

Our Ref: JW/GM/93456

10 July 2023



Planning Services
Manchester City Council
PO Box 532
Manchester
M60 2LA

BY EMAIL ONLY

Dear Sir/Madam

**TOWN AND COUNTRY PLANNING (CONTROL OF ADVERTISEMENTS) (ENGLAND)
REGULATIONS 2007
CONVERSION OF POSTER ADVERTISEMENT TO D-POSTER
LAND AT 166/170 WILMSLOW ROAD, MANCHESTER, M14 5LG**

On behalf of our client, Wildstone Estates Limited, please find enclosed an application for advertisement consent to upgrade a long established 48-sheet paper and paste advertising display to a modern digital format, capable of being operated from a central location and significantly reducing vehicle trips for reposting.

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 number 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.

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

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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 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 longstanding 48-sheet poster and paste advertisement display on land to the west of Wilmslow Road, Manchester with a digital poster display ('D-Poster') of the same size which will display multiple static advertisements on rotation.

Photographic evidence of the site, utilising Google Streetview records, demonstrates that the existing display on the site has remained in place since at least October 2008. The existing advertisement panel therefore benefits from deemed consent under Class 13 of Schedule 3 Part 1 of the Advertisement Regulations having been in situ for over ten years.

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 3.4m above ground (to the base of the panel). The proposed new display technology is lightweight, durable, and 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 as illustrated in the enclosed D-Poster Information Sheet (**Appendix 1**).

The proposed display will meet modern requirements and will be capable of displaying six 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, which will see an overall reduction in adverts, as multiple advertising campaigns can be supported by single panels. In some cases, 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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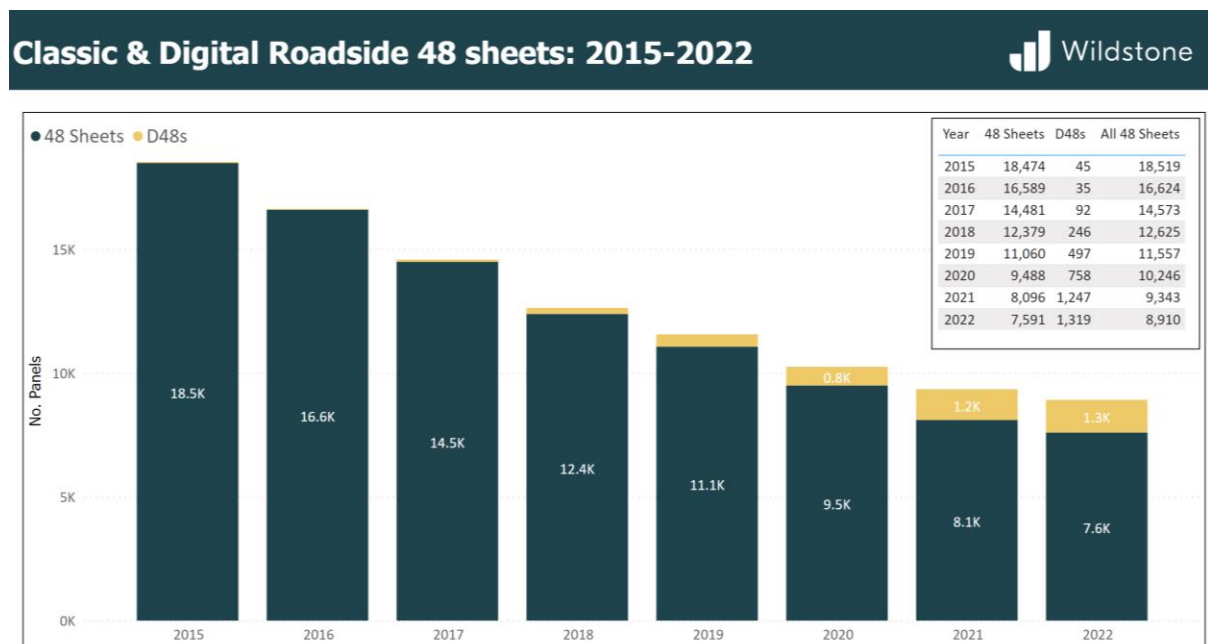


Figure 1: Reduction in 48-sheet advertising 2015-2022

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.

Conditions

All advertisements are subject to the five standard conditions set out in the Advertisement 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.

The Site

The proposal site comprises land at 166/170 Wilmslow Road, Manchester, M14 5LG. It is situated at the roadside, on the western side of Wilmslow Road. The proposal site is an established location for

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advertising, having supported two advertisement hoardings since at least October 2008 (source: Google Streetview records).

It is proposed to replace the existing southeast facing poster and paste advertisement display with a D-Poster. As identified on the submitted plans, the existing northeast facing D-Poster on the site will remain in position. In this regard, it is noted that the Council granted consent on 30/12/2015 for the installation of the northeast facing D-Poster on the site (LPA ref: 110502/AOH/2015/S1) which replaced a poster and paste hoarding which was previously in place.

In the immediate context, the proposal site lies in proximity to a number of commercial and retail units along Wilmslow Road. The proposed D-Poster, mirroring the existing signage to be replaced, is positioned such that it will not face and dwellings in close proximity.

The street scene is characterised by a plethora of advertisement signage along Wilmslow Road, commensurate with the mix of commercial and retail uses. These include Charles Wilson Auto Engineers, Ash Residential Estate & Letting Agents, LETBIT Estate Agents, Bellucci Brothers Estate Agents to name a few.

The site is not subject to any heritage asset designation, nor is it located in close proximity to any statutory designated heritage asset.

The site is situated within the defined Rusholme District Centre.

This sets out the position of the proposal site and immediate vicinity in that it is an established area for advertisement signage, including a D-Poster. It is noted that the proposal seeks to only upgrade and digitise an existing lawful display and would not further intensify the area in this regard.

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 provisions of the development plan, in so far as they are material, in addition to any other relevant factors.

The National Planning Policy Framework 2021 ('NPPF') sets out the Government's planning policies for England and how these are expected to be applied. In accordance with paragraph 136 of the NPPF, advertisements should be subject to control only in the interests of amenity and public safety, taking into account cumulative impacts.

As described in the National Planning Practice Guidance ('NPPG'), the regime is 'lighter touch' than the system for obtaining planning permission for development. The NPPG also clarifies that a local plan does not have to contain advertisement policies and that if such policies are considered necessary to protect the unique character of a particular area, these should be evidence-based.

This application has regard to the policies and objectives of the Development Plan; specifically to the LPA's Core Strategy and 'saved' Policy 15 of the Unitary Development Plan which concerns 'Advertisements, Hoardings and Posters'.

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Planning Considerations

The proposal seeks to replace a longstanding poster and paste advertisement display with a digital poster display ('D-Poster') of the same size which will display multiple static advertisements on rotation. The proposed southeast facing D-Poster will visually mirror the existing northeast facing D-Poster

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 below.

Amenity

The proposal seeks to replace the existing 48-sheet advertisement display at the site with a D-Poster of the same size and orientation. The proposed works will see replacement of the dated billboard on the site with a modern digital screen. As such, it is considered this will have no impact on visual amenity. The level of illumination of the proposed D-Poster will be set to ensure that the proposed advertisement is not visually materially different from the existing position.

The side-by-side comparison photograph on the enclosed D-Poster Information Sheet (**Appendix 1**) 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. Moreover, **Appendix 2** provides visual examples of D-Posters operating in different light conditions, throughout different times of the day to illustrate the acceptability of the proposal in how this will sit in the street scene.

The context of the surroundings including the existing northeast facing D-Poster on the site, approved by the Council in 2015 (LPA ref: 110502/AOH/2015/S1) establishes this as an appropriate location for an illuminated advertisement of the type proposed. The proposed D-Poster will visually mirror the existing D-Poster on the site with no material visual impact in this regard.

The position and orientation of the proposed signage is such that there are no sensitive receptors facing the signage, mimicking the established position of the poster and paste hoarding which will be replaced.

During the day, the proposed level of illuminance will be set to mirror that of a traditional poster and paste board, in line with the current position of the site. At night-time, the controls proposed over the level of luminance, as set out in **Appendix 3**, along with the orientation of the D-Poster will ensure that the proposal will give rise to no material harm to amenity.

When considering the merits of the proposed digital advertisement board, it is important to note that should consent not be forthcoming, the fall-back position amounts to what already exists on the site which constitutes a lawful 48-sheet poster and paste billboard. The principle of the proposed use is therefore already established, and the current poster board would remain in situ should the proposed digitalisation not be approved.

Consideration should only therefore be given to the replacement of the existing advertisement board and any impacts this would bring. Visually, it is considered that this will have no material impact on the street scene and sufficient control will be in place to ensure there is no detrimental impact on amenity when compared to the current lawful position.

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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.

Given the nature of the site and surrounding area and the presence of other signage in the immediate context, there would be little, if any, material change in the appearance of the street scene. The existing advertisement display at the site has been in place for over 14 years and constitutes a well-established feature of the street scene. The proposed replacement D-Poster would have no impact on the street scene when considered in this context, would cause no cumulative increase in advertisement signage and sit comfortably in the visual context while not harming amenity, the qualities of the site, or the character or appearance of the wider area.

Under these circumstances, the proposal to replace the 48-sheet poster and paste advertisement display on the site with a D-Poster will give rise to no unacceptable impact with regard to amenity and is in accordance with national and local plan policy.

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 advertisement signage 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. 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 at the roadside across the country. There are now over 1,300 digital 48-sheet advertisement displays across the UK, operating without issue in a wide variety of roadside environments. There remains no causal evidence that digital advertising 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 with or confuse with other traffic signs or signals.

The content shown on the proposed D-Poster is a matter for advertisers to determine and is governed by market forces and well-tried advertising methods. However, it can generally be said that any advertising content has to be quickly and easily understood and disseminated by any person passing the signage for this to be effective. The nature of roadside advertising ensures that content presented to highway users would be simple and easily absorbed/processed. The market forces dictate that any advertisement display should ideally contain no more than 7 – 10 words to be effective, or less, if possible, to best convey its message. In this regard, any content features on the proposed D-Poster would be simple and easily processed by passing motorists.

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 proposed D-Poster would primarily be seen by traffic travelling north along Wilmslow Road, which is well lit, level and has excellent forward visibility. Road users would be fully capable of glancing

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content far in advance of the site without being distracted from the road or traffic conditions ahead and would be entirely capable of viewing advertisements whilst maintaining stopping distances and an awareness of surrounding traffic movements. This is consistent with the existing position.

Replacement of the existing signage with a D-Poster is considered to have no material impact on the level of distraction caused to any road users such that it would have the potential impact on highway safety. It should be noted that drivers are almost always continually assimilating sensory inputs from multiple sources whilst driving. It is not considered that the presence of the proposed D-Poster at the site would represent a material departure from the types of features that drivers are used to seeing at the roadside. The proposal would therefore not appear as an incongruous feature.

It is reiterated that the Council have established that a D-Poster is acceptable on the site, in granting consent for the existing northeast facing D-Poster on the site in 2015 (LPA ref: 110502/AOH/2015/S1).

The introduction of a sequential change in the adverts 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 eye dwell time on the D-Poster and therefore the potential for a distraction is low. In this regard, free flowing traffic along Wilmslow Road will see most road users pass the sign without seeing a sequential advert change and in times of stop-start traffic, road users will be travelling very slowly or stationary. The introduction of a sequential advert change on the signage at the site is therefore considered to pose no increase in risk to highway safety.

Under these circumstances, such a familiar feature of the 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. As is in accordance with national and local planning policy.

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 design;
- 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;
- 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 associated with the proposal that will not be achieved by maintaining the status quo.

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Conclusion

The existing 48-sheet poster and paste advertisement display on the site benefits from deemed consent and is a well-established feature of the street scene. The existing northeast facing D-Poster, approved by the Council in 2015 (LPA ref: 110502/AOH/2015/S1) will remain in position, with the southeast facing poster and paste display being converted to a D-Poster.

The proposal will not change the size, location or orientation of the existing advertisement display on the site, which benefits from deemed consent and has been in situ for many years and operated without issue. The established acceptability of the existing display should not change materially with its conversion to a D-Poster subject to appropriate planning conditions to control the operation including the level of luminance of the D-Poster in the interests of amenity and road safety.

Given the nature of the site and surrounding area and the presence of other signage in the immediate context, there would be little, if any, material change in the appearance of the street scene. The existing advertisement display at the site has been in place for over 14 years and constitutes a well-established feature of the street scene. The proposed replacement D-Poster would have no impact on the street scene when considered in this context, would cause no cumulative increase in advertisement signage and sit comfortably in the visual context while not harming amenity, the qualities of the site, or the character or appearance of the wider area. Moreover, in accordance with the proposed controls, the introduction of a D-Poster on the site would give rise to no adverse impact with regard to public safety.

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

Application Submission

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

- Completed application forms;
- Letter Statement (this letter);
- Appendix 1 – D-Poster Information Sheet
- Appendix 2 – D-Poster Example Sites
- Appendix 3 – Model Conditions
- Architectural drawings:
 - 9184/PA/01 Site Location Plan;
 - 9184/PA/02 Existing Site Plan;
 - 9184/PA/03 Proposed Site Plan; and
 - 9184/PA/04 Existing and Proposed Elevations.

Additionally, we will arrange payment to the Council to cover the cost of the Advertisement Consent application.

I trust 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 enclosed information, please not hesitate to contact me.

Yours faithfully

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A handwritten signature in black ink, appearing to read "Jamie Wilton".

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encs: see above