

Our Ref: JW/GM/93456

12 May 2023



Haringey Council London Borough
Planning, Regeneration & Economy
Level 6, River Park House
225 High Road
Wood Green
N22 8HQ

BY EMAIL ONLY

Dear Sir/Madam

**TOWN AND COUNTRY PLANNING (CONTROL OF ADVERTISEMENTS) (ENGLAND)
REGULATIONS 2007
CONVERSION OF POSTER ADVERTISEMENT TO D-POSTER
677a GREEN LANES, LONDON, N8 0QY**

On behalf of our client, Wildstone Estates Limited, please find enclosed an application for advertisement consent to upgrade a long established existing backlit 48-sheet sized poster and paste advertisement display to a modern digital format ('D-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 number 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.

This application comprises a resubmission of advertisement consent ref: HGY/2022/2665, approved by the Council on 9th November 2022 which approved the replacement of the existing backlit 48-sheet sized poster and paste advertisement display with a D-Poster. The application hereby submitted seeks a slight variation in the positioning of the proposed D-Poster on the site. The advertisement consent approved on the site in November 2022 has not yet been implemented as the applicant intends to carry out the works in accordance with the plans and details hereby submitted.

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

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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.

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 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 24/7 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 replace the existing 48-sheet sized freestanding backlit poster and paste board at 677a Green Lanes, London, N8 0QY ('the site') with a digital screen (D-Poster) which will display static advertisements on rotation.

The site currently comprises a north facing backlit 48-sheet sized poster and paste billboard. It is proposed to replace this with a 48-sheet sized internally illuminated D-Poster. The proposal represents a like for like swap with regard to size and scale of advertisement at the site in addition to the positioning of the advertisement within the site. The submitted existing and proposed site plans including elevations reflect the replacement of the existing backlit poster and paste board at the site with the new illuminated digital screen. The quality of the image produced will mimic that of a traditional poster board, with the overall aim of the project being to replace like for like with no associated adverse impacts.

The proposed D-Poster has the same dimensions as a standard 48-sheet hoarding, measuring 6m(w) x 3m(h) x 0.1m(d) and will be positioned 4.5m above ground (to the base of the panel). This is consistent in all regards to the existing 48-sheet poster and paste advertisement display on the site. The proposed new display technology is lightweight, durable, and efficient and can be easily erected with minimal engineering utilising the existing mounting structure on the site. The quality of the image produced will mimic that of a traditional poster and paste display as illustrated in the enclosed D-Poster Information Sheet (**Appendix 1**).

The proposed display will meet modern requirements and will be capable of displaying six 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 adverts, as multiple advertising campaigns can be supported by single panels. In some cases, 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

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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.

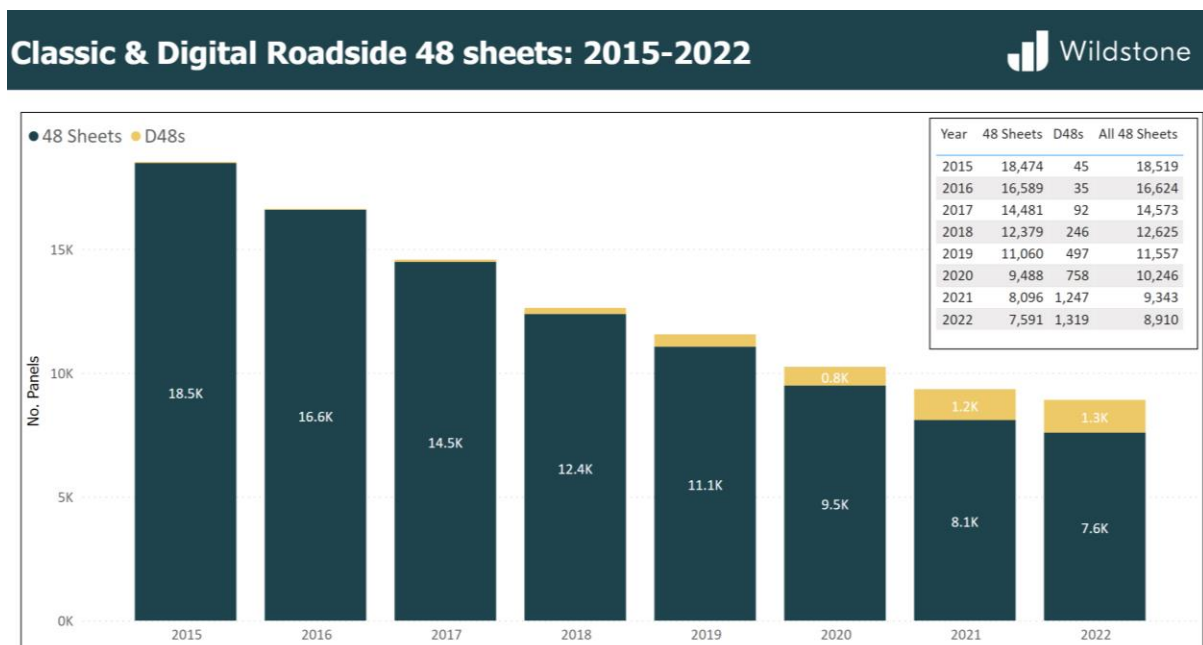


Figure 1: Reduction in 48-sheet advertising 2015-2022

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.

Planning History

The Council granted advertisement consent to replace the existing backlit 48-sheet sized poster and paste advertisement on the site with a D-Poster in November 2022 (LPA ref: HGY/2022/2665). This consent has not yet been implementing thereby the existing position remains the same. The only difference between the proposal hereby submitted and that approved pursuant to advertisement consent HGY/2022/2665 comprises the height of the D-Poster from the base of the display. The proposal is identical in all other regards. For reference, this difference is illustrated in the comparison in **Figure 2** showing the approved D-Poster elevation and the D-Poster elevation hereby proposed. The height of the D-Poster hereby proposed mirrors that of the existing backlit 48-sheet sizes poster and paste advertisement.

In this regard, it is noted that the site location plan, existing site plan and proposed site plan hereby submitted already comprise approved plans pursuant to advertisement consent HGY/2022/2665 on the site. The only difference relates to the existing and proposed elevations plan hereby submitted as set out in the table below.

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Approved plans pursuant to advertisement consent HGY/2022/2665	Plans hereby submitted with this application
15471-PA-01 Site Location Plan	15471-PA-01 Site Location Plan
15471-PA-02 Existing Site Plan	15471-PA-02 Existing Site Plan
15471-PA-03 Proposed Site Plan	15471-PA-03 Proposed Site Plan
15471-PA-04 Existing and Proposed Elevations	15471-PA-04 Rev A Existing and Proposed Elevations

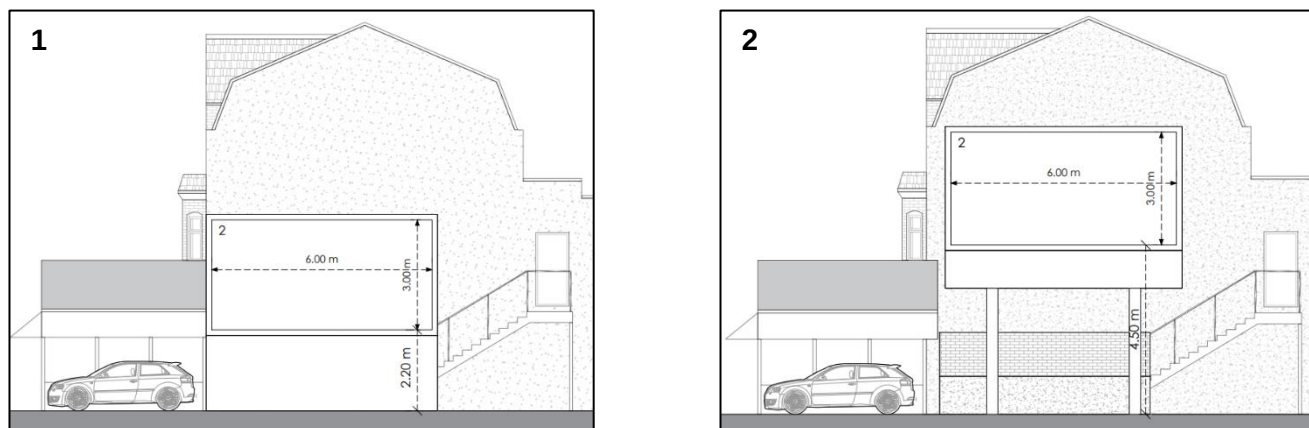


Figure 2: 1) Approved D-Poster Elevation (advertisement consent HGY/2022/2665) & 2) Alternative D-Poster Elevation Now Proposed

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.

It is highlighted that advertisement consent ref: HGY/2022/2665 approving a D-Poster on the site is subject to the conditions set out below. The operational restrictions are therefore established with the Council already determining that a D-Poster in this location is acceptable. It is considered that the application hereby submitted should be approved with the same operational restrictions secured to the consent.

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Conditions pursuant to advertisement consent HGY/2022/2665:

1. *Time Limit*
The development hereby authorised must be begun not later than the expiration of 3 years from the date of this permission, failing which the permission shall be of no effect.
2. *Approved Plans*
The approved plans comprise drawing Nos. 15471-PA-01, 15471-PA-02, 15471-PA-03, 15471-PA-04. The development shall be completed in accordance with the approved plans except where conditions attached to this planning permission indicate otherwise or where alternative details have been subsequently approved following an application for a non-material amendment.
3. *Brightness limit*
The maximum steady brightness of the illumination of the advertisement(s) shall not exceed 300 candelas per square metre during hours of darkness in accordance with Institute of Lighting Professionals best practice guidance.
4. *Not intermittent*
The illumination of the advertisement(s) shall not at any time be intermittent.

The Site

The proposal site constitutes land at 677a Green Lanes, London, N8 0QY. The proposal site currently supports one 48-sheet paper and paste advertisement billboard with internal backlighting illuminating the display. In the immediate context, the setting of the site comprises a mix of commercial/industrial/retail use and residential. The signage on the site faces north and is primarily visible to traffic travelling south along Green Lanes.

The proposal site is an established location for advertising, having demonstrably supported one 48-sheet billboard for over 11 years. Photographic evidence, using Google Streetview, confirms that the existing billboard has remained in place for over 10 years (since August 2011) which therefore benefits from deemed consent under Class 13 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

The street scene along Green Lanes is characterised by a plethora of signage commensurate with commercial/industrial/retail uses in the immediate vicinity, including the adjacent car dealership to the north and surrounding ground floor retail uses.

This sets out the position of the site and immediate vicinity in that it is an established area for illuminated signage. It is noted that the proposals seek to only upgrade and digitise an existing lawful billboard and would not further intensify the area in this regard. The proposals amount to variation from the existing backlit signage to the proposed internally illuminated D-Poster which shall display static adverts on rotation.

It is noted that the building to the north of the site at 677 Green Lanes constitutes a locally listed building (ref: Green Lanes N8).

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

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account provisions of the development plan, in so far as they are material, in addition to any other relevant factors.

The National Planning Policy Framework 2021 ('NPPF') sets out the Government's planning policies for England and how these are expected to be applied. In accordance with paragraph 136 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 '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 site falls within the local planning authority area of Haringey Council London Borough. In this regard, Policy DM3 (Public Realm) of the Council's Development Management DPD (July 2017) sets out that proposals for all advertisements should be designed to a high standard and, in particular, should:

- a) contribute to a safe and attractive environment;
- b) be of a high quality and sensitive to its visual appearance on the building on which it is to be sited and the surrounding street scene, especially in this case of listed buildings and conservation areas;
- c) avoid unsightly proliferation or clutter of signage in the vicinity;
- d) not cause a hazard to pedestrians or road users, including by siting and design;
- e) be sited to avoid visual intrusion of light pollution into adjoining residential properties; and
- f) where appropriate, be constructed of materials and finishes which discourage both graffiti and fly posting.

Policy DM9 sets out the local plan policy management of the historic environment. Development that conserves and enhances the significance of a heritage asset and its setting will be supported.

It is further noted that Policy D8 (Public Realm) of the London Plan sets out that with regard to lighting advertisements should be carefully considered and well-designed in order to minimise intrusive lighting infrastructure and reduce light pollution.

Planning Considerations

The proposal seeks to replace the existing backlit advertisement signage on the site like-for-like with regard to size, orientation and positioning/height. The proposed change to a D-Poster on the site with remote control over operations seeks to ensure that the change in the impact of the site on the surroundings is de-minimis. The impact of the proposed works is considered in amenity and public safety terms below.

It is noted that the fall-back position comprises the existing backlit 48-sheet poster and paste advertisement display (with no control over luminance). Moreover, the principle of a D-Poster on the site has been established by advertisement consent ref: HGY/2022/2665.

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Amenity

The proposal seeks to replace the existing advertisement billboard at the site with a D-Poster of the same size, positioning and orientation. The proposed works will see replacement of the backlit billboard on the site with a modern digital screen. As such, it is considered this will have no impact on visual amenity. The level of illumination of the proposed D-Poster will be set to ensure that the proposed advertisement is not visually materially different from the existing position with illumination associated with the signage on the site already established. Notwithstanding this, for reference the side-by-side comparison photograph on the enclosed D-Poster Information Sheet (**Appendix 1**) helps to illustrate the minimal difference between the existing type of display and the proposed replacement once appropriate controls are put in place, which ensure that a digital advertisement is not over illuminated.

During the day, the proposed level of illuminance will be set to mirror that of a traditional poster and paste board, consistent with the current position of the site. At night time, the controls proposed over the level of luminance along with the orientation of the D-Poster will ensure that the introduction of internally illuminated signage on the site does not cause material harm to amenity. It is noted that the backlighting luminance of the existing signage on the site can operate unrestricted. It is proposed that luminance of the D-Poster will be limited to 300cd/sqm during night time hours to ensure no negative impact to amenity in this regard and no unacceptable impact to any surrounding residential receptors. This is in accordance with the same operational restriction placed on advertisement consent HGY/2022/2665 on the site.

It is noted that street lighting lines Green Lanes, offering a further degree of illumination to the existing signage beyond backlighting of the signage itself. When considering the merits of the proposed digital advertisement board, it is important to note that should consent not be forthcoming, the fall-back position amounts to what already exists on the site which is not considered to be materially different to the proposed D-Poster. The principle of the proposed use (illuminated signage) is therefore already established and the current poster board would remain in situ should the proposed conversion to a D-Poster not be approved.

Consideration should therefore only be given to the replacement of the existing advertisement board and any impacts this would. Visually, it is considered that this will have no impact on the street scene nor any residential dwellings, thereby there will have no detrimental impact on amenity when compared to the current lawful position. The context of the site including the surrounding signage in the area establishes the site as appropriate for an illuminated advert of the type proposed.

Dwellings in closest proximity to the site are those to the north, currently under refurbishment at 677 Green Lanes. Notwithstanding the proximity to this building, the application site faces the gable wall of the building where no residential windows are present. There is therefore no risk of light spill into any residential property such that any adverse impact to amenity would be experienced. It is reiterated that the existing lawful position of the site comprises a backlit advertisement board, of the same size as the proposed D-Poster.

It is noted that 677 Green Lanes, opposite the site constitutes a locally listed heritage asset. In this context, it is considered that the significance and setting of the asset will be conserved owing to the extent of change proposed on the site. The proposals seek only to replace existing signage on the site which itself is a well-established feature. Sufficient control shall be in place to ensure the proposed D-Poster on the site will not have any adverse impacts.

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In allowing a proposal to replace an existing externally illuminated display with a D-Poster, a recent appeal decision on a site in Manchester confirmed the agreement of PINS 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 present as an alien feature”* (Appeal ref: APP/B4215/Z/22/3303626, Land to the north of Thompson Street, Manchester, M4 4BW).

Given the nature of the site and surrounding area and the presence of other signage in the immediate context, there would be little, if any, material change in the appearance of the street scene. The existing advertisement billboard at the site has been in place for over 11 years and constitutes a well-established feature of the street scene. The proposed replacement D-Poster would have no negative impact on the street scene when considered in this context, would cause no cumulative increase in advertisement signage and sit comfortably in the visual context while not harming amenity, the qualities of the site, or the character or appearance of the wider area. The proposed works will therefore have no unacceptable impact with regard to amenity. The associated impacts of the proposal are consistent in all regards when compared with advertisement consent HGY/2022/2665 which granted approval for a D-Poster on the site; thereby the proposal is acceptable.

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 a backlit 48 sheet advertisement billboard and a D-Poster has already been established at this location, the Council must only consider whether the proposed controls are sufficient to ensure that there is no additional distraction in relation to the proposed replacement D-Poster which would cause an unacceptable impact on public 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.

The proposed D-Poster would be seen primarily by traffic travelling south along Green Lanes which is well lit, straight, level and has excellent forward visibility. Road users would be fully capable of glancing content far in advance of the site without being distracted from the road or traffic conditions ahead and would be entirely capable of viewing advertisements whilst maintaining stopping distances and an awareness of surrounding traffic movements. This is identical to the current position with the existing backlit 48-sheet sized advertisement display on the site.

The proposal, which includes the introduction of a sequential change to adverts displayed, is considered to have no material impact on the level of distraction caused to any road users such that it would have the potential impact on highway safety. It should be noted that drivers are almost always continually assimilating sensory inputs from multiple sources whilst driving. It is not considered that the presence of the proposed D-Poster at the site would represent a material departure from the types of features that drivers are used to seeing at the roadside. The proposal would therefore not appear as an incongruous feature.

The introduction of a sequential change in the adverts will not have a material impact on the level of distraction as the changeover will be instantaneous and not more frequent than once every 10 seconds. This will reduce eye dwell time on the D-Poster and therefore the potential for a distraction is low. In this regard, free flowing traffic along Green Lanes will see most road users pass the sign without seeing a sequential advert change and in times of stop-start traffic, road users will be travelling very slowly or

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stationary at traffic lights. The introduction of a sequential advert change on the signage at the site is therefore considered to pose no increase in risk to highway safety.

Under these circumstances, such a familiar feature of Green Lanes and the surrounding highway network would not constitute a hazardous distraction to anyone exercising a reasonable standard of care. Consequently, the proposal would not give rise to public safety issues, which would prevent the granting of an express advertisement consent. The associated impacts of the proposal are consistent in all regards when compared with advertisement consent HGY/2022/2665 which granted approval for a D-Poster on the site; thereby the proposal is acceptable.

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 design;
- 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 associated with the proposal that will not be achieved by maintaining the status quo.

Conclusion

The existing backlit illuminated advertisement board on the site has demonstrably been in place for over 11 years and is a well-established feature of this part of the street scene along Green Lanes. The existing lawful advertisement signage on the site shall be retained in the event that consent is not granted for the proposed D-Poster.

The Council granted advertisement consent in November 2022 for the replacement of the existing advertisement display with a D-Poster (LPA ref: HGY/2022/2665) on the site establishing the principle for this. The application hereby submitted deviates slightly from the approved consent with regard to the height of the D-Poster.

The proposal constitutes a like-for-like replacement of advertisement signage on the site. The proposed internally illuminated D-Poster represents a change from the signage on the site being backlit to being internally illuminated along with the introduction of a sequential change.

The proposed conditions to control the luminance of the screen and the operation of the digital screen will ensure that there is no harm to amenity or public safety.

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For these reasons, when assessing the impacts of the proposed works with regard to amenity and public safety, it is considered the proposals are consistent with the extant lawful position and would not give rise to any unacceptable impact in both regards.

The associated impacts of the proposal are consistent in all regards when compared with advertisement consent HGY/2022/2665 which granted approval for a D-Poster on the site; thereby the proposal is acceptable.

For these reasons, and the positive benefits set out above, it is considered that the application should be granted advertisement consent.

Application Submission

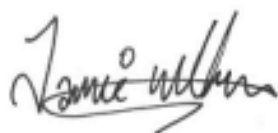
In order to complete the application, please find enclosed the following documentation:

- Completed application forms;
- Letter Statement (this letter);
- Appendix 1 – D-Poster Information Sheet
- Appendix 2 – D-Poster Example Sites
- Appendix 3 – Model Conditions
- Architectural drawings:
 - 15471/PA/01 Site Location Plan;
 - 15471/PA/02 Existing Site Plan;
 - 15471/PA/03 Proposed Site Plan; and
 - 15471/PA/04 Rev A Existing and Proposed Elevations.

Additionally, we will arrange payment to the Council to cover the cost of the Advertisement Consent application.

We trust 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 enclosed information, please not hesitate to contact me.

Yours faithfully



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encs: see above