

Supporting Statement

Application of consent to display advertisement(s):

North elevation of 22 South Farm Road, Worthing, BN14 7AA

On Behalf Of:

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Introduction

This cover letter accompanies the planning application for the proposed digital LED billboard (D-poster) to the side elevation of the rear projecting element of the building facing towards the railway line of No. 22 South Farm Road, Worthing, BN14 7AA. It outlines the proposed upgrade to an established paper and paste advertising display to a 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 advertising display on a like-for-like basis, using new display technology that is lightweight, durable, efficient, and can be easily erected. It has been designed to be a similar size and scale to the existing unit.

Proposal

The proposal seeks permission to replace the existing display on the north elevation of 22 South Farm Road, Worthing with a new digital LED equivalent. The D-poster will measure 8200mm x 2880mm, and the overall dimensions including housing will be 8400mm x 3080mm. It will display static content only, changing no more frequently than once every ten seconds.

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. To minimise environmental impact and maintain amenity levels, the screen will include ambient light sensors and automatic brightness controls. At night, the D-poster illumination will be deactivated resulting in zero illumination (the applicant is open to discussion regarding the hours where luminance is set to zero). When the D-poster is active the illumination of the sign will automatically adjust to the ambient light levels around – when the ambient lighting levels are higher (sunny days), the screen will adjust brightness accordingly so that it continues to be visible and mimic the appearance of a paper-poster hoarding (see figure 1 & 2).



Figure 1

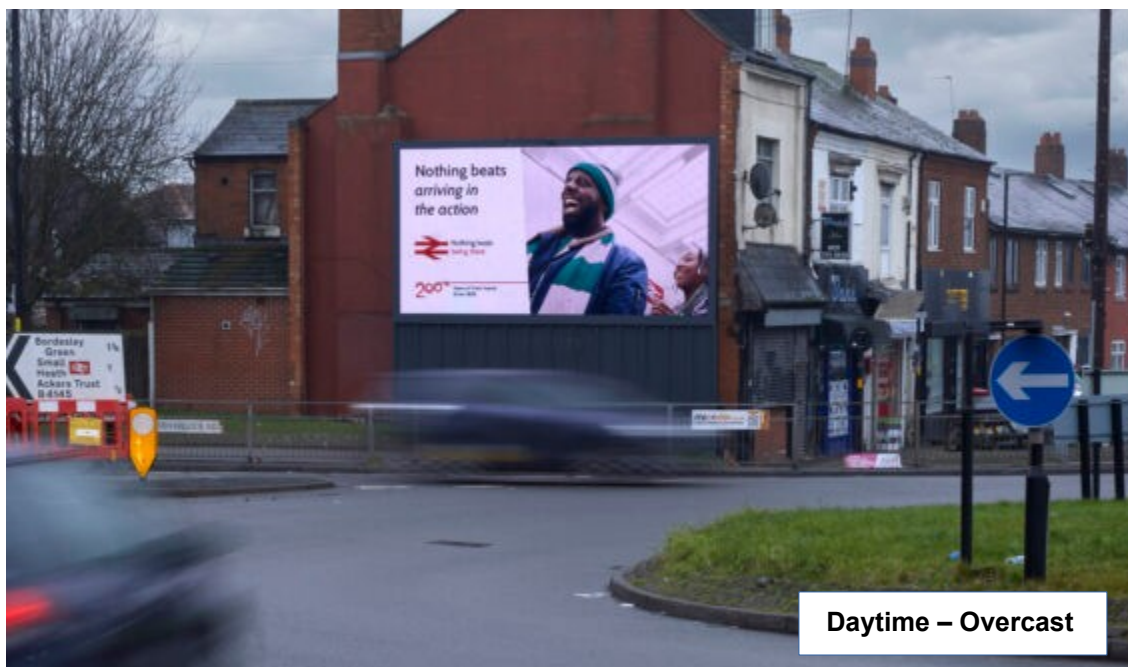


Figure 2

The proposed D-board will be a back-lit screen. Luminance will be controlled to be in line with the ILP guidelines. The D-board will have no special effects, animation or movement, which would increase its visual prominence within the local area. The sign will be capable of changing to display new adverts every ten seconds, which is in accordance with industry standards.

Public and Environmental Benefits

The upgrade will provide multiple operational and environmental advantages:

- Significant reduction in servicing trips, cutting carbon emissions
- Elimination of paper and plastic waste used in printed posters
- Capability to broadcast emergency or public health messaging
- Use of unsold slots for non-commercial or community content
- Greater opportunity for relevant and timely local advertising
- These measures support both sustainability goals and modern public engagement strategies.

We welcome the council to place community information on the screens for up to 10% of each hour.

Site Context

The advertisement is sited on the to the side elevation of the rear projecting element of the building facing towards the railway line. The surroundings consist of commercial premises and residential properties located at an oblique angle to the screen. The surrounding location of the site features multiple billboard signage with the site currently an established advertising location having hosted billboard signage for a number of years (see figure 3).



Figure 3

The character of South Farm Road is defined by its active railway line, lit public realm, and surrounding commercial activity — providing an appropriate setting for a modestly illuminated advertisement display during pre-defined hours.

The site will be viewed in the context of the railway line, the main road, an existing billboard (No.19 South Farm Road to the west - fixed to its north elevation), multiple billboards facing onto South Farm Road, neighbouring residential dwellings on Cross Street, and the numerous mixed-use buildings with ground floor commercial units, which feature a variety of different illuminated and non-illuminated signage. The north elevation of No. 22 South Farm Road is able to accommodate an advertisement of the proposed size, as it does at present. Given this, the proposed D-poster will be appropriate and in keeping with the general character of the area — that of a lit, mixed-use environment, with pre-established billboards (see figure 4,5,6 & 7).



Figure 4 – Existing Street Scene - Day



Figure 5 – Existing Street Scene - Day



Figure 6 – Existing Street Scene - Dusk



Figure 7 – Existing Street Scene - Night

Given the above, the proposal will not materially impact the amenity of the area.

Planning History

1. AWDM/0883/25 Refusal - 27 Nov 2025

Display of digital LED billboard sign

2. AWDM/1723/19 Permitted - 14 Jan 2020

Advertisement Consent for 1no. non-illuminated advertisement panel (64 sheet)

Reasons for Previous Refusal

These reasons were defined on the decision notice, and we have taken these as a starting point to address in a more positive way in any re-design and re-submission we have noted the objectives in red.

01. The proposed digital LED billboard sign which would display multiple static advertisements on rotation would, by reason of its size, design, positioning, location, and illumination, represent an unduly prominent and discordant form of advertisement out of keeping with the character and appearance of the building,

the residential setting, and wider streetscene. As such the proposal is contrary to policies DM5 and DM6 of the Worthing Local Plan and the relevant paragraphs of the National Planning Policy Framework.

- Re-submission Objective 1
Develop a new design that is suitable in terms of size and in accordance with what is already existing.
- Re-submission Objective 2
Develop a new design that integrates better with, the character and appearance of the building, the residential setting, and wider streetscene.
- Re-submission Objective 3
Develop a new approach that reduces illumination.

Proposed New Design Concept Strategy

The new concept is to:

1. Maintain a similar size and form of the existing paper and paste billboard and not exceed an offset of 150mm from the face of the building (in alignment with what was stipulated within permitted application AWDM/1723/19)

The following is stated within the Development Management – Delegated Officer Report in relation to AWDM/0883/25 Refusal - 27 Nov 2025:

“Though the proposed billboard would be large, it would be similar in area to the existing poster board that it would replace, and also framed within the cornice detailing. However, it would have a greater depth, protruding further from the building façade when compared with the existing board which does not protrude beyond the cornice despite the drawings indicating otherwise, and its positioning on the building and depth would result in an unsympathetic and more dominant appearance.”

It is noted that application AWDM/1723/19 was permitted on the basis of a 150mm maximum projection of the advertisement from face of building. The proposed new design will therefore not exceed that previously approved maximum offset. It is also noted that this offset is significantly less than that of

the projection of other advertisements from the face of the building on Cross Street (see figure 8), which protrudes significantly beyond the cornice.



Figure 8

2. Utilise light sensors to mimic the appearance of a traditional paper and paste billboard by reducing illumination in low light (overcast) settings.
3. Borders will be finished in a dark blue to tie in with the finishes used on the building.
4. Reduce illumination by limited it to set hours.

The following is stated within the Development Management – Delegated Officer Report in relation to AWDM/0883/25 Refusal - 27 Nov 2025:

“The illumination would be as specified above and has been amended to a maximum level of illumination of 200 cd/m² which would be within the recommended levels stipulated by the Institute of Lighting Engineers for zone E3 for an advertisement of this size and would limit the impact on outlook for

neighbouring occupiers given that they would not directly overlook the billboard and dwellings to the north are more remote from the site.

However, as the illumination would be responsive to changes in light levels, its effect during darker hours would increase visibility and exacerbate the harm to visual amenity that would arise.”

To address its effect during darker hours and avoid increased visibility and harm to visual amenity the D-poster illumination will be deactivated at night (the applicant is open to discussion regarding the hours where luminance is set to zero).

See figure 9,10 & 11.



Figure 9 – Proposed Street Scene – Day (low light)



Figure 10 – Proposed Street Scene – Dusk



Figure 11 – Proposed Street Scene - Night

Technical Controls and Compliance

The following measures will ensure the proposal does not adversely affect public amenity or safety:

- Static images only – no animation, flashing, swiping, fading, or merging
- Image changes limited to a frequency of once every ten seconds
- Night-time brightness – D-poster will be deactivated resulting in no illumination during set hours (to be determined through discussions with LPA)
- Remote monitoring and diagnostics to allow immediate fault response
- No impact on sight lines, visibility splays, or road user safety
- 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 (or any subsequent amendment/replacement to this guidance).

These conditions reflect best practice standards now commonly accepted for roadside digital displays. Where circumstances demand, additional controls or variations of these conditions may be acceptable to the applicant.

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 development plan for the area consists of the The Local Plan 2020-2036 (Adopted 28th March 2023). Policy SM6-Public Realm (criterion e) states that:

e) Express consent will only be granted for advertisements which respect the

character and appearance of the surrounding area, and do not create a danger or hazard to public safety.

Planning Considerations

The impact of the proposed replacement D-Poster sign has been considered in amenity and public safety terms as follows:

Amenity

The proposal seeks to replicate the existing advert and therefore mimic the existing situation, there will be minimal impact on the visual amenity of the surroundings. The size, scale and position of the advertisement will remain the similar 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 can be set to zero, with the applicant being open to discussion regarding these hours. This will ensure that the proposed display does not cause any material harm to amenity. The context of the surroundings, including mixed units, residential units, existing street lights, illuminated shop signage and level crossing signals to the front of the site establishes the site as appropriate for a modestly illuminated advert of this type with the appropriate controls in place. Additional controls over the display, beyond what has been stipulated, will be considered if necessary, to remedy a specific amenity concern. 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, or within proximity of any local heritage assets.

The character of this section of South Farm Road is mixed use, surrounded by a number of ground floor commercial retail units displaying a variety of different advertisements, including that of the host building (Open House Estate Agents). The character of Cross Street, for which the north elevation of the host building fronts onto, and is the location of the existing and the proposed advertisement, is a narrow road accessing Worthing Station. It features residential buildings with the host mixed-use building on one side and the railway line on the other. The only residential properties with views to the site from habitable rooms are dwellings located approximately 45 metres away to the north.

However, the windows to the habitable rooms are at an oblique angle to the site and at this distance would not be materially affected by the proposal.

South Farm Road is a busy, lit road, with a high level of activity during the day and evening. The D-poster will relate well to the commercial area and busy road and will therefore not appear incongruous.

When assessing local amenity, the National Planning Practice Guidance (PPG) at paragraph 079 outlines that local planning authorities should always consider the local characteristics of the neighbourhood and whether the advert is in scale and in keeping with these features. The PPG advises that (for example) poster hoardings will be refused where it would dominate a group of listed buildings, but they would be permitted in an industrial or commercial area of a major city (where there are large buildings and main highways) where the advertisement would not adversely affect the visual amenity of the neighbourhood of the site.

The illumination of the sign will automatically adjust to the ambient light levels around – when the ambient lighting levels are higher (sunny days), the screen will adjust brightness accordingly so that it continues to be visible and mimic the appearance of a paper-poster hoarding. The proposed D-poster will be a back-lit screen and the level of night-time luminance will be zero (the applicant is open to discussion regarding the hours where luminance is set to zero). The D-Poster will have no special effects, animation or movement which would increase its visual prominence within the local area. The sign will be capable of changing to display new adverts every ten seconds which is in accordance with industry-standards.

The site will be viewed in the context of the South Farm Road, the adjacent level crossing, existing billboards, residential buildings, and the numerous mixed-used buildings which comprise a variety of different signage. The backdrop of the north elevation wall of No. 22 South Farm Road will be able to accommodate an advertisement of the size proposed, as it does at present. Given this, the proposed D-Poster will be appropriate and in keeping with the general character of the area, that of a lit mixed-used setting, and the proposed, subject to agreement on zero illumination during night-time hours, would integrate with the existing lighting character of this area.

Given the above, the proposal will not materially impact on the amenity of the 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 and risk to the operational railway.

The following is noted from the Development Management – Delegated Officer Report in relation to AWDM/0883/25 Refusal - 27 Nov 2025:

The factors relevant to public safety include such matters as the safety of persons using any highway, and or whether the display of the advertisement in question is likely to obscure or hinder the ready interpretation of any traffic sign.

Network Rail has requested that the applicant engages with their ASPRO team to ensure that the works can be completed without any risk to the operational railway and with informatives recommended.

In view of the location and illumination the Highway Authority have been consulted on the application and have referred to WSCC Standing Advice. In terms of the highway safety and distraction to motorists, although no specific response has been received from the Highway Authority in relation to these proposals, the LHA has previously provided advice and conditions in response to a similar application type in Dominion Road (AWDM/0206/21 refers). In that instance the Highway Authority did not consider that the illumination or rotation of advertisements would have an unacceptable impact on highway safety. The proposed advertisement is not located within the publicly maintainable highway and would be sited to avoid obstruction and would not exceed the recommended maximum levels of illumination.

In light of the advice given on AWDM/0206/21 impact on highway and public safety

could be suitably controlled by condition had the application been considered otherwise acceptable.

It is therefore noted in relation to public safety, and in relation to the application for which this supporting statements relates, that it would be considered acceptable that the impact on highway and public safety could be suitably controlled by condition.

Conclusion

The proposal will not change the size, position or orientation of the advertising display with any protrusion not exceeding that of the permitted AWDM/1723/19. 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 with the applicant open to discussion regarding night time hours where luminance is set to zero in order to address its effect during darker hours, as highlighted as a reason for refusal AWDM/0883/25.

The proposed is above the pedestrian eyeline and above ground level unlike those within the surrounding vicinity, notably advertisements located at the junction of Cross Street and Victoria Road (see figure 12) and at 67 Victoria Road (see figure 13).



Figure 12



Figure 13

The proposal brings the aforementioned benefits of a digital advertisement display over conventional paper and paste whilst still mimicking this look through ambient light sensors and automatic brightness controls.

The proposed D-Poster is an upgrade to the existing, within an established advertising location with circa 10 existing advertisement/billboards within the local area and can be viewed in context 5 of those (see figure 14). It is within a lit public realm, adjacent to an active railway line, and surrounding commercial activity and is an appropriate setting for a modestly illuminated advertisement display during pre-defined hours.



Figure 14

For these reasons and the positive benefits set out above, it is considered that the application should be granted consent.

Application Submission

To support the application, please find the following documentation:

- Completed application form
- This Supporting Statement
- Existing Drawings – Ref: HD154_Blue Billboard_100_Existing.pdf
- Proposed Drawings – Ref: HD154_Blue Billboard_101_Proposed.pdf

We trust the submitted materials are sufficient to validate the application. Please confirm registration in due course. Should you require any further clarification, do not hesitate to contact me directly.