

Our Ref: JW/GM/93456

24 October 2022



Manchester City Council
PO Box 532
Town Hall
Manchester
M60 2LA

BY EMAIL ONLY

Dear Sir/Madam

**TOWN AND COUNTRY PLANNING (CONTROL OF ADVERTISEMENTS) (ENGLAND)
REGULATIONS 2007
CONVERSION OF POSTER ADVERTISEMENT DISPLAY TO D-POSTER
408 STRETFORD ROAD, HULME, MANCHESTER, M15 4AE**

We have been instructed by Urban and Provincial Advertising Limited to submit an application for advertisement consent to upgrade a long established paper and paste advertising display to a modern digital format ('D-Poster'), 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 maximum 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

Urban and Provincial Advertising 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.

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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 advertisement display at 408 Stretford Road, Hulme with a D-Poster which will display multiple static advertisements on rotation. This represents a like-for-like replacement of the existing advertisement signage on the site with regard to size, orientation and position.

The proposed panel has the same dimensions as a standard 48-sheet hoarding, measuring 6m(w) x 3m(h) x 0.1m (d) and positioned 1.65m above ground. The proposed new display technology is lightweight, durable, efficient and can be easily erected with minimal engineering. In most instances the erection 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 and paste display, as illustrated in the enclosed D-Poster Information Sheet and the example site photos for the site at 142 Liverpool Road, Warrington before and after its conversion to a D-Poster. The proposed display will meet modern requirements and will be capable of displaying 6 advertising campaigns at a time, sequencing every ten seconds.

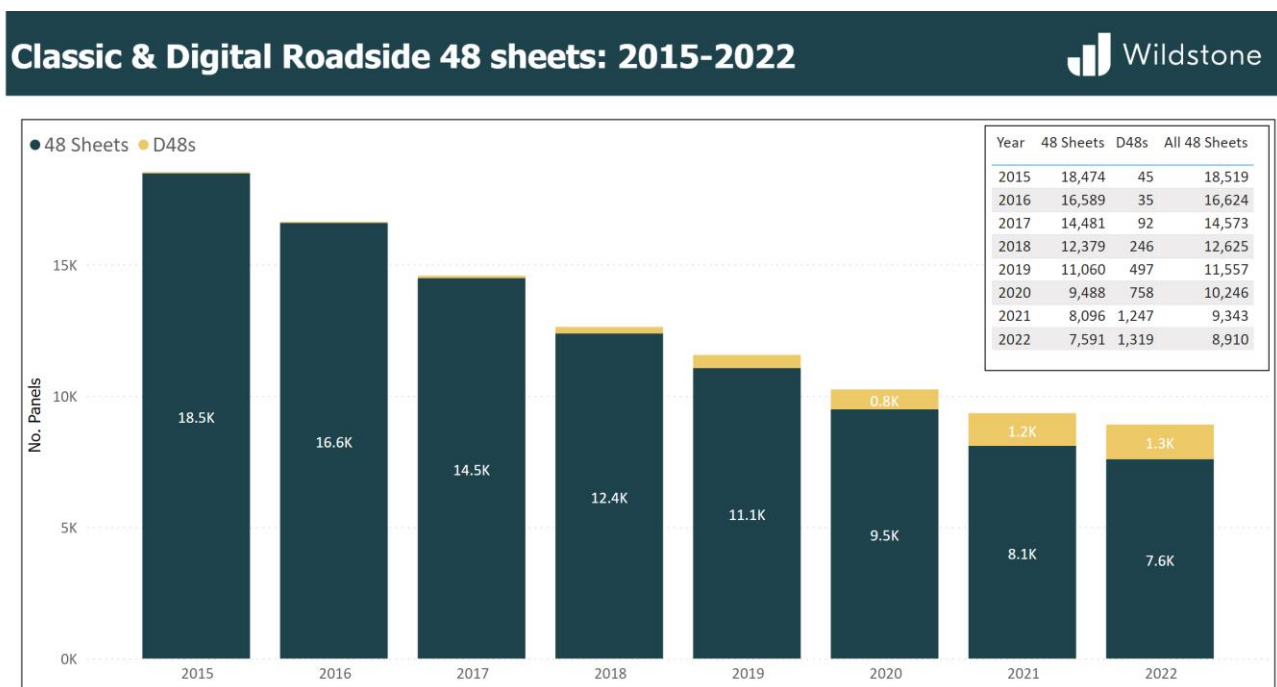
The proposal is submitted as part of a nation-wide project to upgrade traditional advertising hoardings to a modern digital format, which will see an overall reduction in adverts, as multiple advertising campaigns can be supported by single panels. This will result in the consolidation of "multi-panel" 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 over 700 consents have been granted for 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.

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 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);
- Opportunity to integrate additional hardware to meet Smart City objectives;

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

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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. Examples of D-Posters operating in various conditions are enclosed showing the displays on a bright day, overcast day and at dusk.

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.

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

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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 the National Planning Policy Guidance (NPPG).

The Site

The proposal site is located on the corner of Stretford Road and Erskine Street, on the gable wall of the property 408 Stretford Road, Hulme, Manchester, M15 4AE. The site currently supports one 48-sheet poster and paste advertisement billboard. The site surroundings comprise a mixed character of commercial/retail/residential uses.

The street scene along Stretford Road is characterised by a plethora of signage commensurate with commercial/industrial/retail uses in the immediate vicinity.

The proposal site is an established location for advertising, having demonstrably supported one 48-sheet poster and paste billboard for over 14 years. Photographic evidence, using Google Streetview, confirms that the existing billboard has remained in place for over 10 years which therefore benefits from deemed consent under Class 13 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

This sets out the position of the site and immediate vicinity in that it is an established area for signage. It is noted that the proposals seek to only upgrade and digitise an existing lawful billboard and would not further intensify the area in this regard.

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 Manchester City Council Local Plan 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.

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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-minimus and not material. Nevertheless, it is acknowledged by the applicant that the introduction of internal 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 proposed works will see replacement of the dated billboard on the site with a modern digital screen. The level of illumination of the proposed D-Poster will be set to ensure that the proposed advertisement is not visually materially different from the existing position.

During the day, the proposed level of illuminance will be set to mirror that of a traditional poster and paste board, in line with the current position of the site. At night time, the controls proposed over the level of luminance along with the orientation of the D-Poster will ensure that the introduction of internally illuminated signage on the site does not cause material harm to amenity. Luminance of the D-Poster will be limited to 300cd/sqm during night time hours to ensure this is appropriate to the local area and give rise to no negative impact to amenity in this regard. The existing/proposed signage on the site faces west with the closest facing building situated circa 20m away. The proposed operational restrictions for the D-Poster, combined with its positioning and orientation, are such that the associated light spill will give rise to no unacceptable impacts with regard to amenity. Where circumstances demand, additional controls or variations of these conditions (such as night time curfew or reduced D-Poster luminance below the ILP best practice guidance) may be acceptable to the applicant.

The context of the surroundings, including illuminated shop signage (such as the ‘best-one’ shop opposite the site) and street lighting establishes the site as appropriate for an illuminated advert of this type. When considering the merits of the proposed digital advertisement board, it is important to note that should consent not be forthcoming, the fall-back position amounts to what already exists on the site. The principle of the proposed use is therefore already established and the current poster board would remain in situ should the proposed digitalisation not be approved.

Consideration should therefore only be given to the replacement of the existing advertisement board and any impacts this would bring i.e. the introduction of internal illumination. Visually, it is considered that this will have no impact on the street scene and any residential dwellings, thereby there will be no detrimental impact on amenity when compared to the current lawful position.

The side by side comparison photograph on the enclosed D-Poster information sheet and example site at 142 Liverpool Road, Warrington 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. Statistics, provided at **Figure 1**, demonstrate how commonplace and well established D48 displays have become across the country.

Given the nature of the site and surrounding area and the presence of other signage in the immediate context, there would be little, if any, material change in the appearance of the street scene. The existing advertisement billboard at the site has been in place for over 14 years and constitutes a well-

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established feature of the street scene. The proposed replacement D-Poster would have no impact on the street scene when considered in this context, would cause no cumulative increase in advertisement signage and sit comfortably in the visual context while not harming amenity, the qualities of the site, or the character or appearance of the wider area.

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.

It is therefore considered that the proposed works will have no unacceptable impact with regard to amenity.

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 D-Poster would be seen primarily by traffic travelling east along Stretford Road which is well lit, straight, level and has excellent forward visibility. The cognitive demand on road users at this point is low as there are no unusual highway complexities which would require extra care to be taken. As such, drivers would be entirely capable of glancing at advertisements whilst maintaining stopping distances and an awareness of surrounding traffic movements.

The proposal to introduce internally illuminated signage to the site is considered to have no material impact on the level of distraction caused to any road user such that it would have any potential unacceptable impact on highway safety. It should be noted that drivers are almost always continually assimilating sensory inputs from multiple sources whilst driving. 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 at the roadside. The proposal would therefore appear as an incongruous feature.

The introduction of a sequential change in the adverts will not have a material impact on the level of distraction as the changeover will be instantaneous and not more frequent than once every 10 seconds. This will reduce eye dwell time on the D-Poster and therefore the potential for a distraction is low. In this regard, free flowing traffic will see most road users pass the sign without seeing a sequential advert change and in times of stop-start traffic, road users will be travelling very slowly. The introduction of a sequential advert change on the signage at the site is therefore considered to pose no increase in risk to highway safety.

Under these circumstances, such a familiar feature of Stretford Road and the surrounding highway network would not constitute a hazardous distraction to anyone exercising a reasonable standard of

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care. Consequently, the proposal would not give rise to public safety issues, which would prevent the granting of an express advertisement consent.

Conclusion

The existing advertisement board on the site has demonstrably been in place for over 14 years and is a well-established feature of this part of the street scene along Stretford Road. The existing lawful advertisement signage on the site shall be retained in the event that consent is not granted for the proposed D-Poster. The proposal constitutes a like-for-like replacement of advertisement signage on the site in all regards save for the introduction of internal illumination and sequential advert change.

The proposal will not change the size, position or orientation of the advert. As such the established acceptability of the advertisement should not change materially. The proposed conditions to control the luminance and operation of the D-Poster will ensure that there is no additional harm to amenity or public safety.

For these reasons, when assessing the impacts of the proposed works with regard to amenity and public safety, it is considered the proposals are consistent with the extant lawful position and would not give rise to any unacceptable impact in both regards. This application for advertisement consent should therefore be granted without delay.

Application Submission

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

- Completed application forms prepared by Alder King Planning Consultants;
- Letter Statement prepared by Alder King Planning Consultants (this letter);
- Before and after D-Poster conversion example site at 142 Liverpool Road, Warrington;
- D-Poster Information Sheet;
- Example D-Poster sites document showing operation on a bright day, overcast day and at dusk; and
- Architectural drawings including:
 - 011-0203-6622/PA/01 Site Location Plan;
 - 011-0203-6622/PA/02 Existing Site Plan;
 - 011-0203-6622/PA/03 Proposed Site Plan; and
 - 011-0203-6622/PA/04 Existing and Proposed Elevations.

Additionally, we will arrange payment to Manchester City Council to cover the cost of this advertisement consent application.

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We 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 submitted information, please do not hesitate to contact us.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Jamie Wilton'.

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