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BY PLANNING PORTAL REF: PP-11600859

Manchester City Council
Planning
PO Box 532
Manchester
M60 2LA

31871/A5/FP/LS
20th October 2022

Dear Sir/Madam,

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

619-627 ROCHDALE ROAD, MANCHESTER, M40 7XH CONVERSION OF POSTER ADVERTISEMENT DISPLAY TO D-POSTER

We have been instructed by Wildstone Estates Limited ("the Applicant") to submit an application for advertisement consent to upgrade 2no. 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 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 number of displays to deliver premium sites in the best locations, capable of supporting multiple advertising campaigns and providing a piece of digital infrastructure.

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 a 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. 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 landlords, 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 Networks 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 “repost” the existing displays at 619-627 with two “D-posters” which will display multiple static advertisements on rotation. The proposal would replace the two existing sheet advertisement display and will be situated roughly in the same place of the existing billboards, albeit the 48-sheet D-poster (labelled D on Plan 1833|PA|03) will be positioned more centrally, adjoining the 96-sheet D-poster (labelled C on Plan 1833|PA|03).

One of the proposal panels (labelled D on Plan 18333|PA|04) has the same dimensions as a standard 48-sheet hoarding, measuring 6m(w) x 3m(h) x 0.061m(d) and will be positioned 1.85m above ground. The other proposed panel (labelled C on Plan 18333|PA|04) is wider, having the same dimensions as a 96-sheet hoarding, measuring 12m(w) x 3m(h) x 0.061m(d) and will be positioned 1.85m 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**. Examples of a digital display operating in a similar environment is included at **Appendix 2**.

A landscaping scheme, prepared by LandArb Solutions has also been submitted in support of the proposals, and shows how the scheme will deliver tree planting and grassland/wildflowers within the site boundary. All plants will conform to BS 3936-1 (1992) and be in accordance with the National Plant Specification. Supplying nurseries will be registered under the HTA Nursery Certification Scheme. All trees shall be planted in accordance with BS: 8545:2014.

The proposed displays will meet modern requirements and will each 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, which 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 display different campaigns.

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 1,300 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.

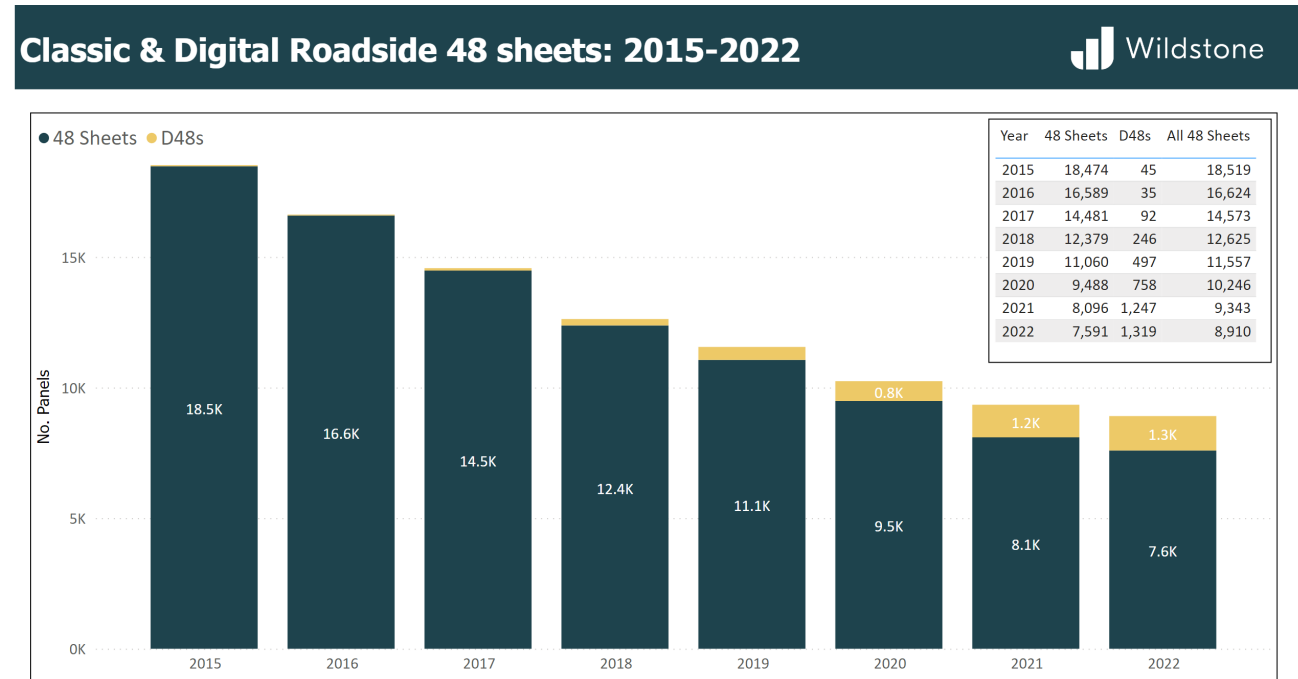


Figure 1: Reduction in 48-sheet advertising 2015-2022

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 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 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 3**.

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.

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

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 bounded by Rochdale Road to the east, Queens Road to the north, Inkerman Street to the west and a takeaway restaurant to the south. The Site currently supports two freestanding hoardings.

The Site's immediate surrounding is predominantly residential and commercial in character. Residential properties front Queens Road to the north of the Site and occupy the land further to the south beyond the neighbouring takeaway. Manchester Communication Academy is located to the northeast of the Site, on the adjacent side of Rochdale Road.

Areas of amenity greenspace are located to the south, east and west of the Site and are occupied by a number of similar advertising displays. To the east of Rochdale Road, approximately 40m opposite the Site, there are two digital advertisement hoardings. These have recently been granted advertisement consent in August 2019 by the Council to be upgraded to digital displays (123973/AOH/2019). Approximately 41m to the south of the Site there is another digital advertisement hoarding. The proposal Site's context is, therefore, an established location for advertising.

In terms of policy designations, the Site is located within North Manchester. Policy EC4 of the Manchester Core Strategy 2012 to 2017 (adopted 2012) sets out the Council's vision for economic development in North Manchester, including the delivery of 13ha of employment land. Specifically, the Site is allocated for commercial/business uses under Policy HC11 of the saved policies of the Manchester Unitary Development Plan (UDP) (adopted 2012).

The Site is not subject to any statutory landscape, environmental or historic designations and is not located within a Conservation Area. The nearest heritage assets include two Grade II Listed Buildings. Brierley Statue (Ref. 12070789) is located approximately 260m north of the Site and 691-695 Rochdale Road (Ref. 1247605) is located approximately 350m north of the Site. Furthermore, Queens Park is designated as a Grade II Park and Garden (Ref. 1001523), located approximately 150m north of the Site.

There have been no planning applications directly on the Site within the past 5 years. However, the proposal Site is an established location for advertising, having supported the billboard advertisement for over 11 years, as demonstrated at **Appendix 4**. As the advertisement displayed on the Site has been in continual use for over 10 years, and there has not been a material increase in the extent to which the Site has been used, or a material alteration in the manner in which it has been used, the signage benefits from deemed consent under Class 13(1) or the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

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.

Manchester’s development plan currently comprises of the Core Strategy (adopted July 2012), Extant Unitary Development Plan Policies (UDP), Greater Manchester Joint Waste DPD and Greater Manchester Joint Minerals DPD. Policy DC15 of the Extant UDP relates to advertisements and states that applications for advertisements will be considered only in the interests of amenity and public safety. In particular, the Council will take into 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*

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*

Policy EN1 of the Core Strategy also relates to design principles of new developments, stating that new development in Manchester will be expected to take into consideration its location within the specific areas and reinforce the sense of place and local distinctiveness of the City. Policy SP1 of the Core Strategy sets out the key spatial principles which will guide the strategic development of Manchester. The emphasis is on the creation of neighbourhoods of choice, providing high quality and diverse housing around district centres which meet local needs.

PLANNING CONSIDERATIONS

The like for like replacement of the displays and the control over operation seeks to ensure that the change in the visual impact of the Site on the surroundings is de-minimum 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 the visual amenity during daytime. At night, the night-time illumination setting 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 and presence of streetlights, bus stops and other internally illuminated digital advertisement billboards along Rochdale Road and Queens Road establishes the Site as appropriate for an illuminated advert of this type. The provision of additional landscaping at the Site will also soften the outlook of the advertising displays and improve the visual amenity of the Site.

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 of both billboards will remain the same, albeit the positioning of the 48-sheet billboard will be altered slightly. This 48-sheet billboard will be repositioned more centrally in the Site, further away from Queens Road.

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. The site can be considered wholly appropriate in principle for advertising of this type. Indeed, the existing advertisement hoardings have been located on the Site for a minimum of 11 years.

Statistics also demonstrate how commonplace and well established digital advertising 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 Site is in an uncomplicated location which drivers should be able to navigate with ease. The billboards are located on a crossroad and so each billboard will be viewable from different approaches. Billboard C would be viewable predominantly from traffic travelling southbound on Rochdale Road and Billboard D would be viewable predominantly from traffic travelling eastbound on Queens Road. Since the billboards are located on a crossroad with traffic controls and speed cameras it is not expected that cars will be travelling at high speed. As such the cognitive demand on road users at this point is low. Drivers would therefore be entirely capable of glancing at advertisement whilst maintain stopping distances and an awareness of surrounding traffic movements.

APPLICATION SUBMISSION

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

- Completed application forms
- Letter Statement (this letter);
- Architectural drawings including;
 - [18333 | PA | 01 *Site Location Plan*]
 - [18333 | PA | 02 *Existing Site Plan*]
 - [18333 | PA | 03 *Proposed Site Plan*]
 - [18333 | PA | 04 *Existing and Proposed Elevation*]
- Landscape Proposals
 - [LAS 504 01 *Landscape Proposals*]

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,



LIZ SLATER
Planner

APPENDIX 1

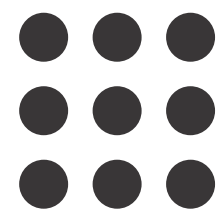
D-POSTER INFORMATION SHEET

TOWN PLANNING
MASTERPLANNING & URBAN DESIGN
ARCHITECTURE
LANDSCAPE PLANNING & DESIGN
SUSTAINABLE VALUE

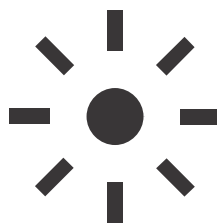
INFRASTRUCTURE & ENVIRONMENTAL PLANNING
HERITAGE
GRAPHIC COMMUNICATION
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managed forests.

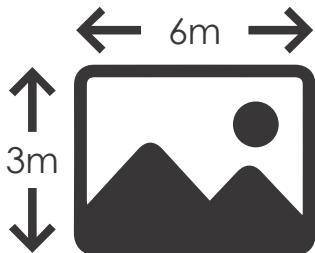
D-POSTER



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 OF COMPARABLE DISPLAY

TOWN PLANNING
MASTERPLANNING & URBAN DESIGN
ARCHITECTURE
LANDSCAPE PLANNING & DESIGN
SUSTAINABLE VALUE

INFRASTRUCTURE & ENVIRONMENTAL PLANNING
HERITAGE
GRAPHIC COMMUNICATION
COMMUNICATIONS & ENGAGEMENT
DEVELOPMENT ECONOMICS

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managed forests.

Oldham Road, Manchester



Media operator

Alight

URN

19183

Location

Opposite Shell Garage,
Oldham Road, Manchester.

LPA:

Manchester

Appeal Ref:

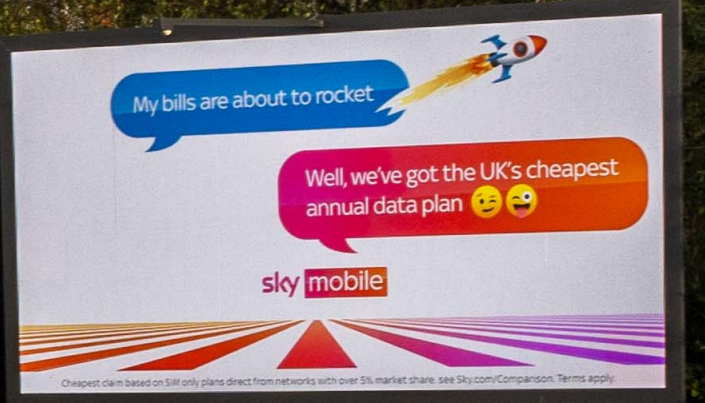
APP/B4215/Z/20/3262571

Type

Freestanding

Completion

21 Feb 2022



APPENDIX 3
EXAMPLE OF DISPLAY OPERATING IN OVERCAST CONDITIONS

TOWN PLANNING
MASTERPLANNING & URBAN DESIGN
ARCHITECTURE
LANDSCAPE PLANNING & DESIGN
SUSTAINABLE VALUE

INFRASTRUCTURE & ENVIRONMENTAL PLANNING
HERITAGE
GRAPHIC COMMUNICATION
COMMUNICATIONS & ENGAGEMENT
DEVELOPMENT ECONOMICS

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FREE RANGE

Lily Bole
Lily Bole's 'At Home 2020' collection is available at Home 2020
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© 2020

Showing the products of 2020
in partnership with Clear Channel
Nationalism

Clear Channel


Dudley Street
Guns Village

West Bromwich Parkway
Footpath and cycleway

GET SHARP

May 2011



May 2011



June 2015



November 2015



TOWN PLANNING
MASTERPLANNING & URBAN DESIGN
ARCHITECTURE
LANDSCAPE PLANNING & DESIGN
SUSTAINABLE VALUE

INFRASTRUCTURE & ENVIRONMENTAL PLANNING
HERITAGE
GRAPHIC COMMUNICATION
COMMUNICATIONS & ENGAGEMENT
DEVELOPMENT ECONOMICS

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August 2021



August 2021



TOWN PLANNING
MASTERPLANNING & URBAN DESIGN
ARCHITECTURE
LANDSCAPE PLANNING & DESIGN
SUSTAINABLE VALUE

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