Our Ref: SD/GM/93456

9 August 2024

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

WILDSTONE ESTATES LIMITED
ERECTION OF NEW FREESTANDING DIGITAL DISPLAY
RUABON BY PASSAGE, RUABON, RUABON BY PASS, WREXHAM, LL14 6YY
PORTAL REFERENCE: PP-13313178

Dear Sirs/Madam,

Please find enclosed an application for advertisement consent for the erection of a new freestanding digital display to be placed at the above site. The site has been selected due to its suitability for advertising and will help to establish a network of suitably located displays in the area. It will be capable of being operated from a central location and significantly reduce vehicle trips for reposting when compared with a traditional poster and paste billboard.

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.

/Cont'd...

Alder King LLP is a Limited Liability Partnership registered in England and Wales No. OC306796. Registered Office Pembroke House, 15 Pembroke Road, Bristol BS8 3BA. A list of Members is available at the registered office.

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 one new freestanding internally illuminated digital sign (D-Poster). The proposed D-Poster will display multiple static advertisements on rotation. The proposed panels have the same dimensions as a standard 48-sheet hoarding, measuring 6m(w) x 3m(h) x 0.1m (d) and will be positioned 2m 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 and service some new locations, but which will see an overall reduction in advertisements, as multiple advertising campaigns can be supported by 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.

/Cont'd...

9 August 2024

Wrexham County Borough Council, Planning Department

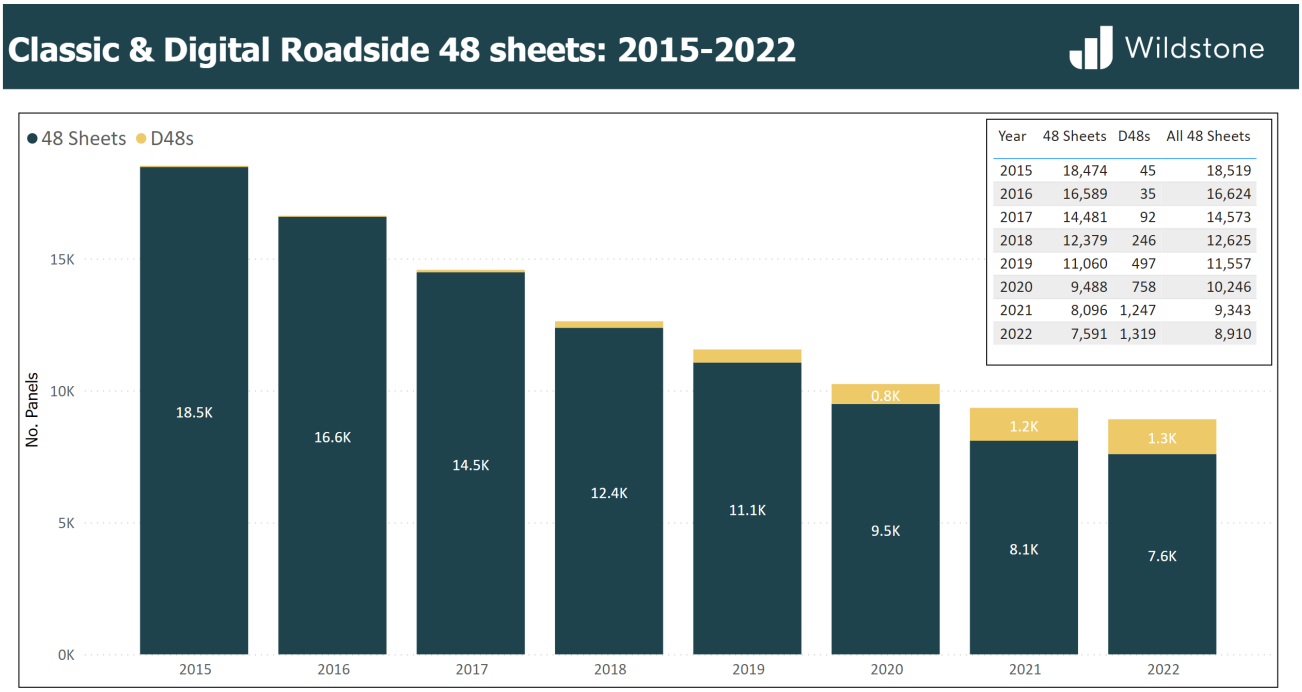


Figure 1 – Reduction in 48 sheet advertising 2015-2022

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 4** 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.

/Cont'd...

9 August 2024

Wrexham County Borough Council, Planning Department

The Site

The proposed freestanding advertisement will be located on land north of an Esso petrol station forecourt. The site is separated from the forecourt by a slip road from the petrol station onto the A483 sited east of the site. The petrol station maintains a car park, an illuminated forecourt, and a convenience store. The wider surroundings comprise an Indian restaurant to the south, Maahis, as well as a residential neighbourhood. Any sensitive frontages are sufficiently distanced from the site.

There are a number of illuminated elements that surround the site including streetlighting following along the adjacent A-road, the illuminated petrol station forecourt, an internally illuminated Esso totem and as well as signage for the convenience store.

The proposed advertisement will primarily be seen by those traveling northbound on the A438.

The site is suitably distanced from any heritage assets of national and local value as well as any conservation areas.

Planning Policy

The legislative framework for the control of advertisements is contained within The Town and Country Planning (Control of Advertisements) Regulations 1992 (and 2017 Amendments). Regulation 4 states that advertising should be controlled in the interest of amenity and public safety, taking into account any material factors.

Planning Policy Wales (PPW) is the National Planning Policy for Wales. Technical Advice Notes (TANs) supplement PPW and give greater clarification. TAN7 'Outdoor Advertisement Control' provides advice on how Local Authorities should assess advertisement applications. The Guidance recognises "…the importance of advertisements to the national economy…" and states that guidance at the local level "should not stifle original designs or new display techniques" (Paragraph 4). It also confirms that outdoor advertisements can only be controlled in the interests of amenity and public safety (Paragraph 6). The Guidance further states that in relation to assessing public safety, Local Planning Authorities are expected to have regard to advertisements' "effect upon the safe use and operation of any form of traffic or transport on land including the safety of pedestrians, on or over water, or in the air" (Paragraph 10).

TAN7 accepts that an applicant is not required to demonstrate a "need" for the advertisement and Paragraph 7 states that account should also be taken of factors which may be to the advantage of the amenity of the locality such as "adding appropriate colour and interest to a drab area or screening an eyesore". Additionally, the Guidance states that Local Authorities must be consistent in the "general approach towards the determination of applications in particular localities" (Paragraph A3).

The Local Planning Guidance Note No. 1 relates to advertisements in Wrexham. The guidance states that the design of hoardings must be sensitive to the surroundings and enhance the street scene while protecting any sensitive environments. Advertisements will be assessed based on their impact on amenity and road safety.

/Cont'd...

9 August 2024

Wrexham County Borough Council, Planning Department

Planning Considerations

The proposal seeks to erect a new internally illuminated freestanding D-Poster on land north of an Esso petrol station forecourt in Ruabon. The proposed location is considered to be suitable in principle for advertising and the impact of the proposal has been considered in amenity and public safety terms as follows:

Amenity

The proposed freestanding D-Poster will mimic a paper and paste poster, while bringing the benefits of a digital display. The side-by-side comparison photograph on the D-Poster information sheet provided in **Appendix 1,** demonstrates the minimal difference between paper and paste posters and a digital display. Furthermore, a recent appeal decision on a site in England 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, Manchester, M4 4BW).

The static lighting from the forecourt of the petrol station, surrounding illuminated advertisements as well as the adjacent road network means that the site location is in a well-lit area. The addition of the illumination from the D-poster will not appear out of place or cause any material adverse impacts on the amenity of the immediate surroundings. The illumination is controlled by sensors that gauge the ambient conditions which ensures that the poster will not appear overly bright. Ambient lighting conditions change over the course of the day and the sensors within the display are able to measure and adjust the illumination of the display accordingly. The examples found in **Appendix 2** further demonstrate the functionality of display controls.

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/m2. **Appendix 3** shows a D-Poster at night-time, with the 300cd/m2 controls in place to demonstrate that the proposal will not give rise to any material harm to amenity and the advertisement presents as acceptable in this semi-urban environment.

The proposal would not be detrimental in either an immediate or wider sense. It is not within a conservation area nor in close proximity to any listed building. The nearest sensitive receptors are sufficiently distanced. The proposed advertisement will have no special effects, animation or movement that would increase its visual prominence and the nature of the illumination proposed means that light-spill from the signs will be minimised. Owing to the above, the new D-Poster will not negatively impact 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. Additionally, 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.

/Cont'd...

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 sensors in the posters 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 could distract drivers as demonstrated in the examples found in **Appendix 2**. The new D-Poster will operate within the conditions 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 advertisement will be seen by those who are travelling north on the A483 as well as from the slip from the petrol station on to the A-road, which is a well-lit and level highway with excellent forward visibility. There are appropriate speed controls in place to ensure that drivers are able to navigate the highway safely while maintaining appropriate stopping distances.

The poster will be statically illuminated at all times which ensures that drivers travelling on the southern slip road and the A483 will not be dazzled by the display. The position of the new D-Poster will not affect those entering and exiting the adjacent petrol station as the display 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 advertisements will transition instantly without any special effects to further minimise any negative impacts on highway safety. The 10 second duration for advertisements to be displayed is a well-established standard across the advertising industry and the D-Poster will present advertisements that are still images with no moving animations or videos. 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.

Accordingly, the proposed internally illuminated display would not constitute a hazardous distraction to anyone exercising a reasonable standard of care while driving on the adjacent slip road as well as the A483. Consequently, the proposal would not give rise to 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;

/Cont'd...

- 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 freestanding 48-sheet digital display on land north of the Esso petrol station. The proposed advertisement will be internally illuminated and appropriately controlled so that it appears as a traditional paper and paste hoarding would. The sensors in the poster will be able to adjust the brightness to match the ambient conditions throughout the daytime and the limited illumination level will ensure that the display is not over illuminated during hours of day. The conditions put forward to limit 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 – Proposal Factsheet
- Architectural drawings including;
    - 23205/PA/01 Site Location Plan
    - 23205/PA/02 Existing Site Plan
    - 23205/PA/03 Proposed Site Plan
    - 23205/PA/04 Existing and Proposed Elevations

Additionally, we will arrange payment to the Wrexham Country 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.

Yours faithfully

/Cont'd...

9 August 2024

Wrexham County Borough Council, Planning Department

[redacted]

Sarah Daniels
Planner

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

enc (s)