

CHRIS WELBOURNE

Outdoor Advertising Services

Inspection, Survey and Consultancy Services to the Outdoor Advertising Industry

Address:

16 Layton Park Avenue
Rawdon
Leeds
LS19 6PL

Mobile: 07836 236653

E-mail: c.welbourne@yahoo.co.uk

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

My Ref: CW/LL 102

20th December 2019

Dear Sir /Madam

The Town and Country Planning (Control of Advertisements) Regulations 1992

Re: Land at Pentre Felin c/o Lea Road Wrexham LL13 7NB

Proposal: Upgrade of existing 1 x 48 sheet advertising hoarding to 1 x 48 sheet digital advertising display unit.

Please find enclosed our application for express planning consent to display static digitally produced advertisements, as opposed to traditional printed paper posters on the above 'site'

This planning statement should be read in conjunction with other documents submitted in support of the advertisement application.

The application seeks the following:-

"Replacement of existing 1 x 48 sheet advertisement hoarding with 1 x 48 sheet digital advertising display unit".

There has been 1 x 48 sheet advertisement displayed on the above 'site' since 1994, and therefore the application site is an established advertising location, which benefits from 'deemed planning consent' under Class 14 of the Advertisement Regulations, which allows advertisements to be displayed on a 'site' after expiry of 'express consent'.

Express consent was originally granted for 1 x 48 sheet illuminated advertisement hoarding on 11/04/1994 (**App.Ref.No.22170 WRO**). A copy of the Planning Officer's Report has been submitted with the application as support documents **LL 102 A4 09** and **LL 102 A4 10**. The site has been used for the display of advertisements for over 25 years without any complaints or objections, and it is not considered to be detrimental to amenity or public safety.

The earliest available site photograph has been supplied as support document **LL 102 A4 05**, which shows the street view in March 2009 with the 48 sheet advertisement illuminated by an overhead light unit, although it is believed that, following maintenance problems in recent years, this light unit has been removed and not yet replaced.

The proposal is for a 48 sheet illuminated digital advertisement, which would be comparable in scale and operation to the existing advertisement, and it is not considered that its continued use, or the modification of its presentation style, will undermine the character and setting of the area or pose any public safety concerns.

This application proposal seeks to improve both the quality of the advertisements and their contribution to the street scene with the introduction of digital technology, which offers many practical and sustainable benefits: reduced energy consumption; easy recycling of component parts; and a vastly reduced number of maintenance visits to site.

Site and Surroundings

The application site is located on vacant land at the junction of Pentre Felin and Lea Road bordering the St Mary's primary school. The proposed display would be located at the westerly end of the site (i.e. close to the stepped pedestrian access to the school), and would face traffic heading west towards the Island Green Shopping Park and Railway Station. The site is close to Wrexham town centre and the surrounding area contains a wide range of commercial uses.

With the street scene of commercial buildings, traffic travels through this built up area with development, activity, and signage on all sides. This is typical of an area where large roadside advertisements can be accommodated without any adverse effect upon visual amenity.

During the time that the site has accommodated 48 sheet illuminated advertising displays, there has been little change in the circumstances of the locality (as can be seen in support document **LL 102 A4 08**, which shows the street scene in 1994 before the hoarding was erected). It is considered that the existing display has been assimilated into the background of the area, and it has been accepted that it has no impact on the visual amenity of the locality.

Background Information

The purpose of the application is to replace the existing "paper and paste" display with a digital equivalent, a now increasingly common occurrence as the outdoor industry moves towards more flexible and sustainable media platforms.

The shift towards digital display screens away from traditional formats is a positive response by the outdoor media industry to the Ministerial forward in the National Planning Policy Framework (NPPF) which states that, "*development means growth and we must respond to the changes that new technologies offer us.*" The NPPF states further that "*advanced, high quality communications infrastructure is essential for sustainable economic growth*".

The clear thrust of the above-mentioned national policy is that those involved in development and development control need to respond to the changes and innovations offered by new technology. Part of the national project to bring the outdoor industry's stock of traditional billboards into the 21st century has involved the removal or upgrade of a large number of "paper and paste" hoardings.

Digital advertising has become more common on key arterial routes in town and city centre locations across the United Kingdom. Many Local Planning Authorities across the country have supported media owners with their proposals to replace existing advertisement hoardings with digital advertising display units by granting consents for these "like for like replacements".

This application seeks its replacement with a display unit of similar proportions, orientation, and static images. With paper and vinyl images becoming an outdated medium, digital technology offers many

practical and sustainable benefits, and the proposal is therefore a “like for like” replacement, but with the additional modernisation of the display unit,

A recent planning decision by a neighbouring LPA is considered relevant to the application proposal. The decision by Denbighshire County Council relates to the replacement of an existing 48 sheet advertisement with 1 x 48 sheet digital advertising display unit at 8 Kinmel Street Rhyl LL18 1AH (**App. Ref. No. 45/2018/ 1155**). A copy of the decision notice has been submitted with the application as support document **LL 102 A4 11**. It is considered that the consented display mirrors the application proposal in terms of exhibiting the same operational characteristics of landscape orientation, digital illumination and static images, and being located in a setting of mixed commercial use.

The outdoor advertising industry is committed to upgrading its assets, in order to ensure greater efficiency savings in operational costs, exceptional flexibility in display capability, and a more sustainable method of roadside advertising. The electronic method of changing advertisements (in contrast with the manual method of changing traditional poster displays) eliminates the need to physically produce posters, with the resultant savings in energy and material consumption across the media.

The introduction of digital technology is not considered to be a major material alteration to the manner of use of this site for advertising displays. Advertising guidelines state that static digital advertising is likely to be acceptable in locations where static advertising exists.

Local and national policies state that advertisements should be subject to control only in the interests of amenity and public safety, and therefore this application will be need to be assessed in terms of the effect of the digital display upon amenity and public safety.

Planning Considerations

The relevant regulations are The Town and Country Planning (Control of Advertisements) Regulations 1992, which state that applications for express consent are to be determined in the interests of amenity and public safety. The Welsh Government has also confirmed that Supplementary Planning Guidance (SPG) can be treated as a material planning consideration when LPAs determine planning applications. The relevant policies in the Wrexham Unitary Development Plan are GDP1 – Development objectives and PS2 Development and the Environment.

Application Proposal

This Applicant seeks express planning consent for an ‘alteration in the manner of the use of the site for the display of advertisements’. The application proposal is to replace the traditional timber 48 sheet panel which displays paper poster adverts, with a new 48 sheet advertising panel, which will display the same types of advertisements, however, these will be digitally produced rather than printed. To the road user, there will be no discernible difference, other than the static digital adverts will change once every 10 seconds each day, rather than the same poster advert being displayed for the full day.

The proposed unit measures 6496mm wide x 3448mm high, sitting approximately 1.8m above ground level in landscape format as per the existing panel, however rather than be of wooden construction with a tin posting surface, it comprises a pressed metal frame in which the LED “tiles” are mounted. The proposal is therefore a “like for like” replacement, but with the additional modernisation of the display unit, which will improve both the quality of the advertisements and their contribution to the street scene.

The proposed display would be digitally illuminated as opposed to overhead illuminated. However, the light does not radiate in the same way as either externally illuminated displays or traditional backlight units. In this regard the illumination only highlights the matter contained within the display. We do not consider that the proposal would be significant in the street scene as the display is located in close proximity to other sources of illumination and street lighting, which emit a considerably higher intensity of light.

The proposed digital 48 sheet advertisement is controlled remotely via a dedicated internet connection and computer software that controls every aspect of the display in real-time, including brightness, timing of each image, transition time between each image and transition method etc. The screen is also linked to sensors which detect external lighting levels and automatically adjust the screen's level of luminance.

The digital 48 sheet advertisement will display static changing images with a smooth, uninterrupted transition from one image to another. There are no moving images, animation, intermittent or full motion video images, and there is no sound.

In summary, the existing advertisements at the application site now appear outdated site in both design and method of presentation. The proposal therefore, contained within this application, aims to improve the appearance and technology used in the display of images on the site. The introduction of digital displays represents a sustainable display methodology that is greener and cleaner than the traditional methods used on the existing advertisement.

Local and national policies state that advertisements should be subject to control only in the interests of amenity and public safety, and therefore this application will be assessed on this basis.

Amenity Assessment

Advertising guidelines state that static digital advertising is likely to be acceptable in locations where static illuminated advertising exists. It is therefore reasonable to conclude that the proposed 'like for like' replacement would be acceptable, as the principal of the display of illuminated advertisements on the site has been well established over a long period of time, without complaint. As such, it is also reasonable to conclude that its continued use and / or the modernisation to allow for the replacement of the timber 48 sheet advertisement with a new display of static digitally produced advertisements on the 'site', will not be detrimental to amenity.

There are no heritage assets located in proximity to the application site, which could be detrimentally effected by the proposed display, and the site is not within a conservation area.

There are no significant residential properties in the immediate vicinity of the application site, and so the proposed display would not have any detriment to residential amenity in a location.

Clearly owing to the historical nature of the site, and that it has been used for the display of advertisements of similar characteristics without any complaints or objection, the proposed display is not considered to be detrimental to amenity. The setting is considered as entirely appropriate for illuminated roadside advertising in line with the policy framework. The environment is highway dominated and predominantly commercial in character. The application site is located in an area, where roads pass through the built up area with development activity and signage on all sides.

Public Safety Assessment

The main consideration with this submission is whether the modernisation of the site and the display of a digitally produced static advertisement rather than a printed static poster is likely to cause a hazard to public safety.

Digital advertisements are now a common sight on arterial roads in major towns and cities and as such, are not an "unusual" distraction for drivers. Drivers are used to distractions in urban areas, whether it be buildings, people, shop fronts, traffic signs or other adverts. The proposed display would be no different in terms of attracting a driver's momentary attention and would not impact on the driving task.

Advertisements have been displayed on this site for over 25 years and they have not been considered to give rise to any highways or road safety issues. There have been no material changes in circumstances at the site in terms of public safety in recent years.

The proposed display would be visible to traffic heading west on Pentre Felin, where traffic passes on this stretch of road, which is wide and open and located in a 20 mph speed controlled zone, due to the

proximity to the school. The passage of traffic is relatively simple and drivers are faced with limited decision making. As such, it would appear in principle to be an appropriate location for advertising. On a relatively simple approach to the site, drivers have plenty of capacity to assimilate information without impacting on their decision making or their ability to concentrate on the driving task, particularly if signs and speed limits have been observed.

The proposed digital display does not obscure any sightlines or interfere with the clarity of traffic signals, and in these circumstances, such a familiar urban feature would not constitute a potentially hazardous distraction to anyone exercising a reasonable standard of care. It is therefore considered that the proposed advertisement would not unduly distract highway users or raise concerns regarding public safety.

With regards to the static illumination, the proposal would not be significant in the street scene as the display would be located in close proximity to other sources of illumination and street lighting, which emit a considerably higher intensity of light.

A supporting document has been submitted with the application (**LL 102 A4 07**), which shows road traffic accident statistics from **Crash Map** for the area surrounding the application site over the five year period from 2014 to 2018. Crashmap have been developed by a very experienced team of collision analysts and road safety professionals with extensive experience of making road casualty data available to the public. The data provided by Crashmap has been accessed from the records of the Department for Transport. During this period, the road traffic statistics show that there have been no incidents recorded on the stretch of road approaching the application site in both directions. .

Industry research has shown that there is no material effect on highway safety when installing illuminated displays, provided that the images are only “static poster like displays”, and levels of illumination are controlled and monitored.

It is suggested that the matter relating to luminance levels can be controlled with the necessary planning conditions being applied to the site. The brightness will be controlled by light sensors to vary the brightness of the screen according to the brightness of the day. The light sensors will also ensure that the level of luminance of the advertisements is sensitive to the change in daylight from sunrise to sunset and from summer to winter. Taking the above matters into consideration, we conclude that the proposed illuminated advertisement is unlikely to have an adverse effect on highway safety.

Recent industry research has shown that there is no additional material effect on highway safety when installing digital displays, provided that the images are only “static poster like displays”, and levels of illumination are controlled and monitored.

It is considered that appropriate conditions are required to formally control the use of digital displays. In order to comply with the outdoor industry digital media code, there are suggested conditions that could be applied to the consent, (including the control of the luminance levels, frequency, and manner of change between images), to the satisfaction of the LPA.

In order to be consistent with these recommendations, we would propose that express advertisement consent should be granted subject to the following conditions:

Suggested Conditions

- The maximum level of illumination should not exceed 600cd/m² during daylight hours or exceed 300cd/m² during twilight and night hours (dusk until dawn), in accordance with the terms of the Institution of Lighting Professionals, Professional Lighting Guide 2015 recommendations for maximum luminance (cd/m²).
- The luminance level of the display should be controlled by ambient environmental control, which would automatically adjust the brightness level of the screen to track the light level changes in the environment throughout the day to ensure that the perceived brightness of the display is maintained at a set level

- The approved display should contain at all times a feature that will turn off the screen (i.e. show a black screen) in the event that the display experiences a malfunction or error.
- No individual advertisement on the LED screen will contain moving images, animation, intermittent or full motion video images, or any images that resemble road signs or traffic signals.
- There shall be a smooth uninterrupted transition from one image to another. Transitions shall be instantaneous, and no individual advertisement shall be displayed for a duration of less than 10 seconds.

The modernisation of the 'site' would not obscure visibility, distract highway users, hinder pedestrian or cyclist movement, and the above conditions would ensure that its continued use for the display of advertisements would not be detrimental to public safety.

Conclusions

For the reasons set out in this statement, it is considered that the proposed modernisation and subsequent display of static digitally produced advertisements on the 'site', (as opposed to the continued display of traditional poster advertising), would not be detrimental to public safety or visual amenity.

Accordingly, our application for express consent comprises electronic copies of the following documentation:-

Completed application form
 Planning letter statement (this document)
 Heritage Impact Assessment statement
 LL 102 A4 01 Location Plan at 1:1250
 LL 102 A4 02 Site Plan at 1: 500
 LL 102 A4 03 Existing Elevation 48s Display
 LL 102 A4 04 Proposed Elevation 48s Digital Display
 LL 102 A4 05 Google Street View March 2009
 LL 102 A4 06 Existing and Proposed 48 sheet Specifications
 LL 102 A4 07 Crash Map Statistics 2014 to 2018
 LL 102 A4 08 Site Photo 1994
 LL 102 A4 09 Express Consent 1994 sheet 1
 LL 102 A4 10 Express Consent 1994 sheet 2
 LL 102 A4 11 Rhyl Decision Notice

The relevant fee of £462.00 for the consideration of this advertisement consent application will be paid to Wrexham County Borough Council via The Planning Portal. I trust you will find the above application in order and look forward to receiving your acknowledgement in due course.

Should you require any additional information or clarification, do not hesitate to contact the undersigned.

Yours faithfully

Chris Welbourne
 Outdoor Advertising Services