

Our Ref: SD/GM/93456

10 April 2024



Gedling Borough Council  
Civic Centre  
Arnot Hill Park  
Arnold  
Nottingham  
NG5 6LU

**WILDSTONE ESTATES LIMITED  
CONVERSION OF EXTERNALLY ILLUMINATED POSTER TO DIGITAL DISPLAY  
GOELAND HOUSE, 178 ST ALBANS ROAD, ARNOLD, NG5 6GW  
PORTAL REFERENCE: PP-12959676**

Dear Sirs/Madam,

Please find enclosed an application for advertisement consent for the conversion of an existing externally illuminated display hoarding to an internally illuminated digital display to be placed on the gable end of the above site. The site has hosted an externally illuminated display for a number of years which will be removed to allow for the installation of a modern digital poster, capable of being operated from a central location and significantly reducing vehicle trips for reposting.

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 night time.

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As landowner, Wildstone will always have a long-term investment 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 of 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 convert an existing externally illuminated hoarding with a modern internally illuminated digital advertisement (D-Poster) on the gable end of Goeland House on 178 St Albans Road which will display multiple static advertisements on rotation.

The site benefits from advertisement consent for a 48-sheet externally illuminated hoarding advertisement, ref: 2011/0983, approved in October 2011. The site has hosted the externally illuminated display since at least August 2012 (**Figure 2**), and has remained since.

The proposed panel has the same dimensions as the existing 48-sheet hoarding, measuring 6m(w) x 3m(h) x 0.1m (d) and will be positioned 6.1m above ground. The proposed poster will be of the same scale, position and orientation as the existing poster. 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. This will result in the consolidation of “multi-panel” sites into 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.

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**Classic & Digital Roadside 48 sheets: 2015-2022**

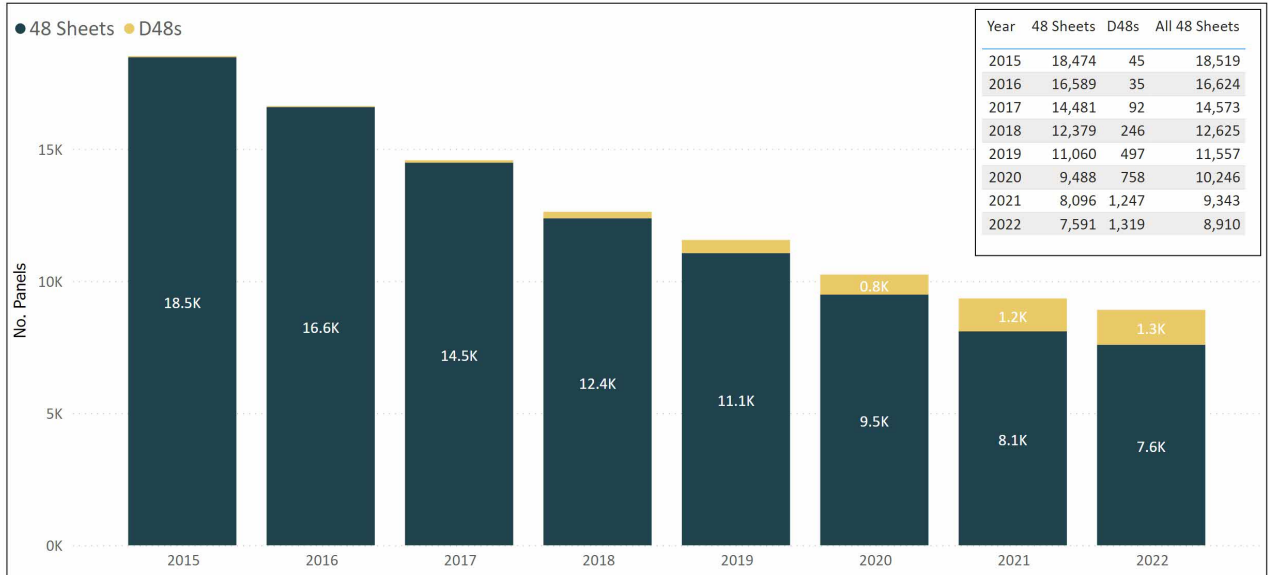


Figure 1 – Reduction in 48 sheet advertising 2015-2022

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. **Appendix 5** provides a concise summary table of the above proposal.

**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.

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 guideline figure at night time, 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.

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## The Site

The proposed advertisement will be placed on the gable end of a three storey building, Goeland House on 178 St. Albans Road. The building serves as a commercial space comprising a Jiu-Jitsu school on the ground floor, a home care agency as well as a hair salon on the upper floors.

The surroundings of the site include a car park to the north of the building to serve the commercial units. Beyond is a residential neighbourhood that extends around to the east and south of the site. To the west is car dealership and a Lidl supermarket, separated from the site by a traffic lighted road junction, A60, B6004 and Mansfield Road. A mixture of advertisements for the commercial uses can be seen in the surrounding area, some of which are of an illuminated nature.

Those travelling north and south on the adjacent roadway will have glimpsed views and those, who are travelling east on the B6004 are afforded full views of the advertisement site.

All sensitive frontages are sufficiently distanced from the site. 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 appropriately distanced from national and local heritage assets. It also not based within or in close proximity to a conservation area.

The site benefits from advertisement consent and currently maintains the approved externally illuminated poster space, which has been in place for almost 12 years, establishing the site as appropriate for an advertisement billboard. **Figure 2** shows the display in place on the site in August 2012. The same type of advertisement is still in place on the host building.



Figure 2: The site in August 2012, Source: Google Street View

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In 2019 a digital advertisement was approved to go on the gable end of 84 Victoria Road, that is a similar nature as the one is proposed as it was for an internally illuminated box capable of adjusting its illumination to match that of the ambient conditions.

## 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 Aligned Core Strategies: Part 1 Local Plan was adopted in September 2014. Policy 10 relates to design and development should make a positive contribution to the public realm and create safe and attractive environments.

Gedling Borough Council does not have any specific policies in relation to advertising.

## Planning Considerations

The proposal seeks to convert an existing externally illuminated hoarding with a new digital display on the gable end of Goeland House. Essentially, the proposal should be considered a replacement of the previous sign in terms of size, position and orientation, albeit going from an external source of illumination to being internally illuminated. The impact of the proposal has been considered in amenity and public safety terms as follows:

### Amenity

The proposed signage will be situated in an established location for an advertisement of this scale, with the current billboard benefiting from advertisement consent and being in place for over 11 years. In comparison to the current billboard that was in place on the site, the new poster will appear the same as a paper and paste display. However, the new D-Poster will be of a thinner and more modern design.

The illumination of the D-Poster is 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).

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The existing the advertisement has approval to be illuminated to a maximum of 600 cd/m<sup>2</sup> at all times. The proposed replacement poster will be able to adjust illumination as necessary throughout the day, owing to the sensors in the poster. These controls are entirely appropriate for the immediate setting unlike the existing illuminated panel, that has no control of over the illumination and remains at the same level at all times.

In accordance with the categorisations set out in the newly published ILP Guide PLG 05/23, the maximum night-time luminance of the display should be set at 300cd/m<sup>2</sup>, representing a significant benefit over the illuminated poster currently in place. During the night the illumination of the display will be limited as mentioned above to ensure that the difference is minimised and acceptable within this location.

Digital advertisements are commonly found in settings that are similar to the site for the proposed poster. **Appendix 4** showcases different examples of digital screens in comparable locations which further supports that the proposed advertisement is wholly appropriate to be situated on the gable end of the Goeland House. Additionally, the Officer's Report from when the existing advertisement was consented, they noted the following,

*“The commercial nature of the application building as well as the buildings on the opposite side of Mansfield Road from the application site, I am satisfied that the proposal would not result in any material impact on the visual amenity of site or wider locality.”*

Besides the addition of the Lidl supermarket, there have been very few changes to the wider surroundings. More importantly, the nature of the immediate area has seen little change since the existing poster was granted consent. Therefore, the impact on the visual amenity should be seen as the same as when the previous officer considered the existing panel, and the D-Poster should be considered to be entirely appropriate.

There are no heritage assets or conservation areas within a close proximity to the site. Owing to the proposal being for a replacement advertisement, the digital poster will not clutter the streetscene. As such, the D-Poster will not negatively affect 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. As the principle of an illuminated advertisement has already been established at this location, (the existing sign is externally illuminated), the Council should 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 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

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collisions. Nevertheless, it is an accepted fact that advertisements are intended to attract attention. As such they are best located in situations where demands on a driver are low and they do not conflict or confuse with other traffic signs or signals.

The proposed 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 controls in place on the digital advertisement ensures that drivers will not be dazzled by the display as it will be statically illuminated at all times. 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 will distract drivers, as displayed in **Appendix 2**.

The proposed display will be of the same size, position and orientation of the existing poster which ensures that sight lines will be maintained and visibility of traffic signage will not change. The sign will be primarily viewed by those who are travelling on east on B6004, which is a well-lit and level highway. The B6004 has appropriate measures in place to control traffic, ensuring that drivers are able to navigate the area with ease. The cognitive demand on road users at this point is minimal as there are no unusual highway complexities which would require extra care to be taken.

There will be glimpsed views of the proposed digital advertisement by those travelling south on Mansfield Road and B6004 and north by road users heading north on the A60, as there are with the existing illuminated sign. The speed limit the adjacent road network is 30mph, which means that drivers will already be practicing a standard level of caution while driving. As such drivers would be entirely capable of glancing at the advertisement whilst maintaining stopping distances and an awareness of surrounding traffic movements.

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. 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.

Owing to the above, the replacement digital screen would not constitute a hazardous distraction to anyone exercising a reasonable standard of care while driving on the adjacent highway. 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;

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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 replace an existing externally illuminated poster with a new digital advertisement. The proposal will be located in a mixed use area where an illuminated advertisement has already been deemed to be appropriate.

The position, scale and orientation of the advertisement will match that of the existing illuminated hoarding, albeit at a reduced depth and with modern sensors to ensure that the poster is appropriately illuminated throughout the day. The existing display on the site benefited from advertisement consent and now has deemed consent, by virtue of the length of time that it has been in place. The existing advertisement has been located on the gable end of Goeland House without issue.

The conditions put forward to control the luminance and the operation of the digital screen 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
- Appendix 4 – Gable End Examples
- Appendix 5 – Proposal Factsheet
- Architectural drawings including;
  - 22948/PA/01 Site Location Plan
  - 22948/PA/02 Existing Site Plan
  - 22948/PA/03 Proposed Site Plan
  - 22948/PA/04 Existing and Proposed Elevations

Additionally, we will arrange payment to the Gedling Borough 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.

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Yours faithfully,



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**Planner**

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