

One Chapel Place
London
W1G 0BG

T: 020 7518 3200
F: 020 7408 9238

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

2nd February 2023

Dear Sir/Madam,

TOWN AND COUNTRY PLANNING (CONTROL OF ADVERTISEMENTS) (ENGLAND) REGULATIONS 2007

99 ALBERT ROAD, LEVENSHULME, MANCHESTER, M19 2FU: CONVERSION OF POSTER ADVERTISEMENT DISPLAY TO D-POSTER

We have been instructed by Wildstone Estates Limited to submit an application for advertisement consent to upgrade an 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.

This 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 displays and developing new sites in better locations. The overall strategy is to reduce the numbers of displays whilst increasing their quality.

The Applicant

Wildstone Estates Limited (the Applicant) 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.

This specialist landlord-tenant dynamic is symbolic of the maturity of the outdoor advertising sector as it becomes a legitimate property class attracting new investment and innovation. As the largest owner of advertising assets in the Country and landlord to all of the major operators, Wildstone are in a strong position to be able to push best practice and to change the perception of digital out of home (DOOH) advertising.

It is imperative, as part of this process, that there is confidence that digital displays can be appropriately controlled, and that there is a responsible party ensuring that conditions agreed at planning stage are met. Wildstone perform this function as they have a long-term investment in the sites regardless of who the tenant is.

Through partnership with the media operators as tenants, our in-house specialists, 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 Networks Operation Centre (NOC) and the sites are monitored remotely 24/7 to facilitate responsive maintenance. Diagnostics software reports any faults back to the NOC and a kill switch turns the content to black until it can be resolved.

Wildstone has also invested in hardware through the development of the “D-Poster” which offers a high level of control over brightness, enabling it to mimic a traditional 48 sheet poster during the day and in the evening to ensure that it is muted and appropriately lit.

The Proposal

The proposal seeks to “repost” the existing externally illuminated display at 99 Albert Road, Levenshulme, Manchester, M19 2FU to a “D-poster” which will display multiple static advertisements on rotation.

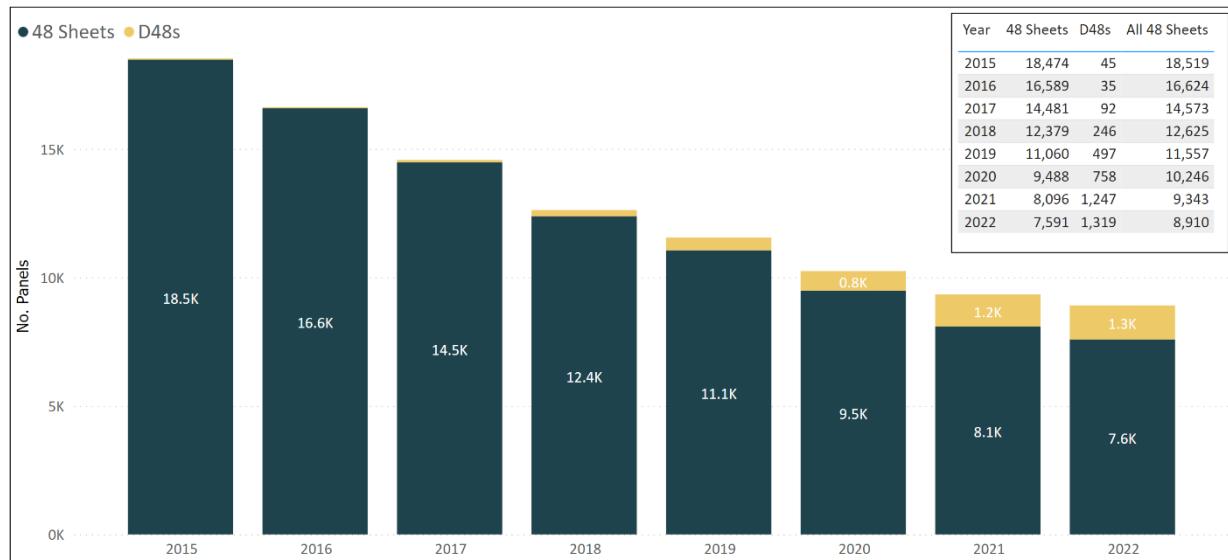
The proposed panel has the same dimensions as the existing 48-sheet hoarding, measuring 6m(w) x 3m(h) x 0.061m (d) and is a like for like replacement. The proposed new display technology is lightweight, durable, efficient and can be easily erected with minimal engineering. In most instances the re-posting of a D-Poster can be achieved at a similar speed to traditional posting, with minimal structural work. The quality of the image produced will mimic that of a traditional poster, as illustrated at **Appendix 1**. An example of a digital display operating in a similar environment is included at **Appendix 2**.

The proposed display will meet modern requirements and will be capable of displaying 6 advertising campaigns at a time, sequencing every ten seconds.

The proposal is submitted as part of a nation-wide project to upgrade traditional advertising hoardings to a modern digital format. It should be noted that this will see an overall reduction in adverts as multiple advertising campaigns can be supported by single panels. This will see the end of sites comprising a number of competing adverts all displaying different campaigns.

The statistics back this up (see Figure 1). At present, there are 1,319 digital 48-sheet advertisements in 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 over 700 consents have been granted for digital advertisements across the UK.

Classic & Digital Roadside 48 sheets: 2015-2022



Source: SPACE / Wobblytics (2022 to Q1)

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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.

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:

- Tidy up poorly 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 association 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 campaigns (i.e. Covid-19 Government messaging); 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.

Conditions

As described earlier, it is imperative that digital displays are appropriately controlled to ensure that they are acceptable in amenity and public safety terms. Outsmart, the advertising industry body (formerly the Outdoor Media Centre) has sought to self-regulate by introducing a code of practice that restricts the operation of digital displays adjacent to the highway to static images only, on a rotation of on advert every ten seconds, with a rapid change between images. The ILP Guidelines* have also been widely adopted as a means of controlling the night-time luminance of advertisements. This industry standard forms the basis for conditions applied to the majority of digital advertisement consents.

Wildstone and Outsmart continue to work closely with the Institute of Lighting Professionals to establish best practice guidance on the use of digital displays at night time and during the day. A new ILP guide is currently being prepared.

In accordance with the current best practice approach, 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.

During the daytime the screen is able to adjust according to changes in the ambient light, ensuring that the brightness decreases in low light conditions. An example of a display operating in overcast conditions is included at **Appendix 2**.

The following conditions are proposed for this site:

1. The intensity of the illumination of the sign permitted by this consent shall be no greater than 300cd/m² in the hours of darkness. During the daylight hours the luminance shall be controlled by sensors and/or timers to reflect ambient light conditions. At all times the display shall operate within that recommended by the Institution of Lighting Professionals in its Professional Lighting Guide 05 (PLG 05) Brightness of Illuminated Advertisements (or its equivalent in a replacement guide).

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

2. The minimum display time for each advertisement shall be no less than 10 seconds;

Reason: In accordance with industry code of practice and in the interests of amenity and public safety in order to retain effective planning control.

3. Changes between advertisements to take place instantly with fade effect and no other sequencing, fading, swiping or merging effects;

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

4. No individual advertisement displayed shall at any time contain moving images, animation, intermittent or full motion video images, audio, directional symbols or any images that resemble road signs or traffic signals.

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

* Institute of Lighting Professionals best practice guidance; The Brightness of Illuminated Advertisements PLG05 2015

5. The advertisement display shall at all times contain a feature that will turn the display off (showing a black/blank screen) in the event of malfunction or error.

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

Evidence based justification would be required for deviating from the standard approach in order to meet the six tests as set out in National Planning Policy Guidance (NPPG).

The Site

The proposal Site is located on 99 Albert Road and currently supports an existing externally illuminated paper and paste billboard. The Site faces west along Albert Road and overlooks a parking lot which adjoins what appears to be a bowling green. The immediate area is residential in character with various commercial and retail uses in between houses and further afield. The site is enclosed immediately to the south with two large commercial buildings with associated car parking facilities. There is established advertisement precedent in the surrounding area. There is a free standing advertising display placed on the green open space (lawn) at the corner of junction at Slade Lane directly facing traffic lights. This is 0.3km away from the Site. There are several commercial and retail use along Albert Road, as such the Site is considered an established location for advertisements and signs, most of which are associated with these commercial buildings. There are several residential uses along Albert Rd, however, we do not consider that these residential uses would be affected by the proposal, due to their location in relation to the orientation of the proposal.

The Site is not within a Conservation Area, nor is it attached or adjacent to a listed building, or within proximity of any local heritage assets. There are numerous commercial settings and buildings in the area that have associated signs and advertisements which vary in size.

The existing externally illuminated display, has been in place since at least 2008. As the size and nature of the advertisements have not altered in over ten years the existing signage benefits from deemed consent under Class 13(1) of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

Furthermore, there have been various applications for advertisement consent granted for similar proposals of illuminated signage within close proximity to the Site and within Levenshulme. A site at 285-287 Slade Lane located 0.4km away from the Site was granted consent for a retrospective application for the display of illuminated fascia sign and screen surround to ATM machine in 2015 (109901/AO/2015/N2). This was deemed acceptable in relation to the immediate context of the surrounding area which is predominantly residential with retail uses along the road. The illuminated fascia sign directly faces traffic and a block of residential flats.

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 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 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 the area consists of The Core Strategy (Adopted 2011) and the Extant Unitary development Policies (UDP). Policies DC15.1 and DC15.2 (Advertisements, Hoardings and Posters) of the Unitary Development Plan for the City of Manchester states the following:

DC15.1 The Advertisement Regulations require that applications for advertisements be considered only in the interests of amenity and public safety. In determining applications for free standing hoardings and wall mounted posters the Council will take account of the following matters in assessing these interests:

- a. the general location of the proposed development and the effect on visual amenity;*
- b. the scope for posters and hoardings to make a positive contribution to the locality;*
- c. the design of the structures, and the relationship with any premises on which they are located;*
- d. the effect of the proposal on permanent redevelopment of the land;*
- e. public safety resulting from the positioning of the design of the display;*
- f. the ease with which the structure is capable of being satisfactorily maintained;*
- g. the use of hoardings to screen vacant sites or buildings during development, or where development is known to be imminent;*
- h. the use of hoardings as part of a scheme to prevent access by unauthorised users onto land pending development;*
- i. the use of hoardings to disguise or improve the appearance of unsightly features, operations or activities;*
- j. the number of advertisements in the locality and their cumulative effect on visual amenity.*

DC15.2 In assessing the interests of amenity and safety the Council will take account of the following criteria:

- a. developments of this kind should not harm the character or architectural features of a building, nor interfere with its proper use;*
- b. they should be in scale with the locality and relate properly to the site on which they stand;*
- c. they should be unobtrusive and should not intrude into residential neighbourhoods and areas of high amenity value;*
- d. a proposal which would be injurious to public safety or adversely affect the flow of traffic, by reason of its position, size, or design will not be permitted.*

The council further state that they accept that advertisements can have a positive role in improving the quality of the visual environment in the City - examples are given in policy DC15.2. At the same time, there is the need to maintain public safety, avoid clutter, and safeguard the particular features of buildings or land.

Planning Considerations

The proposal will not cumulatively increase the number of adverts in the area. The like for like replacement of the display and the control over operation seeks to ensure that the change in the visual impact of the site on the surroundings is de-minimis and not material. Nevertheless, it is acknowledged by the applicant that the change in the type of illumination and the potential to increase the rate of change of the adverts would require express advertisement consent. The impact of these alterations have been considered in amenity and public safety terms as follows:

Amenity

As the proposal seeks to “repost” the existing advert and therefore mimic the existing situation, there will be minimal impact on visual amenity during the daytime. The size of the advertisement will remain the same, including the height of the advert from the ground. The level of illumination will reflect local and ambient conditions, with little material change to the site as it currently exists. 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 controls proposed over the level of luminance at night are in line with the ILP Guidelines and industry best practice and will ensure that the proposed display does not cause any material harm to amenity. The commercial context of the surroundings, including street lighting establishes the site as appropriate for an illuminated advert of this type. Additional controls over the display will be considered, if necessary, to remedy a specific amenity concern.

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.

In this instance the size and positioning of the advertisement will remain the same.

The proposal would not be detrimental in either an immediate or wider sense. It is not within a Conservation Area, attached or adjacent to a listed building, or within proximity of any local heritage assets.

Given the nature of the site and surrounding area and the similarities between the existing and proposed unit, there would be little, if any, material change in the appearance of the street scene. As a direct swap the display would not amount to clutter or contribute to any cumulative impacts, sitting comfortably in its visual context without harming amenity, the qualities of the site, or the character and appearance of the wider area.

When viewing the Site, the proposal would be seen within the same context of a commercial site with associated car park, to which the proposal would appear subservient and preserve a familiar relationship. The proposal Site is also one which is established for advertising, with the current advertisement having existed in its location since at least 2008. In this regard, the Site can be considered as wholly appropriate in principle for advertising of this type. Indeed, it is commonplace to see adverts of this nature in this type of location as shown in the images at **Appendix 2**.

Statistics demonstrate how commonplace and well established D48 displays have become across the country.

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

is already 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. 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 be unusual and would need to be evidence based and specific to the location.

The proposed display would occupy the same setback and offset position as the existing unit, ensuring site lines and visibility splays are maintained. It would only be seen by traffic travelling east along 99 Albert Road, which is recommended for is well lit, straight, level, and has excellent forward visibility. Highway users would therefore be fully capable of glancing content far in advance of the site without being distracted from the road or traffic conditions ahead. 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. As such, drivers would be entirely capable of glancing at advertisements whilst maintaining stopping distances and an awareness of surrounding traffic movements.

Under such circumstances, a familiar feature of 99 Albert Road and 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.

Conclusion

The proposal will not change the size or orientation of the advert. As such the established acceptability of the advertisement should not change materially. The proposed conditions to control the luminance of the screens and the operation of the digital screens will ensure that there is no additional harm to amenity or road safety.

The proposal will be located on a commercial site 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

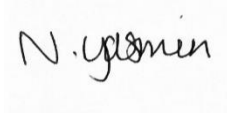
In order to complete the application, please find attached the following documentation:

- Completed application forms
- Letter Statement (this letter);
- Architectural drawings including;
 - 011-0203-5042_PA_01 Site Location Plan
 - 011-0203-5042_PA_02 Existing Site Plan
 - 011-0203-5042_PA_03 Proposed Site Plan
 - 011-0203-5042_PA_04 Existing and Proposed Elevation

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

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 read 'N. Yasmin', on a light-colored rectangular background.

Nilufa Yasmin

Planner

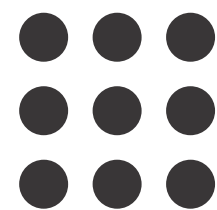
E: nilufa.yasmin@carterjonas.co.uk

T: 020 7518 3246 x2783

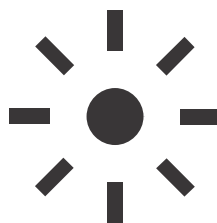
M: 07795 316 403

APPENDIX 1 - D-POSTER EXAMPLE

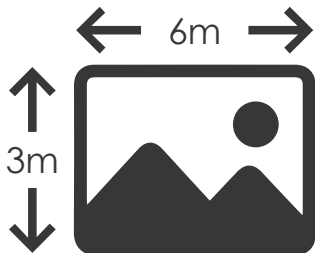
D-POSTER



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 - RECENTLY IMPLEMENTED DIGITAL 48 SHEET POSTER IN DUDLEY
OPERATING DURING OVERCAST WEATHER**

Appendix 2



Recently Implemented Digital 48 Sheet Poster in Dudley operating during overcast weather.