

Our Ref: A118116-51 JOR

Neath Port Talbot County Borough Council
Civic Centre,
Port Talbot
SA13 1PJ

25 September 2020

Submission via the Planning Portal

Dear Sir/Madam

**PLANNING APPLICATION FOR CONVERSION OF POSTER ADVERTISEMENT DISPLAY TO D-POSTER.
NEATH ABBEY ROAD (A4230), NEATH, SA10 7DG
PLANNING PORTAL REFERENCE: PP-09102491**

Dear Sir/Madam,

Please find enclosed an application for advertisement consent to upgrade an established paper and paste advertising display to a modern digital format capable of being operated from a central location without the need to visit each site individually.

This is part of an industry wide drive to modernise and upgrade advertising infrastructure to meet modern requirements. It is proposed to replace the existing advertising display on a like for like basis, using new display technology that is lightweight, durable, efficient, and can be easily erected, as it is of a similar size and scale to the existing unit.

The Proposal

The proposal seeks to update the existing display at Neath Abbey Road (A4230), Neath, SA10 7DG with a digital equivalent which will display static advertisements on rotation.

The scheme will meet modern requirements of advertisers. This will bring a wide range of benefits as follows:

- Upgrade of sites lacking in investment;

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Registered Office:



- Reduction in vehicle trips for reposting adverts (i.e. from an average of 34 trips to 2);
- Consolidation and overall reduction in the number of advertising displays in the network;
- Eradicating the need to print posters and avoiding the associated waste involved in the production process;
- Ability to broadcast emergency messaging (e.g. public health messaging);
- Ability to use void periods for non-commercial campaigns;
- Opportunity for more creative real time and locally relevant advertising;
- Opportunity to integrate additional hardware to meet Smart City objectives.

Content will be controlled remotely in real time from a Networks Operation Centre (NOC) and the site will be monitored remotely 24/7 to facilitate responsive maintenance. Diagnostics software will report and resolve the majority of issues remotely.

The display would be limited to 300cd/m² at night time (on a full white display) in accordance with the Institute of Lighting Professionals (ILP) best practice guidance; *The Brightness of Illuminated Advertisements PLG05 2015*. Please note that the guidance distinguishes between daytime and night time illuminance, with a limit of 5,000cd/m² applied during the daytime. The level of illuminance will be set on site manually to be at an appropriate level for the area and to mimic the poster being replaced. Whilst the ILP guidelines will represent the upper limit, the actual level of illuminance in all likelihood will be well below this.

The following conditions have become established as best practice for roadside digital displays and will be applied to control the operation of the digital poster in the interests of amenity and public safety:

- Static images to be displayed only (no moving or flashing images);
- Changes between adverts to take place instantly with no sequencing, fading, swiping or merging of images;
- Maximum level of night time illuminance to be set to 300cd/m² in accordance with ILP Guidelines;
- Advertisements to change no more frequently than once every ten seconds.

Where circumstances demand, additional controls or variations of these conditions may be acceptable to the applicant. However, it would be expected that the Local Planning Authority present evidence based justification for deviating from the standard approach as any planning conditions imposed must meet the five standard conditions imposed by the Town and Country Planning (Control of Advertisement) Regulations 1992 (as amended).

The Site

The proposed site is a free standing advertisement board on Neath Abbey Road (A4230) which is not illuminated. The board is set back from the road behind a small incidental green space.

The site surroundings are mixed commercial/residential in nature. To the north is a heavily treed bank which separates the site from a residential area. To the east is an advertising board which fronts onto the Neath Abbey Road, again this board is separated from the residential area by a treed bank. This sign will be retained however not upgraded. To the south of the site is Tregelles Court site which includes the Neath Port Talbot County Borough Council offices and the Neath MOT Test Centre.

Further east is a large supermarket with associated car parking. To the west of the site is a residential dwelling, TH Williams Car Sales and dealership and the Smith Arms Public House, which is grade II listed.

The proposal site is an established location for advertising, having supported a D-Poster for at least ten years.

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 governments advertisement guidance for Wales and how it should be applied. In accordance with 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 upon 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 Neath Port Talbot County Borough Council Local Development Plan (2011-2026) adopted 2016. The Local Development Plan does have any specific policies in relation to advertising.

Planning Considerations

It is acknowledged by the applicant that the change in the type of illumination and the potential to increase the rate of change of the adverts would require express advertisement consent. The impact of these alterations has been considered in amenity and public safety terms as follows:

Amenity

On a strategic level, the digitisation of the advertising network will see an overall reduction in the number of advertising sites in the area. As the proposal seeks to replicate the existing advert and therefore mimic the existing situation, there will be minimal impact on the visual amenity of the surroundings. The size and positioning of the advertisement will remain the same and the level of illumination will reflect local and ambient conditions, with little material change to the site as it currently exists.

The existing board has been in situ for over 10 years and is an established part of the street scene. The proposed advertisement is very similar to what is on the existing site. The proposed D-Poster does not have a set level of illumination; it has a system of brightness control that will adjust to react to

ambient lighting levels throughout the day or night. The impact of the D-Poster will therefore be similar to that of the existing poster sign during the day and only marginally different at night time periods when the impact will be reduced due to the automatic dimming of the advertisement. The self-imposed controls proposed over the level of luminance, which will minimise light-spread, will ensure that this change does not cause material harm to amenity.

The controls proposed over the level of luminance at night are in line with the ILP Guidelines and industry best practice and will ensure that the proposed display does not cause any material harm to amenity. Additional controls over the display will be considered if necessary, to remedy a specific amenity concern. 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.

No properties will have a direct head-on view of the D-Poster. There is a property opposite Taillywd Road however due to the building orientation; the windows do not face onto the site. The occupiers of this property will have oblique views of the advertisement board if they look out of their windows, as they do with the existing poster-board. If time-limiting or luminance-limiting controls are necessary, the applicant will be happy to consider these, as we encourage a positive dialogue with the Council. Similarly, if a light-spill diagram is required to demonstrate the effect of the sign at particular luminance levels, we would be happy to request one from the applicant.

The D-Poster would be seen from the listed Smith Arms Public House however as the proposal seeks to "repost" the existing advert and therefore mimic the existing situation, there will be minimal impact on visual amenity during the daytime. The like for like replacement of the display and the control over operation seeks to ensure that the change in the visual impact of the site on the surroundings is not material.

The D-Poster will have no special effects, animation or movement which would increase its visual prominence within the local area or cause harm to the setting of the listed building.

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 an advertisement has already been established at this location, the Council must 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. 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 need to be evidence based and be specific to the location.

Travelling west along Neath Abbey Road, drivers will not see the sign. Road users travelling east along Neath Abbey Road, will have a head on view of the sign, however the sign will be viewed in mid and long views and therefore will not be a distraction to drivers. The long range visibility will ensure that drivers are able to easily assimilate the information on the display. The introduction of a sequential change will not have a material impact on the level of distraction as the changeover will be

instantaneous and not more frequent than once every 10 seconds. This will reduce the eye dwell time on the poster and therefore the potential for a distraction.

Vehicles travelling west along Neath Abbey Road will have views of the advertising board before, and as, they turn into Taillwyd Road. However, the junction is visible to approaching drivers from some distance away and the sign will not cause a distraction to drivers as they make this turn. Cars exiting Taillwyd Road onto Neath Abbey Road will see the sign however drivers would be fully capable of glancing content far in advance of the site without being distracted from the road or traffic conditions ahead. Drivers would be entirely capable of viewing the advertisement whilst maintaining stopping distances and an awareness of surrounding traffic movements.

Under these circumstances, such a familiar feature of The Neath Abbey Road (A4230) and surrounding highway network, would not constitute a hazardous distraction to anyone exercising a reasonable standard of care. Consequently, the proposal would not give rise to public safety issues, which would prevent the granting of an express advertisement consent.

Conclusion

For these reasons and the positive benefits set out above, 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 prepared by WYG;
- Letter Statement prepared by WYG (this letter);
- SHO-WAL-00003 PA_01 Site Location Plan;
- SHO-WAL-00003 PA_02 Existing Site Plan;
- SHO-WAL-00003 PA_03 Proposed Site Plan;
- SHO-WAL-00003 PA -04 Existing and Proposed Elevations;
- SHO-WAL-00003 PA -05 Existing and Proposed Elevations.

Additionally, we will arrange payment to Neath Port Talbot County Borough Council for the sum of £460 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.



Julie O'Rourke
Senior Planner