

Our Ref: JR/93456

4 June 2025



Planning Department
Worthing Borough Council
Adur & Worthing Councils,
Portland House,
44 Richmond Road,
Worthing,
BN11 1HS

**WILDSTONE ESTATES LIMITED
ERECTION OF D48 DIGITAL DISPLAY
LAND NORTH OF A27, RED SQUARE RETAIL PARK, SOMPTING ROAD, WORTHING, BN14 9LA
PLANNING PORTAL REFERENCE: PP-14073291**

Dear Sir/Madam,

Please find enclosed an application for advertisement consent for the erection of a freestanding digital display to be placed at the above site. The site has been selected due to its suitability for 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 a 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 displays and developing new sites in better locations. The overall strategy is to reduce the numbers 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 nighttime.

As a landowner, Wildstone will always have a long-term involvement 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 landlord to all the major operators, Wildstone are 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 new freestanding internally illuminated digital sign (D-Poster). The proposed D-Poster will display multiple static advertisements on rotation. The proposed panel will have the same dimensions as a standard 48-sheet hoarding, measuring 6m(w) x 3m(h) x 0.1m (d) and will be positioned 2.5m above ground.

The proposed new display technology is lightweight, durable, efficient and can be easily erected with minimal engineering. 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 (i.e. six adverts per minute). The ability to carry multiple adverts will cater for the demand in this area and reduce the pressure for new locations.

The proposal is submitted as part of a nation-wide project to upgrade traditional advertising hoardings to a modern digital format, which will see an overall reduction in advertisements, as multiple advertising campaigns can be supported by 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 of time, 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 poster 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 gained consent for over 700 digital advertisements across the UK.

Classic & Digital Roadside 48 sheets: 2015-2022

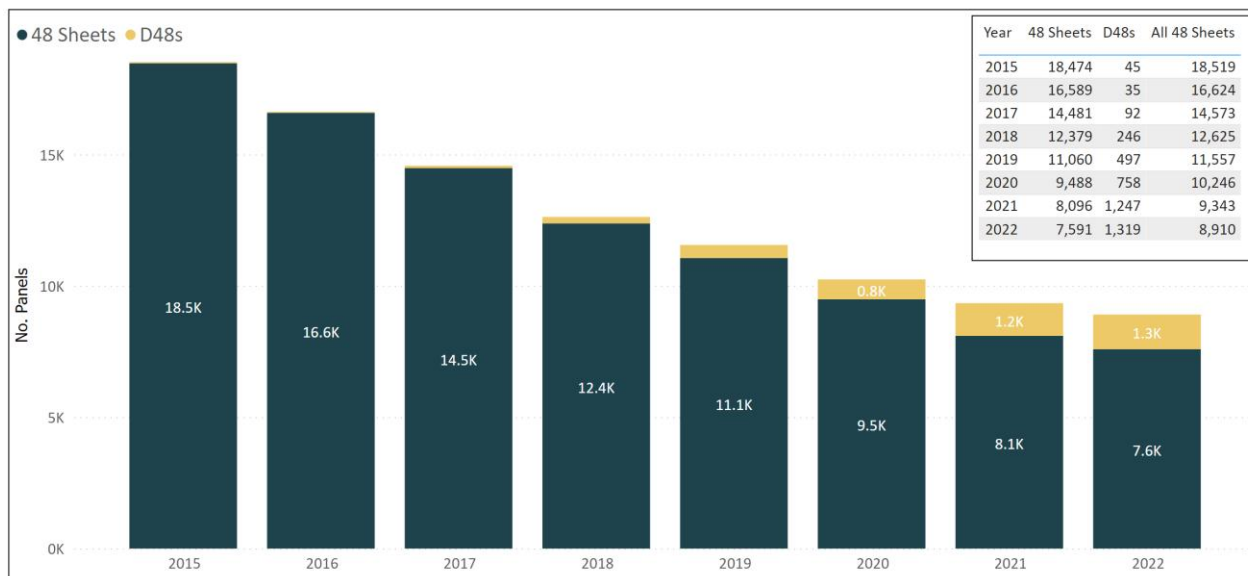


Figure 1 – Reduction in 48-sheet advertising 2015-2022

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 advertising consents now also operate within the 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, 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 guidance figure at nighttime, with lower thresholds set on more sensitive sites. Example sites operating during different times of the day are included at **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 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 have been used as the basis for the proposed conditions set out in **Appendix 3** of this statement.

The Site

The proposed digital advertisements will be located on land to the north of the A27, A 40mph dual-carriageway road, adjacent to the ScS Worthing sofa store. The proposed display would predominantly be viewed by eastbound road users on the A27 but is also visible to northbound road users on

Sompting Road. The site's surroundings are predominantly commercial with the adjacent sofa store to the north, restaurant to the northwest, and a row of ground floor commercial units to the southwest. To the south are residential properties off Downlands Gardens. The nearest dwelling with a view of the proposed display is 2 Downlands Gardens, approximately 35m to the south. No residential properties directly face the proposed display.

In accordance with the categorisations set out in the newly published ILP Guide PLG 05/23, the proposal would be classified as being within Environmental Zone 3 (Suburban). The site is not in proximity to any listed buildings or heritage assets and is not within a conservation area.

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, considering 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 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 local planning policy for the area consists of the Worthing Borough Council Local Plan 2020-2036, adopted March 2023. Policy DM6 – Public Realm states that advertisements can also form part of the public realm and need to be designed sensitively. Careful consideration needs to be given to the suitability (or not) of illumination and the positioning of advertisements with regards to preventing trip hazards and minimising 'clutter' within the public realm.

Planning Considerations

The proposal seeks to erect a new modern freestanding D-Poster on land to the north of the A27, Worthing, BN14 9LA. The proposed location is considered to be suitable in principle for advertising and the impact of the proposal has been considered in amenity and public safety terms as follows:

Amenity

The proposed advertisement will be located in a setback position from the nearby road. The proposed freestanding advertisement will appear the same as a traditional paper and paste display would owing to controls within the screens that allows for each display to be appropriately illuminated at all times. The illumination of the D-Poster will be controlled by sensors that gauge the ambient conditions which ensures that the poster is not appear overly bright. **Appendix 1** presents a side-by-side view of how a digital display appears with appropriate controls in place.

A recent appeal decision on a site in Manchester confirmed the agreement of the Inspector dealing with that case that "the quality of the static illuminated image which would be produced by the appeal

proposal would adequately mimic a traditional externally illuminated poster board so as not to present as an alien feature” (Appeal Ref: APP/B4215/Z/22/3303626: Land to the north of Thompson Street, M4 4BW).

The static street lighting along the A27 means that the site location is in a well-lit area. Therefore, the addition of the illumination from the D-poster will not appear to be out of place or cause any material adverse impacts on the amenity. The lighting levels information sheet (Appendix 2) submitted with this application showcases the appearance of a D-poster in different lighting conditions throughout the day.

The proposed display is not directly facing any dwellings. When viewed from the nearest residential property, 2 Downlands Gardens, it will be seen from a distance (35m) and in context with the well lit road and retail units. As such, it will not have a negative impact on the amenity enjoyed by the properties occupants.

In accordance with the categorisations set out in the newly published ILP Guide PLG 05/23, the maximum night-time luminance of the signs should be set at 300cd/m². During the night the illumination of the displays will be limited as mentioned above to ensure that the difference is minimised and acceptable within this urban environment. At night-time, the controls proposed over the level of luminance, as set out in **Appendix 3** will ensure that the proposal will not give rise to any material harm to amenity.

The proposal would not be detrimental in either an immediate or wider sense. It is not within a conservation area nor in close proximity to any listed building. The proposed advertisement will have no special effects, animation or movement that would increase its visual prominence and the nature of the illumination proposed means that light-spill from the signs will be minimised. Owing to the above, the new D-Poster will not negatively impact the amenity of the immediate 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. 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. Digital advertising is now a common feature in town centres and adjacent to major roads across the Country and there remains no causal evidence that they cause traffic collisions. Nevertheless, it is an accepted fact that advertisements are intended to attract attention. As such they are best located in situations where they do not conflict or confuse with other traffic signs or signals.

The advertisement will be seen by those travelling eastbound on the A27, and those travelling northbound on Sompting Road. The highways have appropriate speed controls in place to ensure that drivers are able to navigate the highway safely while maintaining appropriate stopping distances. The location of the proposed advertisement does not interfere with any sight lines or impede the ability of

motorists traveling on either road to register traffic signals when approaching the signal controlled junction.

The new D-Poster will operate within the conditions as set out in **Appendix 3**. Over the past decade, these industry standard conditions have been established to control the use of digital screens and minimise the potential for driver distraction. The poster will be statically illuminated at all times which ensures that drivers travelling on the highways will not be dazzled by the displays. The sensors in the poster allow for the illumination levels to adjust automatically to the ambient lighting conditions and thus will not appear as overly bright in a way that could distract drivers. Examples can be found in **Appendix 2** of how the advertisements will appear throughout the day.

The advertisement will transition instantly without any special effects to further minimize any negative impacts on highway safety. The 10 second duration for advertisements to be displayed is a well-established standard across the advertising industry and the D-Poster will present advertisements that are still images with no moving animations or videos. Drivers are highly unlikely to observe more than one image or transition between advertisements on the proposed D-Poster as such the images are not something to watch.

As such, the proposed internally illuminated displays would not constitute a hazardous distraction to anyone exercising a reasonable standard of care while driving on the adjacent highways. Consequently, the proposal would not give rise to public safety issues, which would prevent the granting of an 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 associated 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 benefits to development that will not be achieved by maintaining the status quo.

Conclusion

The proposal seeks to erect a new freestanding 48-sheet digital display on land to the north of the A27, Worthing, BN14 9LA. The proposed advertisement will be internally illuminated, and the display will be appropriately controlled so that it appears as a traditional paper and paste hoarding would.

The sensors in the poster will be able to adjust the brightness to match the ambient conditions throughout the daytime and the limited illumination level will ensure that the displays are not over illuminated during hours of day. The advertisement site is sufficiently distanced from any sensitive frontages.

The conditions put forward to control the luminance 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.

Application Submission

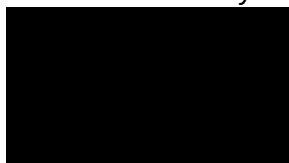
In order to complete the application, please find attached the following documentation:

- Completed application forms
- Letter statement (this letter)
- Appendix 1 – Side by Side Examples
- Appendix 2 – Lighting Conditions
- Appendix 3 – Model Conditions
- Architectural drawings including
 - 16283/PA/01 Site Location Plan
 - 16283/PA/02 Existing Site Plan
 - 16283/PA/03 Proposed Site Plan
 - 16283/PA/04 Existing and Proposed Elevations

Additionally, we will arrange payment 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



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Planner

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