

Manchester City Council
Planning
P O Box 532
Manchester
M60 2LA

One Chapel Place
London
W1G 0BG

T: 020 7518 3200

F: 020 7408 9238

18th July 2022

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

REPLACEMENT OF POSTER ADVERTISEMENT DISPLAY TO D-POSTER AT 80 STOCKPORT ROAD, MANCHESTER, M12 6AL

Dear Sir/Madam,

We have been instructed by Wildstone Estates Limited to submit an application for advertisement consent to replace a previously 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 previously established display at 80 Stockport Road, Manchester, M12 6AL with a “D-poster” which will display multiple static advertisements on rotation. The display has been removed but had been established for adverts for at least 9 years from September 2008 and June 2017. The proposed display will be considerably slimmer than the previously installed display, and the height and width would remain the same.

The proposed panel has the same dimensions as a standard 48-sheet hoarding, measuring 6m(w) x 3m(h) x 0.061m(d) and positioned 5m above ground. 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.

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.

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.

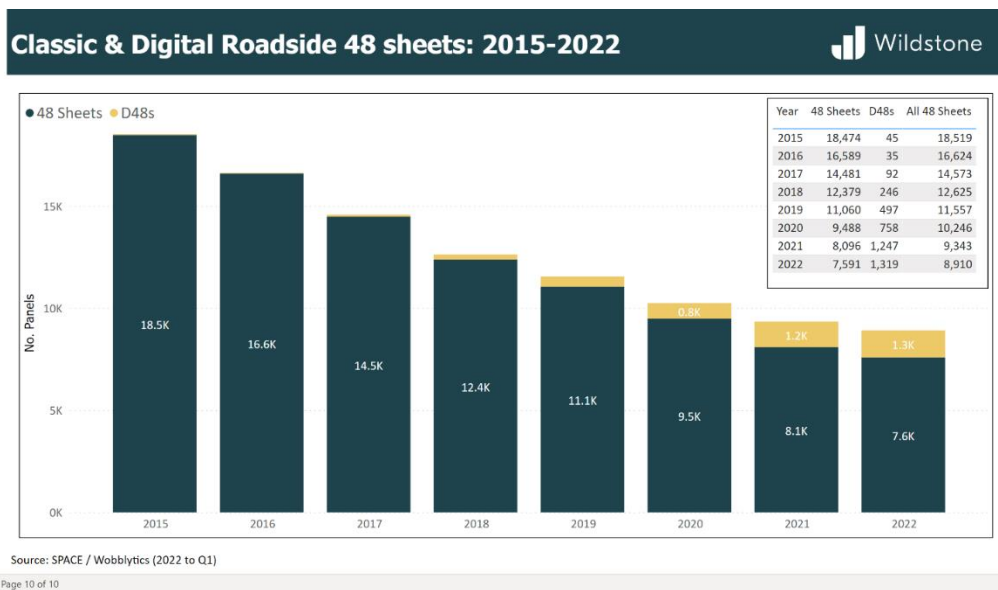


Figure 1 – Reduction in 48 sheet advertising 2015-2022

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 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 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 can adjust according to changes in the ambient light, ensuring that the brightness decreases in low light conditions.

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.

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).

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

The Site

The proposal site is located on the southern side elevation wall of 2 Polygon Ave, which is currently occupied by a beauty salon, and has until recently supported one 48-sheet billboard; the established display has been removed since 2018. The site overlooks a green space as well as the busy Stockport Road. . The site surroundings are predominantly commercial and residential. Commercial uses are located at ground floor level along the length of Stockport Road to the northwest of the site and a large wholesaler unit is situated opposite the site on the eastern side of Stockport Road.

The site is not within a conservation area or near any listed buildings,.

The closest residential properties are on Polygon Ave, to the west of the site but the proposed display will not overlook these properties. Residential properties at Lauderdale Crescent are opposite to the site to the southeast. However, these are located a significant distance of 77m away from the proposed display. Furthermore, the existing trees situated between the application site and Lauderdale Crescent will also occlude any view of the proposed billboard

The proposed display would be on a flank wall in a predominately commercial location where it is traditional to see 48 sheet hoardings across the UK, as indicated in the images in the appendices.

The proposal site is an established location for advertising, having supported an advertising display from at least 2008 until the display was removed between 2017 and 2018. Although the established display is not currently in place, the site is a previously established advertising site.

Similar advertisement applications are located near to the site. Just 75m to the north of the site, an application for the conversion of an existing 48 sheet vinyl advertisement display to a digital display was approved in September 2019 (ref: 124350/AOH/2019). Further north along Stockport Road close to the roundabout there are 7 advertisement displays. Approximately 2.2 miles south along Stockport Road, an appeal was allowed in June 2022 for the upgrade of an existing 48 sheet advertisement to a digital display (ref: APP/B4215/Z/22/3296481). Similarly to the application proposals, the appeal site was located in a predominantly commercial location with some nearby residential uses. The appeal site was also located close to the busy Stockport Road and the Inspector concluded that the proposed advert would not have any harmful impact upon amenity. We consider the nearby advertisements and relevant decisions to be a material consideration in the determination of the application proposals.

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 Manchester Core Strategy (2012) and the Extant Unitary Development Plan.

Planning Considerations

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 below.

Amenity

As the proposal seeks to “repost” the previously installed advert and therefore mimic the existing situation, 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 context of the surroundings, including street lighting and the busy main road establishes the site as appropriate for an illuminated advert of this type. As discussed above, there are other advertisements in the locality indicating that this is an appropriate location for the application proposals.

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 proposal is considered to be of an appropriate scale relative to the site. Its depth is less than that of the previously established display, whilst its height and width are the same.

The proposal would not be detrimental in either an immediate or wider sense, particularly taking into account the hoarding which already stands on site and the display that was in place from at least September 2008 and June 2017

It is situated immediately adjacent to commercial uses which 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.

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 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. 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 proposal site is in an uncomplicated location which drivers should be able to navigate with ease. Polygon Avenue and Stockport Road are straight roads. 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.

Furthermore, according to crashmap.co.uk, only one slight crash incident happened within 100 metres of the site in the past 5 years, indicating a safe stretch of road. On this basis, as well as there being no evidence to suggest that a static digital advertisement display is any more distracting than a paper and paste advert, the proposal should be considered acceptable.

Application Submission

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

- Completed application forms
- Letter Statement (this letter);
- Appendix 1- D Poster
- Architectural drawings including;
 - PA_01 Site Location Plan
 - PA_02 Existing Site Plan
 - PA_03 Proposed Site Plan
 - PA_04 Existing and Proposed Elevation

Additionally, we will arrange payment to Manchester City 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,

Jenna Murray