

Dartford Borough Council
Planning Services

Via Planning Portal Only

9th December 2020

Our Ref: Dartford FC

Dear Sir/Madam,

Town & Country Planning (Control of Advertisements) Regulations 1992 (the “Regulations”) Land Adjacent to Dartford FC (the “Site”)

Please find enclosed an application for express consent under Regulation 9 of the Regulations for the installation of one freestanding digital 48-sheet (the “Screen”).

This application comprises the following documents and drawings:

- Express Consent Application Form
- Site Location Plan
- Site Plan
- Site Photos
- Crash Map Data
- Site Annotations
- Application Locations

The Site is set on a small parcel of land to the east of the stadium entrance and adjacent to the gates. The Site is predominately of mixed commercial character being sited next to the Leigh Academy however there is a housing estate opposed the Site.

There are residential properties opposite the Site however the Screen would not be detrimental to the residential amenity due to the treeline in front of the houses, the angle of the Screen and the distance of the Screen to the houses (see Site Annotations). Any light pollution will also be eliminated by restricting the illuminance levels to 300 candela/square metres.

The Screen is intended to face the traffic heading eastbound on the A225 towards the Bluewater Shopping Centre. The Screen is single-sided and therefore will not face the westbound A225 traffic.

PLANNING HISTORY

There appears to be a precedent for recommending refusals (see Application Locations):

- 16/01580/ADV Display of internally illuminated 48-sheet hoarding sign 48-sheet digital display Land Adjacent 361 Princes Road Dartford Kent.
- This application was refused and appeal dismissed on the grounds of public safety. The site was located on a very busy road intersection with a history of road traffic accidents.
- 17/01629/ADV | Replacement of a 48-sheet advertising display with a 48-sheet internally illuminated sequential advertising display | Land Adjacent Milan Day Centre And Beaumont Court Westgate Road Dartford Kent.

This application was refused and appeal dismissed on the grounds of visual amenity. This site was one of mixed character.

PROPOSAL

The Screen will measure 3 metres in height by 6 metres in length. This is the industry standard dimensions of a digital 48 sheet.

The Screen will be supported by steel framework and a monopole. The framework and poles will be powder coated to ensure longevity and clean appearance.

The Screen and structure design will be minimalistic.

The Screen will display a range of identical static illuminated images. New images would materialise every 10 seconds with the interchange between each image virtually instantaneous. Advertisements would not contain any movement, animation or special effects.

The Screen would operate at up to 300 candela/sqm. Advertisements would therefore accord with the institute of Lighting Professionals best practice guidance; The Brightness of Illuminated Advertisements PLG05 2015.

The existing signage (see Site Annotations) will be removed and replaced with the Screen.

DIGITAL ADVERTISEMENTS

Paper and paste billboards are now an outdated medium. For several years digital billboards have been introduced as more practical and sustainable alternative. Examples of some of the benefits include: reduced energy consumption; easy recycling of component parts; and a vastly reduced number of maintenance visits to site. It is accurate to say that roadside digital signage is now commonplace on the road network.

In addition they have proved to be a very useful and valuable tool for public messaging and have been utilised by the police, Highways England and several local authorities to communicate important messages to the public. The club would offer the local authority and emergency services the opportunity to display their advertisements free of charge.

PRINCIPLES OF DEVELOPMENT

The revised National Planning Policy Framework states that poorly placed advertisements can have a negative impact on the appearance of the built and natural environment. Control over outdoor advertisements should be efficient, effective and simple in concept and operation. Only those advertisements which will clearly have an appreciable impact on a building or on their surroundings should be subject to the Local Planning Authority's detailed

assessment. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.

PUBLIC SAFETY

The proposed displays would be set back approximately 26 metres from the A225.

Having regard to the Planning Practice Guidance. The Site is not considered an area where advertisements are more likely to affect public safety on the roads for the following reasons:

- This section of highway presents no unusual complexities (the traffic signals are addressed below). As such there is no increased cognitive demand from drivers.
- The Screen is 26 metres (approx) from the eastbound lanes of the A225 and as such would not be overly prominent in driver's sightlines when using the road or approaching the traffic signals.
- The Screen will present static adverts only with the sequential changes of adverts being virtually instantaneous.
- This stretch of road is straight providing good forward visibility. Drivers would therefore be able to glance at advertisements over a moderate distance without losing sight of the road or being distracted from traffic movements ahead. There is no increased demand on a driver's concentration or any requirement to take extra care when manoeuvring along this stretch of road. Drivers need only maintain simple lane, stopping distances, and an awareness of nearby traffic movements.
- The crash data shows that in the past 5 years there has been 3 minor accidents on this stretch of the eastbound A225 the last of which was on 07/02/2017(see Crash Map Data).
- The Screen of the size and form proposed are commonly experienced on the highways network. Consequently having regard to the Planning Practice Guidance they are not of an "unusual nature" and as such are unlikely to distract road users.
- The Screen is within the vicinity of traffic signals, although as mentioned above the A225 is a straight road with good visibility, the speed limit is 40 mph and Screen is approximately 15 metres away from the eastbound lanes of the A225.

It should be noted that despite extensive research having been conducted, there is no empirical evidence to suggest that roadside digital screens increase the potential for accidents and/or reduce the safety in the areas in which they are present. Therefore, it can be said that the risk is more perceived than actual especially given the prominence of digital screens on the highway network.

Under these circumstances, it is considered that the presentation of strictly controlled and minimally illuminated static images, would not constitute a potentially hazardous distraction to anyone exercising a reasonable standard of highway care. Consequently, it is considered that the proposed Screen would not unduly distract drivers or give rise to safety issues.

AMENITY

The Site is set on a small parcel of land to the east of the stadium entrance and adjacent to the gates. The Site is of mixed commercial character being sited next to the Leigh Academy but the area can be said to be of mixed character as it is opposite a housing estate.

The locality is an appropriate setting for advertisement displays of the scale and design proposed for the following reasons:

- Planning guidance states that proposed displays may create visual clutter by reason of the number of panels proposed or may create clutter by reason of an addition or increase in size of any existing displays, and so may not normally be acceptable. The opposite is the case with the Site.
- There are no existing roadside developments within the vicinity.
- The Site does not fall within a conservation area or an area of special advertisement control, and there are no listed buildings in the locality that would be harmed by the proposal. The Applicant Site is not in an area of any feature of historic, architectural, cultural, or similar interest.
- The size of the Screen (3m x 6m) is in keeping with the industry standard sizing for a 48 sheet. This size is regularly considered acceptable to planning authorities across the UK.
- The Screen will be significantly set back 26m from the eastbound lane of the A225 and 54m from the nearest house
- The displays would be illuminated to levels in accordance with accepted best practice guidance (300 candelas/square metres) . It would not be viewed by any sensitive receptors and would be subject to conditions limiting its brightness. Therefore, it is considered, illumination of the screens would not prove detrimental to residents.
- It will not be overly prominent or visible. Given the number of tall trees in the vicinity and the dominance of the Leigh Academy the Screen will not break the skyline or appear more prominent as it might on open land. The Screen would therefore be of a scale and design that is sympathetic to the locality.

Accordingly, given the setting is roadside in character, it is considered that the Screen would sit comfortably in its visual context without harming amenity, the qualities of the Site or the character and appearance of the wider area.

CONCLUSIONS

To ensure the Screen operates without harming either amenity or public safety, the applicant has included the schedule of planning conditions attached to this letter (see Appendix 1). They reflect best practice guidance and recent decisions issued by planning authorities across the UK.

It is not considered that the nature and scale of the Screen proposed at this Site would in its own right have a significant or material adverse impact or a cumulative impact to the

detriment of the visual amenity of the site or its surroundings area. The application is therefore considered to be acceptable in terms of amenity and public safety.

Yours Faithfully,

My Club Europe
Planning Services

Appendix 1

Schedule of planning conditions

1. The minimum display time for each advertisement shall be 10 seconds, the use of moving images or message sequencing for the same product is prohibited.
2. The interval between successive displays shall be instantaneous (0.1 seconds or less), the complete screen shall change, there shall be no visual effects (including fading, swiping or other animated transition methods) between successive displays and the display will include a mechanism to freeze the image in the event of a malfunction.
3. The advertisement hereby approved shall operate at an illumination level no greater than 300cd/m at any time.
4. The advertisements shall not include features/equipment which would allow interactive messages/advertisements to be displayed.
5. All advertisements displayed on this sign shall be static with no special effects (including noise, smell, smoke, animation, flashing, scrolling, three dimensional, intermittent or video elements) of any kind during the time that any message is displayed.