, it is not considered that the scheme would result in significant visual distractions to motorists using the surrounding road networks. As such, the proposal should be considered acceptable.

Conclusion

The proposal seeks to erect two D6 small format digital advertising panels at the Site which is considered to be an appropriate location for advertising in principle and will contribute to the wider modernisation of the sites which sit within the MFG portfolio.

The size and scale of the D6 small format advertisement displays are de-minimis in the context of the PFS. PFS sites are an appropriate location in principle for this form of advertising and the positioning and operational controls have been carefully considered to ensure that the proposed 6-sheet digital advertising displays fit in appropriately to the Site and the wider surrounding area and will have a negligible impact on public safety.

The proposed conditions to control the operation of the advertisements including the luminance of the digital display will ensure that there is no adverse impact on visual or residential amenity or public safety.

For these reasons and the positive benefits set out, it is not considered that the proposal would have any detrimental impact on amenity or public safety and as such should be capable of being granted consent subject to appropriate conditions to control the operation of the advertisement.

Application Submission

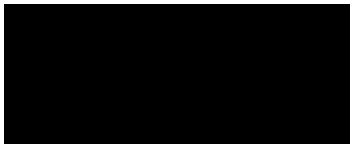
In order to complete the application, please find attached the following documentation:

- Completed application forms
- Letter Statement (this letter);
- Highway Safety Report;
- Architectural drawings including;
 - FS684/PA/01 Site Location Plan
 - FS684/PA/02 Existing Site Plan
 - FS684/PA/03 Proposed Site Plan
 - FS684/PA/04 Proposed Site Plan
 - FS684/PA/05 Existing and Proposed Elevations
 - FS684/PA/06 Existing and Proposed Elevations
 - FS684/PA/07 Specification
 - FS684/PA/08 CGIs

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

Yours faithfully

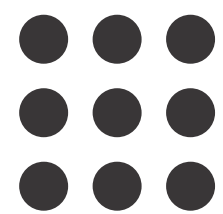


Amon Yiu
Senior Planner

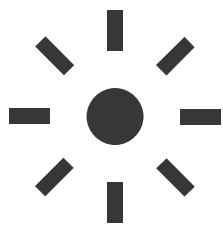
E: amon.yiu@carterjonas.co.uk
M: 07799 772358

APPENDIX 1 – D-POSTER COMPARISON

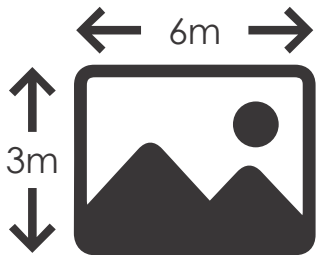
D-POSTER



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

Liz Rygh
Liz Rygh: Magnificent by the Book
(H. Martin, 2020)
London College of Communication
B&W.com
B&W...

Illustrated by the author of 2020
in partnership with Clear Channel
Illustration

Clear Channel

Daytime Overcast



Twilight



Pitchford Steelstock
Tel: 01384 489030

Tomorrow
begins **Today.**

40

TOL
Hire

TALENT

Every day at home
is making a difference

Clear Channel

Dusk



Night

APPENDIX 3 – MODEL CONDITIONS IN TECHNICAL NOTE 5 “THE BRIGHTNESS OF ILLUMINATED ADVERTISEMENTS INCLUDING DIGITAL DISPLAYS” (PLG05/23)

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:
 - FS684/PA/01 Site Location Plan
 - FS684/PA/02 Existing Site Plan
 - FS684/PA/03 Proposed Site Plan
 - FS684/PA/04 Proposed Site Plan
 - FS684/PA/05 Existing and Proposed Elevations
 - FS684/PA/06 Existing and Proposed Elevations
 - FS684/PA/07 Specification
 - FS684/PA/08 CGIs

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 nighttime 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 4

Application for Advertisement Consent: Proposal Factsheet

URN: FS684Site Name: Arundel Road, Worthing, BN13 3EHPlanning Portal Reference: PP-14970987

Advertising Type	<i>Digital</i>
Size of Advertisement (HxWxD)	<i>1.23m(w) x 2.4m(h) x 0.22m(d)</i>
Number of Panel	<i>2</i>
Max Daytime Illumination <i>(to be adjusted based on application)</i>	<i>Up to 5,000 cd/sqm (Brightness will vary during daylight hours based on ambient brightness (ie brighter on a cloudless summer's day than overcast winter's day)</i>
Max Night-time Illumination <i>(to be adjusted based on application)</i>	<i>300cd/sqm</i>
Notes	<i>Brightness adjusted by a light sensor backed by a light table</i>