JT/93456

28 May 2024

Wrexham County Borough Council
Planning Service
16 Lord Street
Wrexham
LL11 1LG

WILDSTONE ESTATES LIMITED
ERECTION OF EXTERNALLY ILLUMINATED POSTER TO DIGITAL DISPLAY
EAGLES MEADOW SHOPPING CENTRE, WREXHAM, LL13 8DJ
PLANNING PORTAL REFERENCE: PP-13097804

Dear Sirs/Madam,

Please find enclosed an application for advertisement consent for the erection of an internally illuminated digital display to be placed at Eagles Meadow Shopping Centre, Wrexham. The site currently supports a traditional paper-and-paste billboard. The proposed display will be the same size as the existing sign and will be 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 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.

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 in a suitable contrast to the ambient light at nighttime.

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As the 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 the landlord to all of the major operators, Wildstone is 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 an externally illuminated hoarding with a modern internally illuminated digital advertisement (D-Poster) at Eagles Meadow Shopping Centre close to the roundabout. The proposal will display multiple static advertisements on rotation. The site currently supports a traditional paper-and-paste billboard.

The proposed panel will be the same size as the current 48-sheet hoarding. The display will measure 6m(w) x 3m(h) x 0.15m (d) and will be positioned 4.66m above ground. The proposed display will be located higher up the same elevation compared to the existing billboard.

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 nationwide 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, 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 paper 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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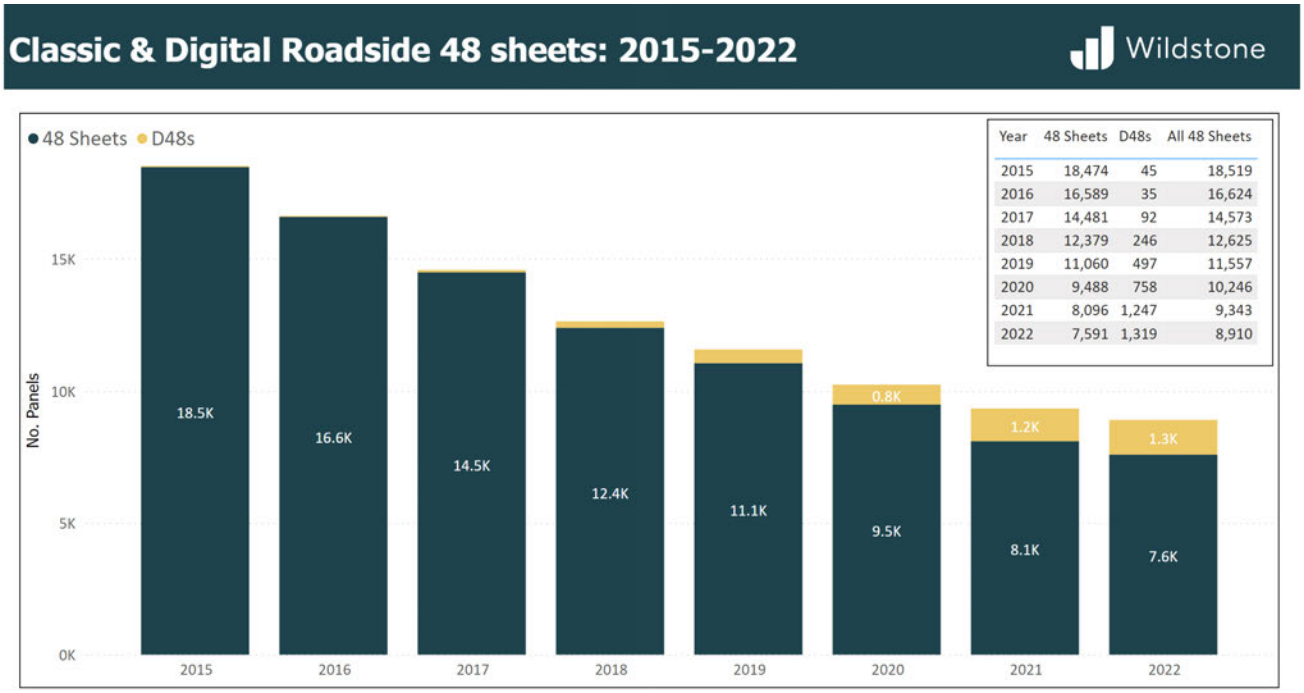


Figure 1 – Reduction in 48-sheet advertising 2015-2022

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, 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 in **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 forward. 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 proposal site is located on the southern elevation of the Eagles Meadow Shopping Centre in Wrexham Town Centre. The site currently supports a static non-illuminated billboard sign facing south over the road.

The immediate surroundings of the site are mixed commercial in nature. The Eagles Meadow Shopping Centre lies immediately to the north, east and west of the site, with the car park for Halfords being located opposite the site.

There are no residential dwellings near the site and the site is not in a conservation area or close to any listed buildings.

The site is an established location for advertising, having supported a billboard sign since at least August 2018. Other signage within the area includes a digital display screen to the east and signage related to Eagles Meadow.

Planning Policy

The legislative framework for the control of advertisements is contained within the Town and Country Planning (Control of Advertisement) Regulations 1992 (as amended). Regulation 4 states that advertising should be controlled in the interest of amenity and public safety.

The Planning Guidance (Wales), Technical Advice Note (Wales) 7, Outdoor Advertisement Control (1996) sets out the government's advertisement guidance for Wales and how it should be applied. Following paragraph 6, the display of outdoor advertisements can only be controlled in the interests of amenity and public safety. Paragraph 7 sets out the consideration of amenity and paragraph 8 states that when Local Planning Authorities are considering how brightly advertisements should be illuminated, regard should be had to available guidance. Paragraph 10 states that in assessing an advertisement's impact on public safety, local planning authorities should have regard to its effect on the safe use and operation of any form of traffic or transport on land (including the safety of pedestrians). Advertisements should not be sited where they could cause possible confusion with any traffic sign or other signal, and possible interference with a navigation light or an aerial beacon.

The development plan for the area consists of the Wrexham Local Development Plan 2 (LDP2) 2013 to 2028 (2023). The LDP2 does not have any specific policies concerning advertising. The supplementary planning guidance note 1 relates to advertisements. The guidance states that advertisements should only be controlled in the interest of amenity and road safety. Concerning hoarding sites, the guidance states notes that large roadside advertisement hoardings have a marked effect on the locality and such proposals will be resisted in conservation areas, rural areas, and residential areas.

Planning Considerations

The proposal seeks to erect a new digital display at the Eagles Meadow Shopping Centre, replacing an existing traditional paper display. The proposed new digital display will be the same size as the existing billboard, albeit higher up the elevation. The impact of the proposal has been considered in terms of amenity and public safety as follows:

<u>Amenity</u>

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The proposed sign will be in an established location for advertisements. The current billboard has been in place for around 6 years without issue. The proposed display will be the same size compared to the existing billboard, albeit located further up the elevation. The display will not be a dominant feature of the elevation given the size of the shopping centre and will be lower than the main signage for Eagles Meadow.

The illumination of the D-Poster is controlled by sensors that gauge the ambient conditions which ensures that the poster does not appear overly bright. **Appendix 1** presents a side-by-side view of how a digital display appears with appropriate controls in place.

Following 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/m2. 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, this will mean that the display is visible but not overly bright. The proposed display will have a dynamic brightness control whereby sensors will ensure that the display is only as bright as it needs to be at all times. Given that brighter displays consume more power, it is in the site operator's interest to ensure that the displays are never brighter than they need to be. This reduced the impact of the display on the appearance of the area in terms of illumination.

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 different locations.

There will be no views of the display from any residential windows. The display will dim significantly during the night and is in an area which already contains a mix of illumination from streetlighting and existing advertisements. The digital display to the east was granted consent by planning committee in 2021 (ref: WRC P/2021/0889). Following this approval, the display has been in operation without issue. The proposed display will be operated in the same way as the display to the east so there is no reason it would not also be acceptable in this location.

Considering the nature of the site, its surroundings, and the presence of other signage in the immediate context, there would be no impact on the appearance or character of the immediate area. The site is currently used for advertising without issue and change of the existing display to digital will have no material impact on 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.

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. Nevertheless, it is an accepted fact that advertisements are intended to attract attention.

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Over the past decade, an industry-standard set of conditions has been established to control their use and minimise the potential for driver distraction. The proposal will operate within these conditions, thereby limiting the potential for distraction.

The proposed billboard is close to a roundabout on Smithfield Road. The roundabout is marked with defined lanes which indicate clear driver priority and direction. There is good visibility of the roundabout and the proposed billboard for some distance, meaning the billboard will not cause any unnecessary distraction to approaching drivers regardless of which approach they are coming from. The most direct view of the billboard would be travelling north towards Eagles Meadow via Salop Road. The sign will only be viewed in short and mid views and will therefore not distract the drivers.

The proposed display would occupy the same setback and offset position as the existing unit, ensuring site lines and visibility splays are maintained. It would be seen by traffic travelling along Salop Road, which is limited to 30 mph, well-lit, straight, level, and has excellent forward visibility. Highway users would therefore be fully capable of glancing at content far in advance of the site without being distracted by the road or traffic conditions ahead. As such, drivers would be entirely capable of viewing advertisements whilst maintaining stopping distances and an awareness of surrounding traffic movements.

This site is an established location for advertisements, as it currently supports a traditional paper-and-paste advertisement on this elevation. The proposed display will not distract drivers and any driver exercising a standard level of care will be able to navigate the area with ease.

Under these circumstances, the new display would not constitute a hazardous distraction to anyone exercising a reasonable standard of care. Digital advertisements are increasingly common along roadsides as replacements for paper billboards. As such they are not out of keeping and will be familiar to road users within this urban streetscape. Consequently, the proposal would not give rise to any public safety issues, which would prevent the granting of 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 association 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.

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These are development benefits that will not be achieved by maintaining the status quo.

Conclusion

The proposal seeks to erect a new D-Poster at Eagles Meadow Shopping Centre. The proposed display will be the same size as the current display which is to be removed and will operate in such a way as to mimic a traditional poster. The proposed conditions to control the luminance of the screen 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

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 – Digital Screen Examples.
- Appendix 5 – Proposal Factsheet.
- Architectural drawings including;
    - 21545_PA_01_Site Location Plan
    - 21545_PA_02_Existing Site Plan
    - 21545_PA_03_Proposed Site Plan
    - 21545_PA_04_Existing and Proposed Elevations

Additionally, we will arrange payment to Wrexham County 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 concerning any of the attached information, please do not hesitate to contact me.

Yours faithfully
for ALDER KING LLP

JAMES TARPY
Senior Planner

E-mail: planning.consultancy@alderking.com
Direct dial: 0117 317 1000
Enc(s) as above