

Our Ref: EJ/GM/93456

24 November 2023



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

BY PLANNING PORTAL (PP-12617615)

**WILDSTONE GROUP LIMITED
ADVERTISEMENT CONSENT FOR REPLACEMENT OF 3NO. POSTER ADVERTISEMENT
DISPLAYS TO 1NO. D-POSTER
BARLOW ROAD, MANCHESTER, M19 3HF
PLANNING PORTAL REFERENCE: PP-12617615**

Dear Sir/Madam

Please find enclosed an application for advertisement consent for the replacement of 3no. poster advertisement displays to 1no. D-Poster. The application includes the removal of 2no. posters and upgrade of the long-established 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. The proposal results in a 66.66% reduction in overall advertising space at this location.

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

The Applicant, Wildstone Group Limited, is 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.

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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 the 3no. existing longstanding poster displays, at Barlow Road, Manchester with 1no. freestanding digital poster display (D-poster) which will display multiple static advertisements on rotation.

The existing poster panel 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 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. An example site at **Appendix 1** illustrates what a typical replacement panel would look like, alongside its former paper counterpart.

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 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.

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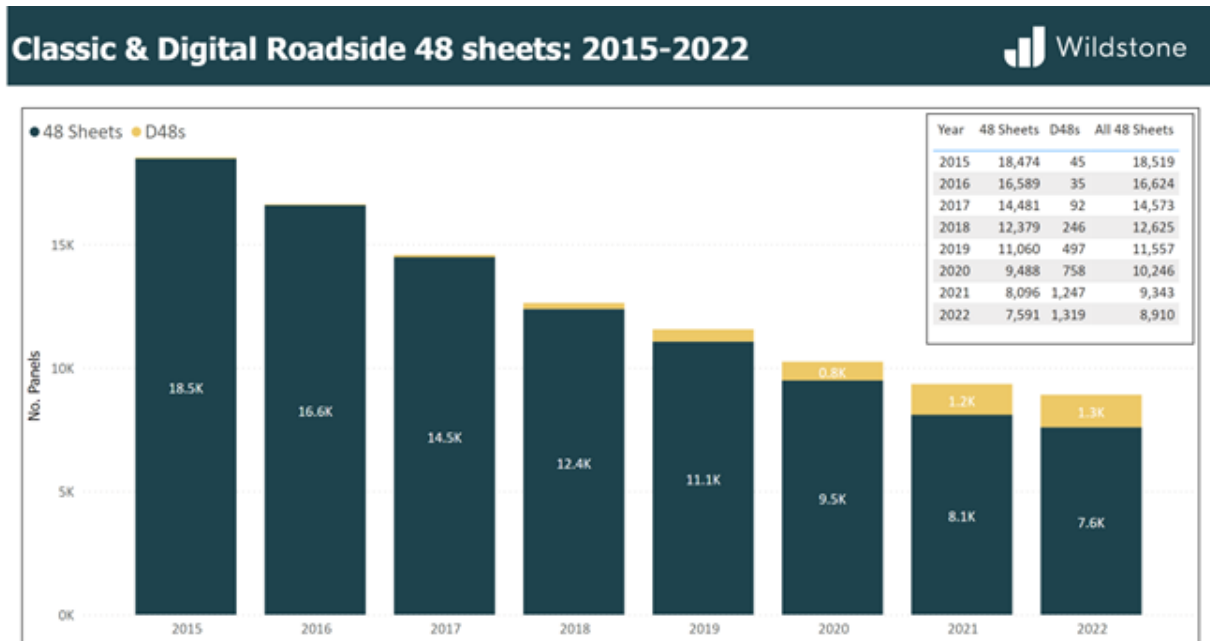


Figure 1 - Reduction in 48 sheet advertising 2015-2022

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 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 are included within **Appendix 3** of this statement for clarity.

The Site

The proposal site is located on the south side of Barlow Road, Manchester. The three advertisement hoarding are predominately visible to those travelling east along Barlow Road. The site surrounds are predominately mixed in character.

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The proposal site is an established location for advertising, having supported three poster and paste advertisements on site since September 2008 (as shown in Figure 2).



Figure 2 – September 2008 Google Street View of the Site

The surroundings of the area are mixed in nature. The site faces north onto Barlow Road, beyond this is Greenbank Playing Fields. To the west of the site is a public house (the Bluebell Inn). To the south of the site is a builder's yard that appears to be used for the sale and storage of tyres, and to the east of the site are residential dwellings. The site is not within a Conservation Area, nor is it within close proximity of a Listed Building.

The site is in a long-established location for advertising, Figure 3 shows the site as of September 2023.



Figure 3 – September 2023 Google Street View of the Site

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 (Suburban).

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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 136 of the National Planning Policy Framework (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 Manchester consists of constitutes the Manchester Core Strategy (adopted July 2012) and the Extant Unitary Development Plan (adopted 1995, containing city-wide and local area policies not replaced by the Core Strategy).

Policies DC15.1 and DC15.2 of the Unitary Development Plan concern advertisements, hoardings and posters.

Planning Considerations

The proposal seeks to replace 3 no. existing longstanding poster displays with 1no. freestanding D-Poster which will display multiple static advertisements on rotation. It will equal to a 66.66% reduction in total advertising space and would be a like for like replacement of the right-hand 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 proposed signage will not cumulatively increase the number of advertisements in the area, nor will it contribute to any additional clutter to the street scene. The proposals will remove two thirds of advertisements by removing the three existing poster displays and replacing them with a single freestanding D-Poster.

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.

The acceptability of the proposal should be assessed in the context of the displays currently in place. The proposed display will replace one of the existing displays on a like for like basis, although shifting from a paper and paste display to internally illuminated. The side-by-side comparison photograph on the D-Poster information sheet provided with the planning drawings helps to illustrate the minimal difference between the existing type of display and the proposed replacement once controls are put in place.

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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 any local heritage assets.

The site is sufficiently distanced from the surrounding residential frontages, the closest being north west of the site on Barlow Road (approximately 54m away), the view from the sign to the homes is blocked by mature trees along the road. It's considered that their amenity would not be impacted due to the implementation of the D-Poster. During the daytime, the poster will present as a traditional paper and paste advertisement hoarding. Controls are in place to ensure that the advertisement display is never overly illuminated, but sensors within the display are able to gauge the lighting levels and adjust the brightness of the display accordingly. In accordance with the categorisations set out in the newly published ILP Guide PLG 05/23, the maximum night-time luminance of the display should be set at 300cd/m2.

The proposals seek to reduce the number of advertisements in place by two thirds, resulting in a significant improvement that what is currently at the site. The level of illumination will reflect local ambient conditions, with little material change to the site as it currently exists.

Public Safety

When assessing public safety, the key considerations are whether the location is appropriate (i.e. undemanding on the driver) and whether the level of illumination and the sequential change between advertisements is controlled to prevent distraction from the driving task. As the principle of an advertisement has already been established in this location, the Council must only consider whether the proposed controls are sufficient to ensure that there is no additional distraction that would cause an unacceptable impact on highway safety. Should the Council's Highway department identify any reasons why the location might be challenging to drivers, the applicant would be open to discussing alternative controls. However, it should be noted that the proposed conditions are now well established as best practice and as such any change (e.g. to the rate of change) would need to be evidence-based and be specific to the location.

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 proposed display would occupy the same position as the existing advertisements, ensuring sight lines are maintained and traffic signage is unchanged. The advertisement is predominantly seen by those travelling east along Barlow Road, which is 20mph and is well-lit.

The road is a single carriageway with few elements to distract drivers. As such, drivers would be entirely capable of glancing at advertisements whilst maintaining stopping distances and an awareness of surrounding traffic movements. The proposal site is in an uncomplicated location which drivers should be able to navigate the area with ease.

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Whilst the proposed D-Poster would be capable of displaying up to 6 advertising campaigns on rotation, only one is displayed at any point in time, for at least 10 seconds. It is not considered that the presence of the proposed D-Poster on the site would represent a material departure from the types of features that drivers are used to seeing on local or surrounding roadways. 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;
- 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 will not change the size, position or orientation of the existing right-hand advertisement, which benefits from deemed consent and has been in situ for many years and operated without issue. The proposal results in the removal of the two left-hand displays from the site, delivering a significant benefit to the amenity of the immediate neighbourhood. 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 adjacent to Barlow Road, in an area of mixed character 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:

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- Completed application forms
- Letter Statement (this letter and appendices);
- Architectural drawings including;
 - 15733 PA 01 Site Location Plan
 - 15733 PA 02 Existing Site Plan
 - 15733 PA 03 Proposed Site Plan
 - 15733 PA 04 Existing and Proposed Elevations
 - 15733 PA 05 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

E. Johnson

EMILY JOHNSON
Senior Planner

e-mail: eejohnson@alderking.com
direct dial: 0117 317 1014
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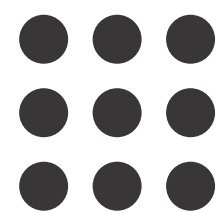
Appendix 1: D-Poster Example Site



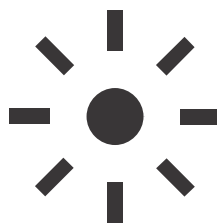
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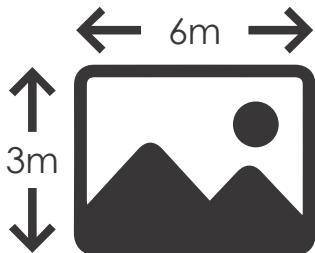
D-POSTER



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)

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Appendix 2: Lighting Conditions



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Daytime Clear Skies



FREE RANGE

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

Discovered by the publisher of 2020
in partnership with Clear Channel
Advertisement

Clear Channel



GET SHARP

Daytime Overcast



Twilight



Pitchford Steelstock
Tel: 01384 489030

Tomorrow
begins **Today.**

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Dusk



Night

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Appendix 3: Model Conditions



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:

- 15733 PA 01 Site Location Plan
- 15733 PA 02 Existing Site Plan
- 15733 PA 03 Proposed Site Plan
- 15733 PA 04 Existing and Proposed Elevations
- 15733 PA 05 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 3 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.