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Your ref:
Our ref: 15148

Planning
Manchester City Council
P O Box 532
Manchester
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14 May 2024

Dear Sir / Madam

**TOWN AND COUNTRY PLANNING (CONTROL OF ADVERTISEMENTS) (ENGLAND)
REGULATIONS 2007
371 OLDHAM ROAD, MANCHESTER, M40 8BA: CONVERSION OF POSTER
ADVERTISEMENT DISPLAYS TO D-POSTER**

Please find enclosed an application for advertisement consent to upgrade a long established paper and paste advertising displays 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 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.

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 Proposed Development

The proposal seeks to replace two longstanding externally illuminated poster displays at 371 Oldham Road, Manchester, M40 8BA, which includes one 96-sheet and one 48-sheet displays, with two freestanding digital D48 poster displays (D-poster) which will display multiple static advertisements on rotation, resulting in a 33% reduction when compared with the existing situation.

The existing poster panels benefit 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 panels have the same dimensions as a standard 48-sheet hoarding, measuring 6m(w) x 3m(h) x 0.1m(d) and will be both positioned 2m above ground. 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 displays 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 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 gained consent for over 700 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.

Classic & Digital Roadside 48 sheets: 2015-2022

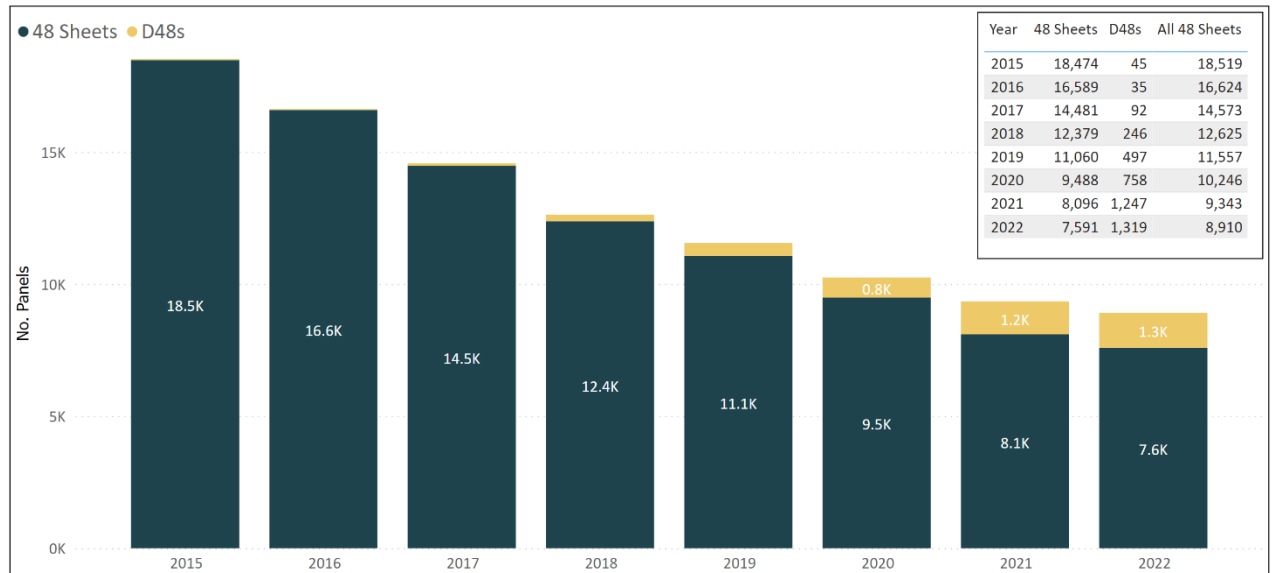


Figure 1 - Reduction in 48 sheet advertising 2015-2022

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 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 is located at Land At 371 Oldham Road, Manchester, M40 8BA.

The proposal site is an established location for advertising, having supported an advertisement on site since at least May 2011 and 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 site surroundings are a mix of industrial and commercial in character, populated with warehouse buildings, a concrete and aggregates plant, car parks and ground floor retail units. The nearest residential properties are located at the top floors along Oldham

Road, which is approximately 64m to the southeast of the Site (at the closest point). However, the display does not overlook the properties, given the orientation of the proposed display, and the highway in-between, and we therefore consider the proposal will have no impact on neighbours.

The Site is located at the gateway of the designated Central Park Strategic Employment Location and Regional Centre to the east, and on the approach to the business and commercial allocation at Oldham Road Goods Yard to the west (ref: HC 10c), where the advertisement as proposed should be positioned.

The Site does not contain or adjoin a Conservation Area and heritage assets.

The Site is in a location where advertising of this type would typically be found. There are other smaller advertising displays in the vicinity, most of which are associated with industrial and commercial buildings in the area. There are other poster advertisements in the locality including the approved consent for a digital display at 622 Oldham Road (ref: 128430/AOH/2020), which is 50m southeast along Oldham Road. Another scheme was allowed at appeal at 628 Oldham Road (ref: 133126/AOH/2022), which is appropriately 77m southeast along Oldham Road. As such, the proposed display in a similar context should be considered acceptable.

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 4 (Urban).



Figure 2 – Google Street View image of the Site (August 2023)

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.

The National Planning Policy Framework 2023 (NPPF) sets out the government's planning policies for England and how these are expected to be applied. In accordance with Paragraph 141 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 a “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.

The Development Plan for the area consists of Core Strategy (adopted 2012), saved policies of the Unitary Development Plan (saved 2012) and the Places for Everyone Plan (adopted 2024). The Council does not have any specific policies in relation to advertising.

Planning Considerations

The proposal seeks to upgrade two poster displays at 371 Oldham Road, Manchester, M40 8BA, including one 96-sheet and one 48-sheet displays, with two freestanding D48 digital poster displays (D-poster).

The proposal seeks to “repost” the existing externally illuminated display with a “D-poster” which will display multiple static advertisements on rotation. The remaining existing displays are to be removed as part of the proposals resulting in a 33% reduction when compared with the existing situation.

The replacement of the panel in terms of its orientation and position, 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 advertising in principle due to the industrial and commercial context. Within the adopted Development Plan, the Site is located at the gateway of the designated Central Park Strategic Employment Location and Regional Centre to the east, and on the approach to the business and commercial allocation at Oldham Road Goods Yard to the west (ref: HC 10c), where the advertisement as proposed should be positioned.

The display will be controlled in line with best practice guidance to ensure that there will be minimal impact on visual amenity during the daytime. At night, the 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.

The side by side comparison photograph on the 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. Depending on how the screen is illuminated it can be muted or appear more vibrant in locations where that might be more appropriate.

A recent appeal decision on a site in Manchester confirmed the agreement of PINS that *“the quality of the static illuminated image which would be produced by the appeal proposal would adequately mimic a traditional externally illuminated poster board so as not to present as an alien feature”* (Appeal Ref: APP/B4215/Z/22/3303626: Land to the north of Thompson Street, M4 4BW.)

The nearest residential windows are 64m away. However, given the orientation of the proposed display and the highway in-between, the neighbouring residential units would not be impacted by the illuminance of the signage. In accordance with the categorisations set out in the newly published ILP Guide PLG 05/23, the maximum nighttime luminance of the display should be set at 300cd/m2 and this can be controlled by a suitably worded condition.

We are aware of a similar proposal at 628 Oldham Road (ref: 133126/AOH/2022), which was refused by the Council due to the proliferation of hoarding displays in this location but later allowed at appeal. However, despite its close relationship to the application Site, it is considered that the site specific considerations do not apply to this proposal by virtue of the proposed 33% reduction in advertisement, the presence of the existing

panels for over ten years, and the absence of other advertisement displays along the streetscene where the proposals are situated.

The context of the surroundings, including other illuminated (both internally or externally) display adverts, street lighting, and floodlighting at warehouse buildings, the concrete and aggregates plant, and carparks. There are other consented advertisements in the vicinity of the Site including the approved consents for digital displays at 622 Oldham Road (ref: 128430/AOH/2020) and at 628 Oldham Road (ref: 133126/AOH/2022). Within both Officer Reports, it is confirmed that the Site's location, scale, height and format would have no impact on the visual amenity of the locality.

The proposals proactively improve and upgrade the Site through a 33% reduction in advertisement, and it can therefore be concluded that there would be a positive impact upon visual amenity.

As such, the proposal would not be detrimental in either an immediate or wider sense.

Public Safety

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.

Digital advertising is now a common feature in town centres and adjacent to major roads across the Country and 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.

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 in an uncomplicated location which drivers should be able to navigate with ease. It would be visible by traffic travelling west along Oldham Road and north along Hulme Hall Lane, which are both limited to 30mph, level, well-lit and has excellent forward visibility. The cognitive demand on road users at this point is low as there are no unusual highway complexities which would require extra care to be taken. Given the long-range visibility and the proposed setback position from the boundary, drivers will be able to easily assimilate the information on the display. As the advertisement has been in situ for at least 12 years without any public safety concerns being raised, we consider that the proposed display would not conflict with the signalised junction.

Furthermore, according to crashmap.co.uk there have been 11 accidents on the approach to the site in the past 5 years (all of which was clarified as 'slight' saved for one 'severe'). However, given that there is no evidence to suggest that the existing advert has directly contributed to past accidents, and that there is no evidence that a static digital advertisement display is any more distracting than a paper and paste advert, it is not considered that the scheme would result in significant visual distractions to motorists using the surrounding road networks. As such, the proposal should be considered acceptable.

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;
- 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 proposals proactively improve and upgrade the Site through a 33% reduction in advertisement and it can therefore be concluded that there would be a positive impact upon the local area.

The proposal will not change the 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 or road safety.

The proposal will be located on an industrial and commercial character area in a position where advertising of this type is commonplace. The proposed conditions to control the luminance of the screens and the operation of the digital screens will ensure that there is no adverse impact on amenity or road 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);
- Architectural drawings including;
 - 15148-OS-PLANNING-FINAL-PDF (1) Site Location Plan
 - 15148-OS-PLANNING-FINAL-PDF (2) Existing Site Plan
 - 15148-OS-PLANNING-FINAL-PDF (3) Proposed Site Plan
 - 15148-OS-PLANNING-FINAL-PDF (4) Existing and Proposed Elevations

Additionally, we will arrange payment to the 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

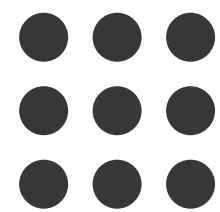
A handwritten signature in black ink, appearing to be 'Amon Yiu', with a stylized, cursive script.

Amon Yiu
Graduate Planner

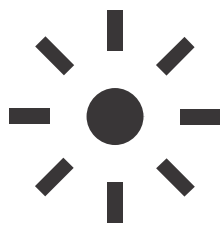
E: amon.yiu@carterjonas.co.uk
T: 020 7062 3114
M: 07799 772358

APPENDIX 1 – D-POSTER COMPARISON

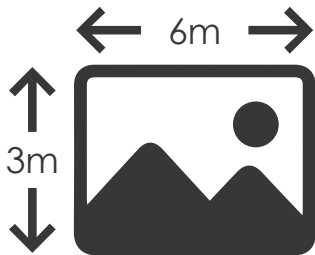
D-POSTER



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



Daytime Clear Skies



FREE RANGE

Liz Rygh
Liz Rygh: Magnificent by the Book
(H. Martin, 2020)
London College of Communication
B&W.com
© B&W

Illustrated by the author of 2020
in partnership with Clear Channel
Illustration

Clear Channel



GET SHARP

Daytime Overcast



Twilight



Pitchford Steelstock
Tel: 01384 489030

Tomorrow
begins **Today.**

40

Dusk



Night

APPENDIX 3 – MODEL CONDITIONS IN TECHNICAL NOTE 5 “THE BRIGHTNESS OF ILLUMINATED ADVERTISEMENTS INCLUDING DIGITAL DISPLAYS” (PLG05/23)

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:
 - 15148/PA/01 Site Location Plan
 - 15148/PA/02 Existing Site Plan
 - 15148/PA/03 Proposed Site Plan
 - 15148/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.

APPENDIX 4 – SITE SPECIFIC INFORMATION SHEET

Appendix 4**Application for Advertisement Consent: Proposal Factsheet**

URN: 15148

Site Name: 371 Oldham Road, Manchester, M40 8BA

Planning Portal Reference: PP-13053388

Advertising Type	<i>Digital</i>
Size of Advertisement (HxWxD)	<i>6m(w) x 3m(h) x 0.1m(d)</i>
Number of Panel	<i>2</i>
Max Daytime Illumination <i>(to be adjusted based on application)</i>	<i>Up to 5,000 cd/sqm (Brightness will vary during daylight hours based on ambient brightness (ie brighter on a cloudless summers day than overcast winters day)</i>
Max Night-time Illumination <i>(to be adjusted based on application)</i>	<i>300cd/sqm</i>
Notes	<i>Brightness adjusted by a light sensor backed by a light table</i>