



23rd June 2023

Our Ref: 31871/A5/JK

Planning Portal Ref: PP-12260707

Neath Port Talbot County Borough Council
Development Control Section
The Quays
Brunel Way
Neath
SA11 2HZ

Dear Sir/Madam,

**TOWN AND COUNTRY PLANNING (CONTROL OF ADVERTISEMENTS) (ENGLAND) REGULATIONS 2007
LAND AT PARK AVENUE, NEATH, WALES, SA10 6RB
ERECTION OF D-POSTER ADVERTISEMENT**

Please find enclosed an application for advertisement consent to upgrade a long established paper and paste advertising display to a modern digital format, capable of being operated from a central location and significantly reduce vehicle trips for reposting.

The proposal is part of an industry wide drive to rationalise, modernise and update 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 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 ("the Applicant") is part of the Wildstone Group, and 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.

As landlords, 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 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 replace an existing paper and past advertising hoarding located on land adjacent to Park Avenue (A4230) in Neath with a D Poster which will display multiple static advertisements on rotation. The existing poster panel has been in situ for over 14-years, as demonstrated in **Appendix 1**, and is well located in commercial and planning terms. The development of sites of this type will facilitate the removal of less well-located sites elsewhere.

The proposal panel has the same dimensions as a standard 48-sheet hoarding, measuring 6m(w) x 3m(h) x 0.061m(d) and will be positioned 2.0m above ground, fronting onto land adjacent to Park Avenue. The proposed new display technology is lightweight, durable, efficient and can be easily erected with minimal engineering. In most instances, the erection of a D-poster can be achieved at a similar speed to traditional posting, with minimal structural work. The quality of the image produced will mimic that of a traditional poster, as illustrated at **Appendix 2**.

The proposed display will meet modern requirements and will be capable of displaying 6 advertising campaigns at a time, sequencing every ten seconds. 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, which will see an overall reduction in adverts, 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 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 obtained consent for over 700 consents for digital advertisements across the UK.

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.

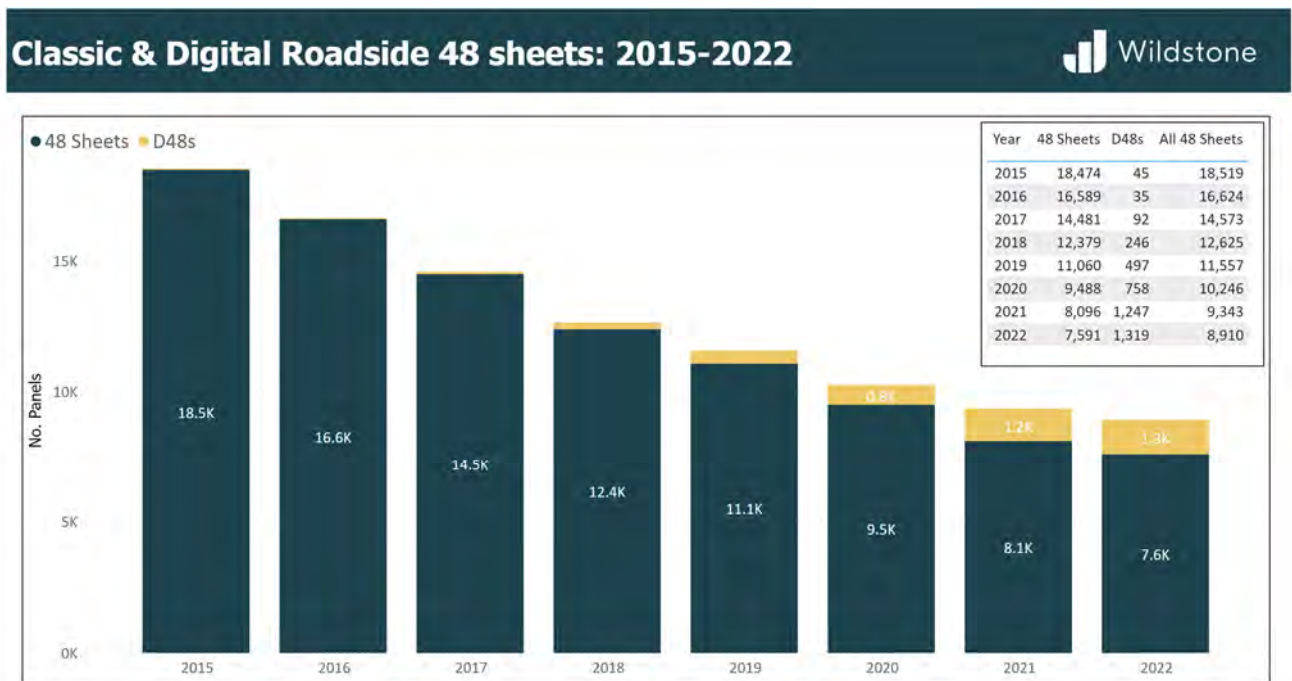


Figure 1: Reduction in 48-sheet advertising 2015-2022

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 in accordance with ILP Guidance during different times of the day are included at **Appendix 3** 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 are included within **Appendix 4** of this statement for clarity.

THE SITE

The proposal Site is land adjacent to Park Avenue and is visible from Park Avenue. It is an established location for advertising, having supported the billboard advertisement for over 14 years, as demonstrated at **Appendix 1**.

The Site’s immediate surroundings are predominantly mixed use in character. A large sub-station and a Car Centre Swansea (car dealership) is located immediately to the west. Residential properties occupy the land to the north, scrub land is located to the east and south as is the railway line.

The Site is located within the settlement boundary. It is not subject to any statutory landscape, environmental or historic designations.

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.

Planning Policy Wales (PPW, 2021) is the National Planning Policy for Wales. Technical Advice Notes (TANs) supplement PPW and give greater clarification. TAN 7 ‘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 should not stifle original designs or new display techniques*” (Paragraph 4) and confirms that outdoor advertisements can only be controlled in the interests of “amenity” and “public safety” (Paragraph 6). The guidance 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 development plan for the area currently comprises of the Local Development Plan 2016 to 2031 (adopted 2016). Section 3.0 provides strategic policies and Section 5.0 provides the topic-based development management policies. There are no policies directly relating to advertisements set out in the Local Plan nor are there any SPD guidance, however, Policies SP21 (Built Environment and Historic Heritage) and BE1 (Design) require that all development proposals must complement its local context, achieve a high quality standard of design and avoid unacceptable adverse visual impact on the local area and the amenities of neighbouring occupiers.

PLANNING CONSIDERATIONS

The proposal seeks to replace a longstanding 48-sheet advert with a new 48-sheet D-Poster display at the Site. The like for like replacement of the panel in terms of its size and location, and the control over operation, will ensure that the change in the visual impact of the Site on the surroundings is not material. The impact of the proposal has been considered in amenity and public safety terms as follows:

Amenity

The Site has been selected as an acceptable location for the proposed advertising in principle due to its longstanding existing use, limited visibility from residential properties and the presence of streetlights. The side-by-side comparison photograph on the D-Poster information sheet (**Appendix 2**) helps to illustrate the minimal difference between the existing type of display and the proposed replacement once appropriate controls are put in place, which ensure that a digital advertisement is not over illuminated. Depending on how the screen is illuminated it can be muted or appear more vibrant in locations where that might be more appropriate.

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 display will be controlled in line with best practice guidance to ensure that there will be minimal impact on the visual amenity during the daytime. At night, night-time illumination settings will ensure that the level of illumination is appropriate to the local area and is equivalent to a traditional externally illuminated advert, with a more even light spread. In accordance with the categorisations set out in the newly published ILP Guide PLG 05/23, it is agreed that the Site falls within Environmental Zone 4 (EZ4) and so as such, the maximum night-time luminance of the display should be set at 300cd/m². We therefore conclude that the Site can be considered

wholly appropriate in principle for advertising of this type. However, if the Council consider the residential context justifies further controls, our client would be willing to discuss matters further.

Public safety

Digital advertising is now a common feature in town centres and adjacent to major roads across the Country and there remains no casual 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.

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 proposal Site is located adjacent to Park Avenue. Drivers approaching the Site heading westbound will have the greatest visibility of the display. The cognitive demand on road users at this point is low. As such, it is considered that the proposal Site is in an uncomplicated location which drivers should be able to navigate with ease. Drivers would therefore be entirely capable of glancing at advertisements whilst maintaining stopping distances and an awareness of surrounding traffic movements.

Furthermore, according to crashmap.co.uk there have been no accidents on the approach to the site in the past 5 years indicating a very safe stretch of road.

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 biodiversity net gain where the site allows;
- Uplift in business rates to spend on public services;
- Reduction in vehicle trips and associated 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;
- 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 will not change the size, position or orientation of the existing advert, which benefits from deemed consent and has been in situ for many years and operated without issue. The established acceptability of the advertisement should not change materially with its conversion to digital subject to appropriate planning conditions to control the operation including the level of luminance of the digital display in the interests of amenity of road safe.

For these reasons and the positive benefits set out, it is considered that the application should be granted consent.

APPLICATION SUBMISSION

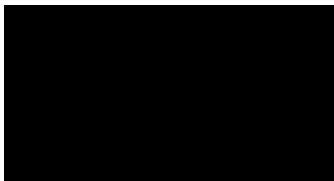
In order to complete the application, please find attached the following documentation:

- Completed application forms;
- Letter Statement (this letter);
- Architectural drawings including;
 - o 16639 | PA | 01 Site Location Plan
 - o 16639 | PA | 02 Existing Site Plan
 - o 16639 | PA | 03 Proposed Site Plan
 - o 16639 | PA | 04 Existing and Proposed Elevations

Additionally, we will arrange payment to Neath Port Talbot 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 in relation to any of the attached information, please do not hesitate to contact me.

Yours faithfully,



JUSTIN KENWORTHY

Planning Director

STANTEC UK LIMITED

APPENDIX 1

October 2008



July 2017

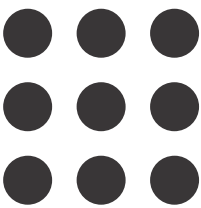


June 2022

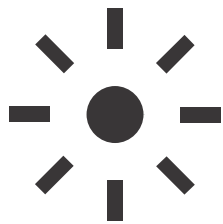


APPENDIX 2
D-POSTER INFORMATION SHEET

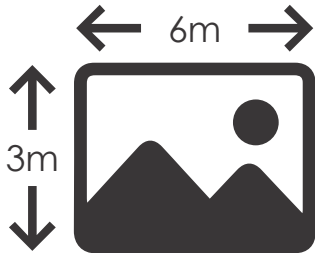
D-POSTER



High resolution LED display



Dimmable to 55 cd/m²
Embedded ambient light sensors to control brightness



Sized to match existing poster panels



Reduced depth of 60mm compared to traditional digital panel (300-600mm)

APPENDIX 3

EXAMPLE SITES OPERATING IN ACCORDANCE WITH ILP GUIDANCE DURING DIFFERENT TIMES OF THE DAY.



SALKAARA
AN DINING EXPERIENCE



Daytime Clear Skies



Twilight



Pitchford Steelstock
Tel: 01384 489030

Tomorrow
begins **Today.**



Clear Channel

Dusk



Night

Model Conditions

The following model conditions are as set out in Appendix 1 of the Institute of Lighting Professionals (ILP) Technical Note 5 “The Brightness of Illuminated Advertisements including Digital Displays” (PLG05/23).

The model conditions include the standard conditions set out in the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 [The Regulations].

The first condition relates to the standard time period of a consent, which unless otherwise specified should be five years, as set out on Part 3 of The Regulations. Please note, following the expiry of the time period an application would benefit from Deemed consent under Class 14 Schedule 3 of the Regulations. As set out in National Planning Practice Guidance (NPPG), conditions cannot be used to prevent the operation of Class 14 unless supported by specific and relevant planning considerations.

The second condition seeks to ensure that the application is implemented in accordance with the approved plans and application documents.

Conditions 3 to 7 represent the five “standard conditions” attached to all applications for advertisement consent, set out in Schedule 2 of the Regulations.

Conditions 7 to 13 are commonly applied to digital consents and have been standardised by ILP with reference to the updated guidance document.

These conditions can be adapted to suite the application proposal, with additional conditions added where they pass the standard tests set out in the National Planning Policy Framework (NPPF).

Time Period

1. The consent now granted is limited to a period of five years from the date hereof.

Reason: To accord with Schedule 2 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

Application Documents

2. The development shall be undertaken in strict accordance with the approved documents for this Advertisement Consent which comprise:

- Completed application forms;
- Letter Statement;
- Architectural drawings including;
 - o 16639 | PA | 01 Site Location Plan
 - o 16639 | PA | 02 Existing Site Plan
 - o 16639 | PA | 03 Proposed Site Plan
 - o 16639 | PA | 04 Existing and Proposed Elevations

Reason: To define the permission and for the avoidance of doubt and in the interest of

proper planning procedures.

Standard Conditions

3. Any advertisement displayed, and any site used for the display of advertisements, shall be maintained in a condition that does not impair the visual amenity of the site.

Reason: To accord with Schedule 2 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

4. Any structure or hoarding erected or used principally for the purpose of displaying advertisements shall be maintained in a condition that does not endanger the public.

Reason: To accord with Schedule 2 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

5. Where an advertisement is required under these Regulations to be removed, the site shall be left in a condition that does not endanger the public or impair visual amenity.

Reason: To accord with Schedule 2 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

6. No advertisement is to be displayed without the permission of the owner of the site or any other person with an interest in the site entitled to grant permission.

Reason: To accord with Schedule 2 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

7. No advertisement shall be sited or displayed so as to:

- a) Endanger persons using any highway, railway, waterway, dock, harbour or aerodrome (civil or military).
- b) Obscure, or hinder the ready interpretation of, any traffic sign, railway signal, or aid to navigation by water or air.
- c) Hinder the operation of any device used for the purpose of security, or surveillance, or for measuring the speed of any vehicle.

Reason: To accord with Schedule 2 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

Digital consents

8. There shall be no moving images, animation, video or full motion images displayed unless otherwise permitted by this consent.

Reason: In the interests of amenity and in order to retain effective planning control.

9. In the hours of darkness, the advertisement display luminance shall be no greater than 300cd/m² in accordance with the recommended maximum night time luminance value set out for Environmental Zone 4 in Table 10.4 within the Institution of Lighting

Professionals - Professional Lighting Guide (PLG 05) 'Brightness of Illuminated Advertisements including Digital Displays' (or its equivalent in a replacement guide) in cd/m².

Reason: In the interests of amenity, public safety and in order to retain effective planning control.

10. In daylight hours, the advertisement display luminance shall be controlled in order to reflect ambient light conditions (to ensure it is neither too bright or too dull), and shall at all times be no greater than the recommended maximum daytime luminance values set out in Table 10.5 within the Institution of Lighting Professionals - Professional Lighting Guide (PLG 05) 'Brightness of Illuminated Advertisements including Digital Displays' (or its equivalent in a replacement guide) in cd/m².

Reason: In the interests of amenity, public safety and in order to retain effective planning control.

11. Unless otherwise permitted, the minimum display time for each advertisement shall be 10 seconds and the advertisement shall not include any features which would result in interactive messages / advertisements being displayed.

Reason: In the interests of amenity, public safety and in order to retain effective planning control.

12. The interval between successive advertisements shall be no greater than 1 second and the complete display shall change without effect. The display to include a mechanism to default to a blank or black screen in the event of malfunction, or if the advertisement is not in use.

Reason: In the interests of amenity, public safety and in order to retain effective planning control.

13. No images displayed shall resemble official road traffic signs, traffic lights or traffic matrix signs.

Reason: In the interests of amenity and in order to retain effective planning control.