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Inverclyde Council
Development Management
Regeneration and Planning
Municipal Buildings
Clyde Square
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PA15 1LY

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22/219 – KH/JM
VIA EPLANNING

Dear Sir / Madam,

LAND AT GLASGOW ROAD, PORT GLASGOW, PA14 6SA

APPLICATION FOR ADVERTISEMENT CONSENT

EPLANNING REFERENCE: 100651213-001

On behalf of our client, Wildstone Securities Limited, please find enclosed an application for advertisement consent for the upgrade of an existing advertising site to provide two modern digital adverts capable of being operated from a central location without the need to visit the site individually.

This 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 displays and developing new sites in better locations. The overall strategy is to reduce the numbers of displays whilst increasing their quality.

a. The Applicant

Wildstone Securities 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.

This specialist landlord-tenant dynamic is symbolic of the maturity of the outdoor advertising sector as it becomes a legitimate property class attracting new investment and innovation. As the largest owner of advertising assets in the Country and landlord to all of the major operators, Wildstone are in a strong position to be able to push best practice and to change the perception of digital out of home (DOOH) advertising.

It is imperative, as part of this process, that there is confidence that digital displays can be appropriately controlled, and that there is a responsible party ensuring that conditions agreed at planning stage are met. Wildstone perform this function as they have a long-term investment in the sites regardless of who the tenant is.

Through partnership with the media operators as tenants, our in-house specialists, and screen maintenance and monitoring contractors, new systems of control have been established to help manage the operation of the displays. Content is controlled remotely in real time from a Networks Operation Centre (NOC) and the sites are monitored remotely 24/7 to facilitate responsive maintenance. Diagnostics software reports any faults back to the NOC and a kill switch turns the content to black until it can be resolved.

Wildstone has also invested in hardware through the development of the “D-Poster” which offers a high level of control over brightness, enabling it to mimic a traditional paper and poster billboard during the day and in the evening to ensure that it is muted and appropriately lit.

b. The Proposal

The proposal seeks to “repost” the existing displays on Glasgow Road with two 48-sheet “D-posters” which will display multiple static advertisements on rotation.

The proposal will involve the replacement of an existing set of advertising hoardings (3x 48-sheet). The 48-sheet hoardings are illuminated via top lights and are positioned to face onto Glasgow Road. Hoarding A occupies an approximate west-facing position (towards eastbound traffic), while Hoardings B & C occupy an approximate southeast-facing position (towards westbound traffic). All panels will be removed as part of the proposal and will be replaced with 2xD48-sheet adverts (Panels D and E).

While the existing hoardings are arranged in a triangular formation, Panels D and E will be positioned parallel to each other (i.e., back-to-back), and will occupy a position marginally closer to the carriageway of Glasgow Road. Please refer to the submitted architectural plans and elevations for additional detail.

The proposed panels have the same dimensions as a standard 48-sheet hoarding, measuring 6m(w) x 3m(h) x 0.06m (d) and positioned 2.00m above ground. The proposed new display technology is lightweight, durable, efficient and can be easily erected with minimal engineering. In most instances the re-posting of a D-Poster can be achieved at a similar speed to traditional posting, with minimal structural work. The quality of the image produced will mimic that of a traditional poster, as illustrated at **Appendix 1**. An example of a digital display operating in a similar environment is included at **Appendix 2**.

The proposed display will meet modern requirements and will be capable of displaying six advertising campaigns at a time, sequencing every ten seconds.

The proposal is submitted as part of a nation-wide project to upgrade traditional advertising hoardings to a modern digital format. It should be noted that this will see an overall reduction in adverts as multiple advertising campaigns can be supported by single panels. This will see the end of sites comprising a number of competing adverts all displaying different campaigns.

The statistics back this up (see Figure 1). At present, there are 1,319 digital 48-sheet advertisements in 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 over 700 consents have been granted for digital advertisements across the UK.

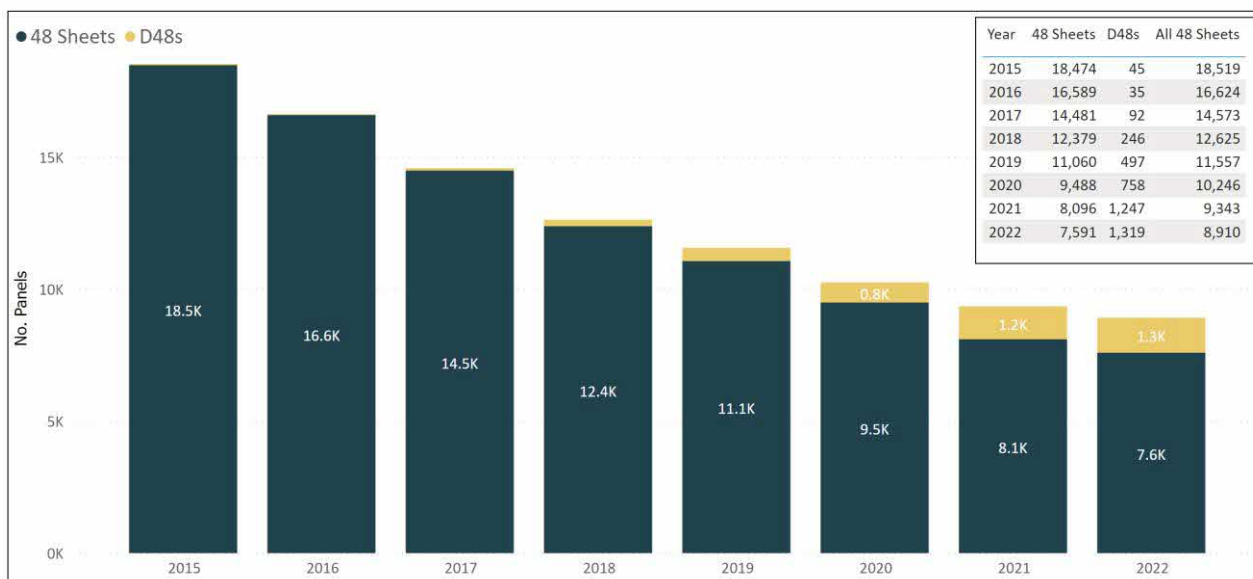


Figure 1 – Reduction in 48 sheet advertising 2015-2022

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.

c. 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:

- 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;
- Platforms to broadcast emergency messaging;
- Ability to use void periods for public messaging campaigns (i.e. Covid-19 Government messaging); 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.

d. Conditions

As described earlier, it is imperative that digital displays are appropriately controlled to ensure that they are acceptable in amenity and public safety terms. Outsmart, the advertising industry body (formerly the Outdoor Media Centre) has sought to self-regulate by introducing a code of practice that restricts the operation of digital displays adjacent to the highway to static images only, on a rotation of one advert every ten seconds, with a rapid change between images. The ILP Guidelines* have also been widely adopted as a means of controlling the night time luminance of advertisements. This industry standard forms the basis for conditions applied to the majority of digital advertisement consents.

In accordance with the current best practice approach, the D-Poster displays operate with a system of threshold controls, timers and light sensors to ensure that the luminance never exceeds the ILP guideline figure at night time, with lower thresholds set on more sensitive sites.

During the daytime the screen is able to adjust according to changes in the ambient light, ensuring that the brightness decreases in low light conditions. An example of a display operating in overcast conditions is included at **Appendix 3**.

Wildstone and Outsmart continue to work closely with the Institute of Lighting Professionals to establish best practice guidance on the use of digital displays at night time and during the day. In order to ensure that the nature of the advertisements will not cause any harm to amenity or public safety it is proposed to control their operation via model planning conditions as stipulated by the ILP in Professional Lighting Guide 05/23*.

The following conditions are proposed for this site:

1. 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.

2. In the hours of darkness, the advertisement display luminance shall be no greater than 300cd/m² in accordance with the recommended maximum night time luminance value set out for Environmental Zone 3 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 and in order to retain effective planning control.

3. 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.

* Institute of Lighting Professionals best practice guidance; *The Brightness of Illuminated Advertisements PLG05/23*

4. 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.

5. 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.

6. 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.

The above conditions are industry standard and are now commonly seen applied to applications of this type. Where circumstances demand, additional controls or variations of these conditions may be acceptable to the applicant. While the ILP guidelines will represent the upper limit, the actual level of illuminance in all likelihood will be well below this.

It should be noted that the appropriate level of illuminance for digital signage varies depending on the level of ambient light in the surroundings. The Lighting Environmental Zone for this site has been assessed as Zone 3 (E3), defined in Table 10.1 within the Institution of Lighting Professionals - Professional Lighting Guide (PLG 05) 'Brightness of Illuminated Advertisements including Digital Displays' as:

'Well inhabited rural and urban settlements, small town centres or suburban locations'.

For signs located within E3 zones, the Institution of Lighting Professionals (ILP) guidelines set a recommended night-time limit at which the display will not cause glare to drivers and will be appropriate within an urban or suburban character area. The maximum night-time limit in this case is 300cd/m².

The level of illuminance will be set on site manually to be at an appropriate level for the area and to mimic the poster previously located at this site. Whilst the ILP guidelines will represent the upper limit, the actual level of illuminance in all likelihood will be well below this.

The displays are capable of being dimmed within 1% of their maximum output and as such any concerns regarding levels of illuminance at a particular site can be dealt with swiftly and remotely. Lower levels of illuminance prolong the lifetime of the display and reduce electricity costs and as such there is an imperative to ensure that upgraded sites are not over illuminated.

e. The Site

The proposal site is located on Glasgow Road, Port Glasgow, Inverclyde and currently supports 3x 48-sheet adverts. The site's surroundings are largely urban in character, predominantly comprising areas of greenspace, transport infrastructure and housing. The site is bound to the north by the Inverclyde Railway Line and to the south by Glasgow Road. Glasgow Road provides a local vehicular connection between the Woodhall Roundabout and Port Glasgow, with the main arterial route (Greenock Road (A8)) lying approximately 85m north of the site. There is a pedestrian footbridge just

north of the site, which provides access over the railway line between Glasgow Road and Kelburn Terrace – the proposal would not affect access to the bridge as currently exists.

The site is also bound by extensive areas of woodland to the east and south, as well as a small area of publicly accessible greenspace to the west. According to the Scotland's Environment Map, there are no areas of ancient woodland within or adjacent to the site.

The nearest residential properties are located over 50m from the site to the north at Kelburn Terrace. However, the hoardings are obscured from view of these properties by areas of mature woodland and the Inverclyde Railway Line.

The site does not contain any listed buildings, nor is it within the vicinity of any heritage assets. There are no listed structures within 400m of the proposed signage. The existing signage is not located within or adjacent to a Conservation Area.

The site is an established advertisement location, with the existing adverts having been in situ since at least 2009. The principle of digital advertising at this location is therefore established, subject to an assessment against the relevant planning policy and impact on public safety and amenity.

f. Planning Policy

The legislative framework for the control of advertisements is contained within the Town and Country Planning (Control of Advertisements) (Scotland) Regulations 1984 (as amended), which states that only adverts that have an appreciable impact on buildings or their surroundings should be subject to detailed assessment. In such circumstances, advertisements should be subject to control only in the interests of amenity and public safety, taking into account cumulative impacts.

National Planning Framework (NPF) 4 was approved by the Scottish Parliament on 11th January 2023, before being formally adopted by Scottish Ministers on 13th February 2023. NPF4 is the national spatial strategy for Scotland and sets out the Scottish Government's spatial principles, regional priorities, national developments and national planning policy. NPF4's 'National Planning Policy' is presented under the three themes of Sustainable Places, Liveable Places and Productive Places.

Following its adoption, NPF4 supersedes both NPF3 and Scottish Planning Policy (SPP) (2014), as well as Strategic Development Plans (SDPs), which no longer form part of the Development Plan.

NPF4 Policy 24 (Digital infrastructure) states that proposals that incorporate appropriate, universal and future-proofed digital infrastructure will be supported. The context of this relates more broadly to telecommunications but remains applicable to this proposal.

The Development Plan for the area therefore comprises NPF4 and the Inverclyde Local Development Plan (LDP) (adopted 2019). Inverclyde Council is currently in the process of developing a new LDP which will replace the 2019 LDP. Although a draft has been published, the Proposed Local Development Plan (PLDP) has not yet been adopted. It is considered that the policies contained within the LDP will be most relevant in the determination of this local planning application.

Within the proposals map, the site does not have any specific allocation or designation and is located within the general urban area of Port Glasgow.

The Council does not have any specific policies in relation to advertising, however the Council has published Planning Application Advice Notes on the subject. Planning Application Advice Note No. 10 (Signage & Advertisements) states that signs and advertisements are an integral feature in towns and make an important contribution to the visual appearance of an area.

Specifically, the Note acknowledges that hoardings can make a positive contribution where used to screen visually prominent industrial and commercial sites, construction sites and vacant/derelict land. Except where applications will lead to a proliferation of hoardings along a street or within an area, proposals which bring about environmental improvement by screening commercial sites and vacant / derelict land will be supported.

The Town and Country Planning (Control of Advertisements) (Scotland) Regulations 1984 allows planning authorities to exercise control over the display of advertisements, but only in the interests of amenity and public safety.

g. Planning Considerations

The proposal will not cumulatively increase the number of adverts in the area and will see a reduction in the number of adverts on the site. The replacement of the three existing displays with adverts of identical scale and the control over their operation seeks to ensure that the change in the visual impact of the site on the surroundings is de-minimus and not material. Nevertheless, it is acknowledged by the Applicant that the change in the type of illumination and the potential to increase the rate of change of the adverts would require express advertisement consent. The impacts of these alterations have been considered in amenity and public safety terms as follows:

Amenity

As the proposal seeks to “repost” the existing adverts and therefore mimic the existing situation there will be minimal impact on visual amenity during the daytime. At night, the night-time illumination settings will ensure that the level of illumination is appropriate to the local area and is equivalent to a traditional internally illuminated advert.

There will be little material change to the outlook on Glasgow Road, as the level of illumination can be changed to suit local conditions and needs and to replicate the existing top lit advertisements. The displays would not amount to clutter or contribute to any cumulative impacts, sitting comfortably in the established visual context without harming visual or residential amenity, the qualities of the site, or the character or appearance of the wider area.

There is substantial screening between the location of the proposed hoardings and any nearby residential properties, with the hoardings positioned to face towards the approaching carriageways of Glasgow Road. It is not considered that there will be any impact on surrounding residential amenity from the proposed positioning of the adverts. The surrounding area cannot be considered primarily residential, due to the substantial areas of brownfield land, woodland, open space, industrial land and transport infrastructure which lie in close proximity to the application site.

The side-by-side comparison photograph on the D-Poster information sheet (**Appendix 1**) helps to illustrate the minimal difference between the existing type of displays and the proposed replacement once appropriate controls are put in place, which ensure that a digital advertisement is not over illuminated.

In this instance, the proposed hoardings will be positioned marginally closer to the carriageway than the existing paper and past hoardings. However, this is likely to have little material impact on residential amenity, as there are no residential dwellings within 150m of the proposed hoardings in either direction along Glasgow Road.

It should be noted that the hoardings currently provide an excellent form of screening for an area of disused land within the urban area. The land is not currently considered developable, due to previously discussed constraints such as the positioning of the railway line, Glasgow Road and a railway footbridge which sits just north of the site, connecting Glasgow Road with Kelburn Terrace. The

adverts can be considered a temporary solution to the site, until such a time that the site becomes suitable for more permanent development at a later date.

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.

Statistics demonstrate how commonplace and well-established digital displays have become across the country.

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 already 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. Should the Council's Roads 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. The road is single carriageway, relatively straight and illuminated by street lighting at this location. Road users would be fully capable of glancing far in advance of the site without being distracted from the road or traffic conditions. As such, drivers would be entirely capable of glancing at advertisements whilst maintaining stopping distances and an awareness of surrounding traffic movements. 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.

The existing advertisements have been in situ for over 13 years without any public safety concerns being raised. The introduction of a sequential change will not have a material impact on the level of distraction as the changeover will be instantaneous, in line with established best practice. The ability for the modern digital display to instantaneously change image reduces the eye dwell time and therefore minimises the potential for distraction.

The proposed positioning of the digital adverts – at approximately 90 degrees to the carriageway – ensures that the hoardings will be visible from a greater distance on approach to the site. The west-facing hoarding will become visible at a distance of over 250m on approach along Glasgow Road; the east-facing hoarding will become visible at a distance of approximately 240m in the opposite direction. This gives approaching drivers plenty of time to assimilate the displays within the wider streetscene.

According to Crashmap.co.uk there have been no accidents on approach to the site in the past five years, indicating a very safe stretch of road.

Under these circumstances, with the hoardings being such a familiar feature of the site and the surrounding road network, the proposed digital adverts would not constitute a hazardous distraction to anyone exercising a reasonable standard of care. Consequently, due to the established nature of the site for illuminated advertising hoardings, the proposal would not give rise to public safety issues, which would prevent the granting of an express advertisement consent.

As per the Town and Country Planning (Control of Advertisements) (Scotland) Regulations 1984 (as amended), in considering proposals for advertisement consent the planning authority should have

regard to the safety of road users or those likely to be affected by any such display and must consider whether any such display is likely to obscure or hinder the ready interpretation of any road traffic sign. The applicant has demonstrated above that the proposed digital adverts will have no materially greater impact on public safety than the existing panels on site, and it is therefore considered that proposal will have no detrimental impact on the public safety of road users.

h. Conclusion

The proposal will not enlarge the size or orientation of the existing adverts and will represent a reduction in the number of adverts on site. The position of the hoardings will be altered slightly, but it has been demonstrated that this change should be acceptable regarding impact on public safety and amenity. As such the established acceptability of the advertisements should not change materially.

The proposal would result in the erection of two 48-sheet digital adverts within an established site where advertising of this type is commonplace. The context of the immediate surroundings, including the present siting of illuminated advertising hoardings on the site for more than thirteen years, has established the site as appropriate for illuminated adverts of this type, and in this regard the proposal should be considered acceptable. Furthermore, the proposed conditions to control the luminance of the screens and the operation of the digital screens will ensure that there is no adverse impact on amenity or road safety.

The proposed signage fulfils the requirements of policies set out in the Inverclyde Local Development Plan within the context of the Town and Country Planning (Control of Advertisements) (Scotland) Regulations 1984 (as amended). For these reasons and the positive benefits set out, it is considered that the application should be granted consent.

i. Application Submission

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

- Completed application forms
- Letter Statement (this letter);
- Architectural drawings including;
 - *9556_PA_01 Location Plan*
 - *9556_PA_02 Existing Site Plan*
 - *9556_PA_03 Proposed Site Plan*
 - *9556_PA_04 Proposed Elevations_1*
 - *9556_PA_05 Proposed Elevations_2*

Additionally, we will arrange payment to Inverclyde Council for the sum of £300.00 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,


Kara Harrison
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