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Dear Sir / Madam

331 BRIGHTON ROAD, WORTHING, WEST SUSSEX, WORTHING, BN11 2HP ERECTION OF A D6 SMALL FORMAT ADVERTISEMENT DISPLAY

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 proposal seeks to erect a single-sided freestanding D6 small format advertising display which will exhibit static advertisements on rotation. This is a standard small format advertisement, which is found across the UK in roadside, retail and transportation environments. There are over 75,000 6-sheets in the UK. The advertisement which is the subject of this application is primarily aimed at users of the PFS rather than road users.

The proposed D6 small format advertisement display has the same dimensions as a standard 6-sheet hoarding, measuring 1.23m(w) x 2.4m(h) x 0.22m(d). The proposed advertisement 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 display 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 display 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

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can turn the content to black. Engineers are able to respond within 24 hours to any issues which require attendance.

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 display 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** this statement for clarity.

The Site

The Site is a long-established site as a petrol station within the Built Up Area Boundary, on the approach to the designated Key Industrial Estates and Business Park at Meadow Road Industrial Estate to the northwest and the Medium Scale Local Centre along Ham Road to the west, where advertisements as proposed should be positioned.

The proposal site is located within the wholly commercial entity of the PFS and the D6 small format advertisement display will be positioned within the site boundary. The Site's immediate context and surroundings are a mix of residential and recreational in character, including a golf course and car parks.

The panel has 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 residential properties on the opposite side of Seamill Park Avenue.

The nearest residential properties are located at Seamill Park Avenue, which is approximately 30m to the west of the Site (at the closest point). However, the display does not overlook the properties, given the orientation/position of the proposed display and highways in between, and we therefore consider the proposal will have no impact on neighbours.

The Site does not contain or immediately adjoin a Conservation Area and heritage assets. The nearest heritage asset is the Grade II listed building at 205-211 Brighton Road, approximately 970m southwest of the Site. However, given the separation distance, the scale/position of the proposal display and highways/buildings/trees in-between, it is considered that the proposals will have no impact on the heritage asset.

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 small format advertisements in the locality including the approved consent for various signs including a small format digital panel at Connaught Theatre BN11 1LG (ref: AWDM/0729/210), which is approximately 2km west of the site and within a similar context. Another consented scheme is located at 35 Montague Street (ref: AWDM/0710/21), which is 2.3km southwest of the site and within a similar context.

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 4 (Urban).

The site is in a location where advertising of this type would typically be found.



Figure 2 – Google Street View image of the Site (June 2023)

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 2023 (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's Advertising Policy is included within Policy DM6 which follows the same approach as the Advertisement regulations in granting consent provided advertisements have an acceptable impact upon amenity or public safety.

Planning Considerations

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

Amenity

The site has been selected as an acceptable location for advertising in principle due to the commercial context. Within the adopted Development Plan, the Site is located within the Built Up Area Boundary, on the approach to the designated Key Industrial Estates and Business Park at Meadow Road Industrial Estate to the northwest and the Medium Scale Local Centre along Ham Road to the west, where advertisements as proposed should be positioned.

The site is a PFS and is a highly commercial site close to a local centre, situated on a busy road which is considered to be an appropriate location in principle for digital advertising. The advertisement 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. It would not appear out of place and will sit positively within the surrounding area and the existing character. The panel has also been positioned so as to minimise any impacts on the surrounding area directly facing the petrol forecourt and nearby residential properties.

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. It is not within a conservation area, attached or adjacent to a listed building, or within proximity of any local heritage assets.

The site is located within an urban area in which a brightness level of 300cd/sqm is considered acceptable during nighttime. The nearest residential windows are to the west of the panel and although they would not be impacted by the illuminance of the signage given the carefully positioned design, and the fact that the petrol station already operates 24 hours a day.

The context of the surroundings, including other illuminated (both internally or externally) display adverts, street lighting, and floodlighting at PFS and carparks. There are other consented advertisements in the vicinity of the Site including the approved consent for small format digital displays at Connaught Theatre BN11 1LG (ref: AWDM/0729/210) and 35 Montague Street (ref: AWDM/0710/21). The Officer Report confirms that the Site's location, scale, height, and format would have no impact on the visual amenity of the locality.

The proposed panel will upgrade and modernise the site in line with the long term aspirations to modernise the MFG PFS estate to meet customer requirements. It 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 southwest along Brighton Road, which is limited to 30mph, 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 and the proposed setback position from the boundary, drivers will be able to easily assimilate the information on the display.

The site is located within a highly commercial area, 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 entering or leaving the site or those traveling along Brighton Road.

Although the signs 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 panels 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 has been six accidents on the approach to the site in the past 5 years (all of which were clarified as 'slight' save for three 'serious'). However, given 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 a D6 small format digital advertising panel 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 display is 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 display fits 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 advertisement 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);
- Architectural drawings including;
  - FS609/PA/01 Site Location Plan
  - FS609/PA/02 Existing Site Plan
  - FS609/PA/03 Proposed Site Plan
  - FS609/PA/04 Proposed Site Plan
  - FS609/PA/05 Existing and Proposed Elevations
  - FS609/PA/06 Specification
  - FS609/PA/07 Existing and Proposed 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



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Graduate Planner

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APPENDIX 1 – D-POSTER COMPARISON

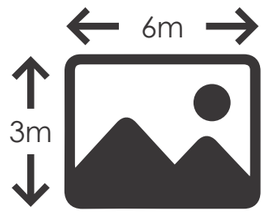
D-POSTER



D-Poster

Paper and Paste

High resolution LED display



Sized to match existing poster panels

Dimmable to 55 cd/m^2
Embedded ambient light sensors to control brightness

Reduced depth of 60mm compared to traditional digital panel (300-600mm)

Clear Channel

APPENDIX 2 – EXAMPLE SITES OPERATING IN ACCORDANCE WITH ILP GUIDANCE DURING DIFFERENT TIMES OF THE DAY



Daytime Clear Skies



Daytime Overcast


Every helps
TESCO
DOWNHILLS PARK ROAD
Clear Channel
Belmont Controlled ZONE
Wood Green Outer Controlled ZONE

Twilight


Pitchford Steelstock
Tel: 01384 489030
Tomorrow begins Today.
40
TOOL Hire
TALLBOAT

Dusk


prime video
THE RINGS OF POWER
NEW EPISODE FRIDAYS
EVIL
REVEALS
ITSELF
NUNNERY
DRIVE
2

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:
   - FS609/PA/01 Site Location Plan
   - FS609/PA/02 Existing Site Plan
   - FS609/PA/03 Proposed Site Plan
   - FS609/PA/04 Site Location Plan
   - FS609/PA/05 Existing and Proposed Elevations
   - FS609/PA/06 Specification
   - FS609/PA/07 Existing and Proposed 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: FS609

Site Name: 331 Brighton Road, Worthing, West Sussex, Worthing, BN11 2HP

Planning Portal Reference: PP-13365476

Advertising Type	*Digital*
Size of Advertisement (HxWxD)	*1.23m(w) x 2.4m(h) x 0.22m(d)*
Number of Panel	*1*
Max Daytime Illumination *(to be adjusted based on application)*	*Up to 5,000 cd/sqm (Brightness will vary during daylight hours based on ambient brightness (ie brighter on a cloudless summers day than overcast winters day)*
Max Night-time Illumination *(to be adjusted based on application)*	*300cd/sqm*
Notes	*Brightness adjusted by a light sensor backed by a light table*