

Our Ref: SD/GM/93456

14 July 2023



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

**WILDSTONE ESTATES LTD
ADVERTISEMENT CONSENT FOR THE ERECTION OF A D-POSTER ADVERTISEMENT
479 HIGH ROAD, WOOD GREEN, LONDON N22 8JD
PORTAL REFERENCE: PP-12283826**

Dear Sirs/Madam,

Please find enclosed an application for advertisement consent to erect a new digital 48 sheet advertisement display at the above site. The site has been selected due to its previous history of hosting an externally illuminated advertisement hoarding. The new poster will be 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

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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 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 erect a digital advertisement display on the gable end of 479 High Road Street which will display multiple static advertisements on rotation. Imagery from Google Street View (**Figure 2 and Figure 3**) shows the site as having previously hosted an externally illuminated display for at least 13 years, from approximately August 2008 to September 2021. Thus the previous poster benefitted from deemed consent having been in place for more than 10 years based on Class 13 of Schedule 3 Part 1 of the Advertisements Regulations.

The proposed panel has the same dimensions as a standard 48-sheet hoarding, measuring 6m(w) x 3m(h) x 0.1m (d) and will be positioned 4m above ground. 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

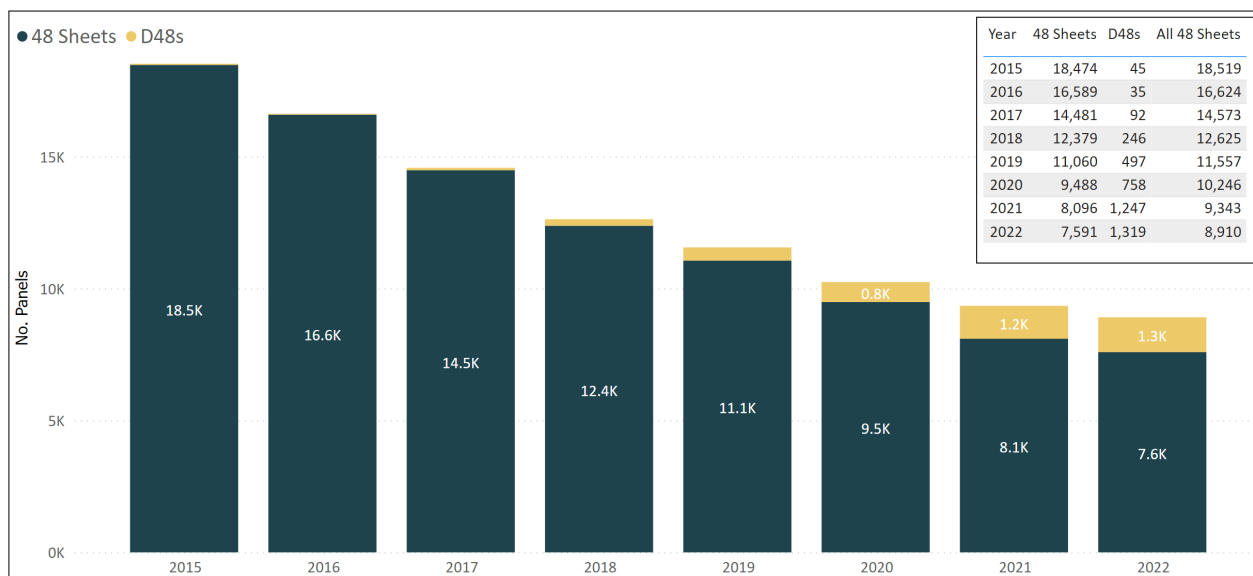


Figure 1 – Reduction in 48 sheet advertising 2015-2022

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.

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 digital advertisement will sit on the gable end of a three-storey residential dwelling situated at the intersection of High Road, A105, and Lascotts Road. The host dwelling is a part of a terrace of semi-detached residences of the same scale and massing. The immediate setting of the site contains a freestanding digital advertisement display on the opposite side of Lascotts Road, which is seen primarily by those who are travelling north on the A105.

To the north of the site is Green Lanes and to the south of the site is High Road. The character of Green Lanes is mixed in nature, comprising three storey buildings with commercial and retail frontages on the ground floor with office and residential space making up the upper storeys. High Road maintains similar uses although heading further south are more residences. Terraced residential dwellings can be found lining Lascotts Road.

In accordance with the categorisations set out in the newly published ILP Guide PLG 05/23, the proposal would be classified as within Environmental Zone 4 (Urban).

The site is in a location where this type of advertising would typically be found, demonstrated by the variety of advertisements that line the street scene of High Road and Green Lanes. Some of the high street signage is internally illuminated and relates to businesses along both roads. Of particular note is the freestanding digital advertisement adjacent to the site with another freestanding vertical digital screen further up Green Lanes.

The site is significantly distanced from any conservation areas as well as locally and nationally listed heritage assets.

The site previously hosted an externally illuminated billboard for at least 13 years as supported by Google Street View in **Figure 2** and **Figure 3**, from at least August 2008 to approximately September 2021.



Figure 2 – August 2008, Google Street View of the site.

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Figure 3 – September 2021, Google Street View of the site.

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 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 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 Development Plan for the area includes the London Plan (2021). Policy D3 highlights the importance of taking a design led approach, whereby all proposals should make the best and most efficient use of the site. Development should enhance the distinct local character and be constructed in a way that is attractive that also weathers well. Policy D8 relates to the public realm, noting that proposals should maintain the safe, well-designed, accessible and inclusive environment. Advertisements specifically should be designed in a way that minimises any potential of light pollution.

The Haringey Local Plan: Strategic Policies 2013 – 2026, consolidated with alterations in 2017 (2017), Development Management Development Plan Document (2017) and the Haringey Unitary Development Plan Saved Policies: March 2013 (2013) all guide the local planning policy for the surrounding area.

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In the Strategic Policies document Policy SP11 highlights design and mentions how all proposals should enhance the built environment of the Borough. Design of proposals should be of a high standard to respect the local context, maintaining the sense of place for Haringey.

Policy DM1 from the Development Management Development Plan Document (2017) relates to delivering high quality design, noting that all proposals should have regard for the form and scale of existing development in the area. Development should address any issues such as noise and light pollution that arises from its use appropriately. Policy DM3 states that applications for advertisements should be designed to be sensitive to appearance of the surrounding area and avoid excessive light pollution to protect residential amenity. The design and siting of an advertisements should not cause a hazard for to pedestrians or any road users.

From the Haringey United Development Plan Saved Policies: March 2013 (2013), Policy UD10 focuses on advertisements, stating that advertisements that do not cause harm to public safety or amenity will be granted consent. Advertisements should be sensitive to the building that it is sited on as well as surrounding street scene. Public safety should be maintained so drivers and pedestrians remain unaffected by advertisements. Light pollution is addressed in Policy ENV7 and proposals are required to reduce and mitigate, where suitable, any pollutants created by the development.

Planning Considerations

The proposal seeks to erect a new internally illuminated digital advertisement display. As mentioned previously, an externally illuminated billboard has been hosted on the gable end of the site for approximately 13 years, with no issues. The proposed D-Poster will not have a cumulative negative impact on the amenity of the immediate neighbourhood, nor the public safety of the adjacent highway, both considerations have been addressed below:

Amenity

The advertisements on the surrounding commercial and retail frontages, the digital panel opposite the site and the externally illuminated poster that adorned the site previously, establishes the site as appropriate for an illuminated digital display of this type.

The proposed D-Poster will present as a typical paper and paste display. The controls within the new advertisement assists with the appearance of the display presenting as the traditional 48 sheet poster as supported by **Appendix 1**. The advertisement will be internally illuminated to appropriate levels at all times during the day. The sensors within the poster allow the screen to be illuminated in a way that the screen does not appear overly as it automatically adjusts to match the different ambient conditions. **Appendix 2** shows the D-Poster in different conditions throughout the day.

Further to the above, a recent appeal decision from 2023, on a site in Manchester confirmed the agreement of the Planning Inspectorate 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).

When compared to the externally illuminated poster that was previously in place on the gable end of the site, the proposed internally illuminated display will be capable of regulating the brightness to ensure that the illumination levels are appropriate for all times of the day. During the evening, the D-

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Poster will be set to a maximum night-time luminance of 300cd/m² as per the categorisations set out in the newly published ILP Guide PLG 05/23.

Modern digital panels like the proposed D-Poster can often be found on the gable end in similar contexts as demonstrated by the examples in **Appendix 4**, which highlights several other approved displays within the Haringey Borough. In addition to the examples that can be found in the Borough, the acceptability of D-Posters is exemplified by the freestanding digital advertisement on the land opposite to the site, albeit the proposed billboard will be of a thinner and more modern design.

The proposed digital poster will have a minimal impact on the amenity of the surrounding residential dwellings. The poster will face directly towards another digital advertisement and behind that is the blank wall of 5 to 11 Green Lanes. The closest residential window is approximately 28 metres to the northwest of the site, although the orientation of the gable end faces northeast, towards Green Lanes and **away** from the residences on Lascotts Road.

The proposal will not be harmful to the amenity of the immediate neighbourhood or the wider surroundings. The site is not located within notable proximity to any heritage assets and there are no conservation areas nearby. The sensors within the digital advertisement will ensure that illumination levels are reflective the ambient conditions. Owing to the above it is concluded that the installation of the digital display will not have an onerous impact on the amenity of the immediate neighbourhood of the site.

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 illuminated advertisements has already been established at this location (the existing signs are 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 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 advertisement will be primarily seen by those who are travelling south on Green Lanes onto to High Road. Both roads are level highways with good forward visibility that maintain appropriate traffic controls to ensure that drivers are practicing a standard level of care while navigating the highway network.

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The position of the new D-Poster will not affect those who are entering and exiting Lascotts Road. The proposed poster will be placed on the host building in a way that will not impact the sight lines of drivers or conceal any road signage. 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 sensors within the poster allow for display to appear as a traditional paper and paste display and will be suitably lit at all times during the daytime and hours of darkness. Additionally, the illumination from the street lighting, the adjacent internally illuminated advertisement as well as the plethora of signage that lines the high street further demonstrates that road users in the area will be able move around with ease.

The proposal to erect a digital display is considered to have no material impact on the level of distraction caused to any road user such that it would have any potentially unacceptable impact on highway safety. 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 on local or surrounding roadways. The examples in **Appendix 4** show that the Council has previously allowed digital screens in similar settings around the Borough.

Under these circumstances, with the site having hosted a display which benefited from deemed consent, the proposed D-Poster would not constitute a hazardous distraction to anyone exercising a reasonable standard of care on the adjacent highway networks. 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;
- 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 erect a new D-Poster on a site that has previously hosted an externally illuminated billboard. The new D-Poster will be of the same scale and orientation as the previous poster although at a reduced depth with enhanced illumination capabilities.

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The proposal will be located in an area of a mixed character, in a position where advertising of this type is commonplace. 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.

For these reasons and the matters set out above, it is considered that this 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 – Examples of Digital Posters in Haringey Borough
- Architectural drawings including;
 - 011-0114-6070/PA/01 Site Location Plan
 - 011-0114-6070/PA/02 Existing Site Plan
 - 011-0114-6070/PA/03 Proposed Site Plan
 - 011-0114-6070/PA/04 Existing and Proposed Elevations

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

I trust that the above is clear and we look forward to receiving notification that the application has been registered in due course. Should you have any queries in relation to any of the attached information, please do not hesitate to contact me.

Yours faithfully,



Sarah Daniels
Planner

e-mail: planning.consultancy@alderking.com
direct dial: 0117 317 1173

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