

Our Ref: KA/GM/93456_FS018

4 August 2025

Mid Sussex District Council
Oaklands
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS



Dear Sir/Madam

**TOWN AND COUNTRY PLANNING (CONTROL OF ADVERTISEMENTS) (ENGLAND)
REGULATIONS 2007
BRIGHTON ROAD, HAYWARDS HEATH, RH17 6BL
PROPOSED ERECTION OF TWO D6 SMALL FORMAT ADVERTISEMENT DISPLAYS**

This cover letter has been prepared on behalf of Wildstone Estates Limited, an outdoor media infrastructure provider, and is submitted in support of an application for advertisement consent to erect two single-sided freestanding end D6 small format advertisement displays at the above site.

The site comprises a Petrol Filling Station (PFS) owned by Motor Fuel Group (MFG), the largest independent forecourt operator in the UK. The Company currently has around 1,200 sites which offer customers a growing dual-fuel strategy, a versatile valeting offer and a convenient retail and 'food to go' portfolio. Wildstone Estates Limited is working in partnership with MFG to modernise existing advertising infrastructure across the MFG portfolio and where possible to rationalise and declutter existing advertisements, which aligns with an industry wide programme.

The Proposal

The proposal seeks to erect two single-sided freestanding end D6 small format advertising displays which will exhibit static advertisements on rotation. This is a standard small format advertisement, which is found across the UK in roadside, retail and transportation environments. There are over 75,000 '6 sheets' in the UK. The advertisement which is the subject of this application is primarily aimed at users of the PFS rather than road users.

The proposed D6 small format advertisement displays have the same dimensions as a standard 6-sheet hoarding, measuring 1.23m(w) x 2.4m(h) x 0.22m (d). The proposed advertisement will utilise LCD digital technology, which is durable, efficient and can be easily erected with minimal engineering. The quality of the image produced will mimic that of a traditional paper and paste display. The proposed display will meet modern requirements and will be capable of displaying 6 advertising campaigns at a time, sequencing every ten seconds. The advertisements will comprise local and national campaigns as well as goods and services sold on site.

The D6 small format advertisement displays will be monitored and controlled remotely in real time from a Network Operation Centre (NOC) to display advertisements and facilitate responsive maintenance where necessary. Diagnostics software can report any small technical faults (e.g. a broken panel) so

that a kill switch can turn the content to black. Engineers are able to respond within 24 hours to any issues which require attendance.

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.

The proposed displays will operate with a system of threshold controls, timers and light sensors to ensure that the luminance never exceeds the ILP guideline figure at nighttime, with lower thresholds set on more sensitive sites.

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 are included with this statement for clarity.

The Site

The proposal site is located within the wholly commercial entity of the PFS, and the D6 small format advertisement displays will be positioned within the site boundary. The immediate site surroundings within the petrol filling station are commercial in character.

The PFS is located on the west side of the A23, a straight, three lane carriageway. The context of the site is a mixture of rural landscape and residential. The road is bordered by large trees and shrubbery, which also separates the PFS from the A23 so that it is not visible for motorists who do not turn off the main road. The station is also enclosed by fencing and trees, so that the PFS is not visible to nearby residential properties. To the north and south of the PFS there are mostly residential areas stretching along the A23 (Handcross). Beyond the town, the context predominantly consists of fields and woodland areas. This natural landscape extends further to the wider context of the site.

Several advertisements feature within the PFS, including a large banner, a totem sign and a branded canopy. The proposed D6 advertising displays would reduce the need for other temporary advertisements, such as the wall mounted posters and the free-standing boards, allowing for less clutter within the PFS area.

The site is located within a Built Up Area Boundary, beside a Protection and Enhancement of Countryside area (DP12) where land taken for development is minimised. This area is also within a High Weald AONB (DP16), where development must conserve and enhance the natural and local amenity of the area.

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 2 (Rural).

The site is in a location where advertising of this type would typically be found as it is commercial in nature and experiences a high degree of customer activity.



The site in October 2024, Source: Google Maps

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 statutory development Plan for the area consists of the Mid Sussex District Plan (2018). Policy DP26 of the District Plan focuses on character and design, and states that proposals should seek to avoid or mitigate any potential adverse impact on the surrounding area and that they should have regard for location, character of location, size, and public safety. Policy DP29 addresses light pollution, stating that illumination should not have a severe impact on local amenity.

Planning Considerations

The proposed commercial location is considered to be appropriate in principle for a D6 small format advertisement display and in line with planning regulations, the impact of the proposal has been considered in amenity and public safety terms and are addressed in turn below:

Amenity

National Planning Practice Guidance confirms, at Paragraph 079, that *“In practice, “amenity” is usually understood to mean the effect on visual and aural amenity in the immediate neighbourhood of an advertisement...”*. In this case, the immediate neighbourhood is the petrol filling station itself since, in

the context of the wider setting, the filling station structures (shop/canopy/pumps and other features) will remain by the far dominant visual attractor. It is a design requirement that petrol filling station forecourts must be “adequately illuminated” at all times, with a minimum design illuminance of 100 lux at ground level (Section 9.5.6, APEA Blue Book – 4th Edition, April 2018). Therefore, the context of the site is one of an already developed, well illuminated commercial operation. The effect on amenity of the proposed D6 advertisements on this well-lit immediate neighbourhood will therefore be minimal.

The proposal would assimilate into the commercial context of the site. One of the advertisement displays will be located to the southwest of the site, whereas the second will be at the north boundary of the site, near the entrance of the PFS. Both displays will be situated beside a timber fence and shrubbery, therefore not impacting any existing views. The existing, large canopy, retail kiosk and tall totem signpost on site will attract more attention from passersby than the proposed advertisements. Considering the small nature of the proposal, as well as the presence of other signage, the amenity of the site will not be impacted.

A similar proposal of equal dimensions has recently been approved at Cuckfield Service Station, Haywards Heath, West Sussex, RH17 5DA (ref: DM/25/0561). This proposal authorises the installation of an illuminated D6 advertisement display within a PFS, located in a mixed rural and residential area not far from the site. Therefore, the proposal is considered to be appropriate at this location.

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. The nearest conservation area is outside of the immediate neighbourhood of the site, being approximately 100m away. As such, it would not be affected by the proposal.

In accordance with the categorisations set out in the newly published ILP Guide PLG 05/23, it is recommended that the maximum nighttime luminance of the display should be set at 300cd/m². The reduction in night-time luminance in Environmental Zone 2 will further mitigate any potential impacts at night and ensure that the display is not dominant. The residential properties adjacent to the PFS are approximately 30m away from the site and are separated by trees and shrubbery, so there is no view of the PFS from the properties. Therefore, residents would not be impacted by the illuminance of the signage. The PFS is illuminated between 6.00am-10pm throughout the week, which would provide more prominent lighting compared to that emitted by the proposed advertisement display.

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. The petrol filling station is a well-established host of advertising relating to the business premises and products available. The proposed advertisement is intended to be viewed by users of the filling station whilst they are filling/charging their vehicle or stopping to use the site's shop.

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. 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 proposed signs would be situated on the north and south sides of the site boundary and would only be visible to entering the PFS. Additionally, due to the vast green area west of the PFS the

motorists travelling along the A23 have no view of the PFS or the proposal within it. Where the motorists are using the PFS, the display at the south side of the site will likely only be viewed whilst stationary or when exiting the site. Whilst exiting, motorists will be travelling at an extremely reduced speed, at which point they will have no issues briefly observing the advertisement and continuing their journey. Similarly, the display located at the entrance will be viewed alongside all the other signage within the PFS when motorists reach the site. Therefore, the proposal will be anticipated by motorists and safely observed as they travel at a significantly reduced speed within this area.

The commercial nature of the PFS indicates the presence of several types of signage within and around the site, which would be expected by motorists entering the area. The advertisements displayed in the proposal will be static images, changing every 10 seconds. The images will not distract nearby drivers as the advertisements displayed will resemble the surrounding signage. Furthermore, the transition between the advertisements will be continuous and regular, so will not distract motorists.

The space leading to the PFS shows no unusual complexities, where the driver would require extra care to be taken when passing the site and motorists operating in this location will be moving at a considerably slow speed. The junction to re-enter onto the A23 located east of the site is the only junction nearby, which is a considerable distance away from the proposal. Thus, drivers would be entirely capable of glancing at advertisements whilst maintaining stopping distances and an awareness of surrounding traffic movements.

According to crashmap.co.uk there have only been a few slight accidents near the PFS, all of which took place on the A23, rather than the road leading to and from the PFS. Therefore, the location of these incidents suggests that the PFS had no impact on the events.

Conclusion

The proposal seeks to erect two D6 small format digital advertising panel at the site which is considered to be an appropriate location for advertising in principle and will contribute to the wider modernisation of the sites which sit within the MFG portfolio. The size and scale of the D6 small format advertisements display is de-minimis in the context of the PFS. PFS sites are an appropriate location in principle for this form of advertising and the positioning and operational controls have been carefully considered to ensure that the proposed 6-sheet digital advertising displays fit in appropriately to the site and the wider surrounding area and will have a negligible impact on public safety.

The proposed conditions to control the operation of the advertisements including the luminance of the digital display will ensure that there is no adverse impact on visual or residential amenity or public safety.

For these reasons and the positive benefits set out, it is not considered that the proposal would have any detrimental impact on amenity or public safety and as such should be capable of being granted consent subject to appropriate conditions to control the operation of the advertisements.

4 August 2025

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Application Submission

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

- Completed application forms
- Letter Statement (this letter);
- Architectural drawings including;
 - 25551/PA/01 Site Location Plan
 - 25551/PA/02 Existing Site Plan
 - 25551/PA/03 Proposed Site Plan
 - 25551/PA/04 Existing and Proposed Elevations
 - 25551/PA/05 Specifications
 - 25551/PA/06 Existing and Proposed CGIs

Additionally, we will arrange payment to the 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

