

Our Ref: JE/GM/93456

29 April 2025



Planning Services,
Planning and Economic Regeneration,
Newport City Council,
Newport,
NP20 4UR

**WILDSTONE ESTATES LTD
CONVERSION OF INTERNALLY ILLUMINATED POSTER TO DIGITAL DISPLAY
CHEPSTOW ROAD
PORTAL REFERENCE: PP-13971315**

Dear Sirs/Madam,

Please find enclosed an application for advertisement consent for the conversion of an existing paper and paste advertisement board to an internally illuminated digital display to be placed at the above site. The site has hosted an advertisement display since July 2008, which will be removed to allow for the installation of a modern digital poster, capable of being operated from a central location and significantly reducing vehicle trips for reposting. The proposed advertisement is 50% smaller than the existing sign, which would remain in place should advertisement consent for the replacement sign not be approved.

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.

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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 replace a freestanding 12m x 3m advertisement with a much smaller 6m x 3m modern internally illuminated digital sign (D-Poster) along the B4237 (Chepstow Road). The site has hosted a freestanding hoarding since 2008, and has remained since, as evidenced in **Figure 2**.

The proposed panel has the same dimensions as a standard 48-sheet hoarding, measuring 6m(w) x 3m(h) x 0.1m (d) and will be positioned 2.25m above ground. The proposed D-Poster will display multiple static advertisements on rotation. 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 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.

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Classic & Digital Roadside 48 sheets: 2015-2022

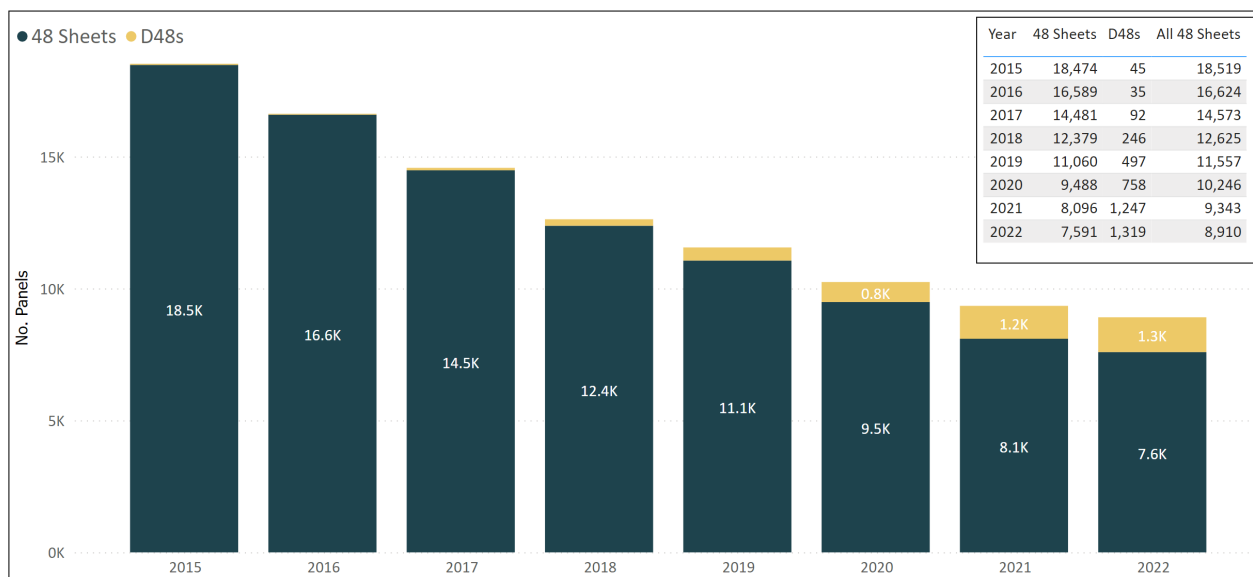


Figure 1 – Reduction in 48 sheet advertising 2015-2022

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. A summary of the above proposal can be found in **Appendix 4**, submitted with this application.

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.

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The Site

The proposed digital advertisement will be located on land adjacent to the B4237 carriageway, where the existing freestanding advertisement is located, as shown in **Figure 2** below. The immediate surroundings encompass residential dwellings and a railway bridge. The proposed D-poster will sit opposite a row of three storey, semi-detached dwellings. The main railway line into and out of Newport can be found directly north of the site, which is separated from the site by a buffer of trees and hedgerows. Beyond the railway line are additional residential properties.



Figure 2: the site in July 2008, Source: Google Street View

Owing to the billboard having been in place for over 15 years, the site is well established to host an illuminated advertisement. The sensitive frontages are separated by the B4237 (Chepstow Road), which is a major road. In accordance with the categorisations set out in the newly published ILP Guide PLG 05/23, the proposal would be classified as within Environmental Zone 3 (Sub-urban). Up until around 2017, the existing 12m wide poster display was externally illuminated by means of an external lighting bar.

The site is not within proximity to national and local heritage assets. It also not based within or in close proximity to a conservation area.

Digital advertisements are not an uncommon feature in Newport. In April 2021 (ref: PP-09539691) 2no. freestanding 6.4m x 3.4m digital advertisements located on West Llangland Way, were granted consent in April 2021 and are shown in **Figure 3**. The advertisements are of a similar nature as the one being proposed in so much that it shows static images on rotation for a period of 10 seconds.

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Figure 3: Digital advertisement (ref: PP-09539691) granted consent April 2021, Source: Google Street View.

Planning Policy

The development plan for Newport consists of the Newport City Local Development Plan, adopted in January 2015. Policy GP6 (paragraph 3.43), states that in considering applications for signs and advertisements, regard will be given to guidance set out in TAN7: Outdoor Advertisement Control (1996) and TAN 12: Design (2014).

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).

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TAN12 'Design', states "The degree to which signs are appropriate to their context is a critical consideration", in terms of its design.

Planning Considerations

The proposal seeks to replace an aging advertisement display with a modern digital panel that has the capability to control light levels appropriately. Essentially the proposal should be considered a replacement of the previous sign in terms of size, location and orientation. The impact of the proposal has been considered in amenity and public safety terms as follows:

Amenity

The proposed signage will be located in an established location for an advertisement of this scale, with the existing billboard being in place for at least 15 years. The proposal seeks to replace an aging paper and paste panel, 12m x 3m, with a 48-sheet D-Poster, 6m x 3m. When the proposed digital panel is compared to the existing display, the new D-Poster is significantly smaller, and of a more modern design. The proposal therefore represents an opportunity to significantly reduce the amount of advertising space at the site.

D-posters have enhanced capabilities to control levels of brightness to ensure that the display is never overly illuminated and appears as a paper and paste display. The proposed display will be an improvement to what is currently in place on the site with an improved design. The illumination in the D-Poster is controlled by sensors that gauge the ambient conditions to ensure that the digital display does not appear overly bright. Ambient lighting conditions change over the course of the day and the sensors within the display can measure and adjust the illumination of the poster accordingly.

In accordance with the categorisations set out in the recently 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 urban environment.

The proposed advertisement will not be detrimental in the immediate or wider sense. There are no heritage assets or conservation areas within close proximity to the site. The street is already well lit with streetlamps, with the hoarding being located directly under a lamp. It should be highlighted that if this application is refused, then the fallback position is that the existing poster will remain in place. Owing to the significant reduction in size of the advertisement, we consider that the proposed D-Poster will have a positive effect 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. As an advertisement board already exists in this location, the Council should 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.

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.

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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. 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 proposed display would occupy the same position as the current hoarding, which ensures that sight lines are maintained, and visibility of traffic signage remains unchanged. The sign will be primarily viewed by those who are travelling southeast on Chepstow Road, a well-lit B-road with excellent forward visibility. Drivers would be entirely capable of glancing at advertisements whilst maintaining stopping distances and an awareness of surrounding traffic movements. The cognitive demand on road users at this point is minimal as there are no unusual highway complexities which would require extra care to be taken.

The controls in place on the digital advertisement ensures that drivers will not be dazzled by the display as it will be statically illuminated at all times. The sensors in the poster 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 will distract drivers.

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. Advertisements will present as still images with not 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.

Owing to the above, the replacement of the existing illuminated display for a D-Poster 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.

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 associated noise, air quality and climate considerations;
- Removal of multiple advertising sites and panels and reduction in clutter;

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- 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 replace a dated hoarding with a modern digital screen which is just half the size of the existing posterboard. The immediate neighbourhood has already demonstrated that it is an appropriate setting for an illuminated advertisement. The position, scale and orientation of the advertisement will match that of the current billboard, albeit at a reduced width.

Owing to the billboard having been in place for over 15 years the site is well established to host an illuminated advertisement. The existing sign will remain in place should advertisement consent not be forthcoming. The proposed sign improves the amenity of the area and has no impact on public 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 – Site Specific Information Sheet
- Architectural drawings including;
 - 23529/PA/01 Site Location Plan
 - 23529/PA/02 Existing Site Plan
 - 23529/PA/03 Proposed Site Plan
 - 23529/PA/04 Existing and Proposed Elevations

Additionally, we will arrange payment to the Newport 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,

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A handwritten signature in black ink, appearing to read 'Joby Errington'.

Joby Errington
Planner

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